



**Climate Finance in Bangladesh:  
Governance Challenges and Way Out**

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## Preface

Transparency International Bangladesh (TIB) is working to create a favourable environment countrywide that can strengthen the demand for anticorruption and establish good governance. As part of this, it is studying several critical issues and organizations, and on the basis of that, engaging in advocacy programmes.

According to the Global Climate Risk Index 2013, Bangladesh is foremost among countries that would experience the greatest risks due to climate change over the next 20 years. For this reason, TIB has conducted this study as part of ongoing research activities under the Climate Finance Governance Project (CFGF), in an effort to ensure good governance in the management of the climate funds received to address the risks due to climate change, through identifying the challenges that exist and propose means of overcoming them. This research makes recommendations towards identifying the risks and overcoming the challenges to ensuring transparency, accountability and good governance in the establishment, selection and implementation of climate related projects.

The main objective of TIB is to be the catalyst in establishing and strengthening a framework that can ensure transparency, participation, accountability and good governance in the mitigation of climate change related risks, such that the funds collected nationally and internationally may be effectively utilized. As a result of this, while on the one hand confidence of the general public towards allocation of funds in this sector will increase, on the other hand the avenues for receiving compensation that is due from developed countries – the major contributors of climate change – would become more accessible. TIB also has an additional goal to analyze whether the monies pledged by the industrialized nations are indeed being disbursed as “new” and “additional” funds separate from the development assistance and loan assistance, and whether transparency and accountability are maintained in the management of the funds in question.

This research programme has taken place under the leadership of the TIB’s Climate Finance Governance Project Coordinator M. Zakir Hossain Khan. Mohua Rouf and Mohd Mahfuzul Haque were involved in data collection, analysis and report writing at the field level. Additionally, the TIB Deputy Executive Director, Director of the Research Division, high-level researchers and other colleagues supported this initiative with their valuable advice. We owe them our sincere thanks.

Like all the other studies by TIB, there has been an earnest attempt to involve all concerned organizations right from the outset. This investigative research whose objective is ensuring good governance in the projects implemented by climate funding, has been conducted by collecting information using qualitative and quantitative methods, from both direct and indirect sources. As direct sources of information, review of the project proposals approved for various government and non-governmental organizations, hydrographic surveys, site visit of project locations, interviews and opinions of key informants and stakeholder populations were collected. In addition to this, information from research reports, internet websites and newspaper reviews were collected as indirect sources. The information gathered has been finalized after necessary discussions with concerned organizations. Thanks are in order for all of these parties on behalf of TIB.

We hope that the information presented in this report will be able to provide an understanding of the effective utilization of climate finance and challenges related to the approval and implementation of projects under it, and provide guidance in overcoming those challenges.

Any suggestions or advice to amend, correct and enhance this report will be warmly welcomed.

**Dr. Iftekharuzzaman**  
**Executive Director, TIB**

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## 1. Context

Climate change is the main threat to all forms of national and international development, progress, poverty alleviation schemes, security and survival at the national and international contexts. As Bangladesh ranks foremost among the countries most affected by global climate change, there exist grave concerns that in future, its expected course of development may be hindered. According to the Global Climate Risk Index 2013, Bangladesh tops the list of countries most at risk as a result of climate change over the next 20 years (Germanwatch, 2013). In addition to this, the Climate Vulnerable Monitoring Report 2011 mentions Bangladesh as an existing “hot spot” for climate change risk, and also forecasts that by 2030, cyclones resulting from climate change will affect on average, around 0.6 million people annually.

Developing countries like Bangladesh have to spend significant amount of monies every year, to mitigate risks related to climate change. For each country subjected to these risks, the required size of the climate change mitigation fund for adaptation techniques also varies. In this regard, under the Bangladesh Climate Change Trust Fund (BCCTF) Law 2010 that seeks to mitigate disasters caused by climate change, the BCCTF was established, and provision was made for government institutions, experienced NGOs, research organizations and institutions to be financed for relevant projects and activities. To support the cause of climate change mitigation, the Government of Bangladesh has allocated USD 340 million from its annual revenue budget towards BCCTF for the period of FY2010-2014 and industrialized countries (Annex 1) have pledged to provide financial compensation of USD 170 million to the Bangladesh Climate Change Resilient Fund (BCCRF) until June 2013.

In the meantime there have been allegations that among the NGOs that received climate change funding, political influence has been exercised in their selection, and allegations have arisen that many of the NGOs and private organizations who are fund recipients lack relevant experience, or some do not follow the government’s NGO guidelines, etc. This has created the possibility that the funds may not reach the communities whose lives are truly endangered. Thus it has become imperative to ensure integrity, transparency and accountability in the projects funded by the BCCTF, BCCRF and other climate change funds.

### 1.1. Rationale for monitoring projects funded by the climate fund

According to the “Global Corruption Report: Climate Change“, specific models for climate fund management, and addressing governance risks in the case of a new and untried funding sector like climate change, are also absent. The Climate Public Expenditure and Institutional Review 2012 (CPEIR) prepared by the Ministry of Planning, Government of Bangladesh also emphasized transparency and accountability in the projects implemented using climate budgets. Most importantly, TIB has presented a working paper titled “Challenge of Good Governance in Climate Financing and Way Forward” at a consultation meeting of concerned communities at the national and regional level on 9 April 2012, that seeks to identify the challenges and risks in the transparency, accountability, integrity, autonomy and efficiency in the management of funds governed by the legal framework and regulations of the Bangladesh Climate Change Trust Fund and Bangladesh Climate Change Resilience Fund. In this report

political influence related to project selection, lack of information on fund use (e.g. contracts, agreements, etc) irregularity and lack of accountability in the application of the law and within the implementing organizations themselves, and risks and challenges to good governance at various levels of project implementation were identified (TIB, 2012).

However, there is no significant evidence available to validate the skills, capacity, integrity and accomplishments of the NGOs that have been selected to implement projects approved under the BCCTF and BCCRF. During the field level primary investigations by TIB, several allegations were placed regarding political and other undue influences during the approval and implementation process of those projects implemented by NGOs and private organizations, with BCCTF funding. To ensure the proper utilization of funds allocated to mitigate the effects of climate change, it is important to ensure the integrity, transparency, capacity, accountability, and guaranteed benefits to the affected populations through the planning and implementation of the projects. In this context, this research has been conducted with the objective of identifying the possible hazards that could undermine the transparency, accountability and governance in the process of monitoring the progress of the disbursement of the entire fund, and project planning, selection and implementation, as part of the process of monitoring the BCCTF, BCCRF as well as other related funding sources.

## **2. Objectives of the research**

The main objective of this research has been to examine the progress and governance challenges of climate finance in Bangladesh, and to recommend ways to overcome them. Specific objectives of this research were to:

- Examine the progress of climate finance in Bangladesh;
- Monitor the governance of projects approved under BCCTF or BCCRF that are implemented by government agencies;
- Monitor the selection process of projects as well as NGOs and private organizations approved by BCCTF, and examine the governance of some specific projects that have been implemented;
- Determine the recommendations and way forward.

## **3. Scope of the research**

This research, while monitoring the progress of climate finance, reviews the progress of funding for projects under the 6 funds (Bangladesh Climate Change Trust Fund, Bangladesh Climate Change Resilience Fund, First Start Financing, Pilot Program for Climate Resilience, Global Environment Facility and Least Developed Countries Fund) and through that, examines the pledges vs. allocation, the total allocated from each fund, and the funds granted to each implementer organization. Governance of funding mechanisms has been monitored on the basis of precise indicators established with regard to the selection and implementation of a predetermined number of government and non-government organizations and projects, under the BCCTF and BCCRF. It is notable that although the research presents the monitoring results of a limited number of organizations and projects under the scope of

the climate fund, it can still provide a comprehensive understanding of the challenges to governance in the management of climate funds in Bangladesh.

## 4. Research Methodology

This investigative research has been conducted through collecting data from both direct and indirect sources for qualitative and quantitative analysis regarding monitoring the progress of climate finance, project selection under climate finance, and governance of the implemented projects. This study has monitored the progress of climate finance, selection of public and private organizations or NGOs, as well as project approval under the BCCTF and BCCRF, and the governance in a certain number of projects implemented. The study was conducted from September 2012 to September 2013.

### 4.1. System of monitoring governance of projects approved under BCCTF and BCCRF

Among the series of projects that were authorized under BCCTF, BCCRF and other funds for which TIB continually monitors governance in project implementation, two projects – one each from BCCTF and BCCRF – were selected for monitoring considering these funds’ diversity, size, priorities of the required adaption, and the levels of threat to the affected communities. While monitoring the NGOs/private organizations who were engaged in the formulation, selection and implementation of projects funded by BCCTF, some 40 NGOs were reviewed through site visits. Three selected NGOs’ project implementation programmes were reviewed at the field level where extensive data was collected. The indicators/indexes that were considered for monitoring governance challenges in funds distribution, project formulation, approval and implementation are outlined below.

**Table 1: Indicators considered by the study**

Approval of climate finance (selection of organization and project) and project implementation	
	<ul style="list-style-type: none"> <li>○ Transparency/openness of information, e.g. data</li> <li>○ Political influence (approval of an institution and/or project, project implementation)</li> <li>○ Extent of climate change risks considered in approving climate funds</li> <li>○ Quality of project proposal and long-term impact of the project</li> <li>○ Institutional capacity, interagency coordination and human resources</li> <li>○ Participation of the local/affected communities in the process of project planning, and selection of project/area</li> <li>○ Expertise in climate change management especially climate change adaptation</li> <li>○ Accountability and any conflict of interest of organizations/workers involved in the project, risks to proper fund use, and effectiveness of the budget</li> <li>○ Engagement of local affected communities in the supervision and monitoring, and involvement of a third party for effective supervision</li> <li>○ Mechanism of accepting and addressing complaints</li> </ul>
Selection of NGOs/private sector organizations and projects	
	<ul style="list-style-type: none"> <li>○ Accountability of the decision-making individuals/board in the organization</li> <li>○ Expected results, and any delays in launching project activities</li> <li>○ Experience/capacity within the organization, priority given to climate change work in the organization</li> <li>○ Institutional structure and human resources in the project areas</li> <li>○ Political affiliations of the institutional steering committee</li> </ul>

- |  |  |
|--|--|
|  | <ul style="list-style-type: none"><li>○ Prior experience related to climate change</li><li>○ Practice of financial integrity</li></ul> |
|--|--|

## 4.2. Direct Sources of Information

### 4.2.1 Field visits to the project implementation areas:

- **Implementation of BCCTF and BCCRF funded national projects:** To collect information related to governance in project planning, approval and implementation in light of the mentioned indicators, site visits were made to project areas in Dhaka, Narayanganj, Barisal, Patuakhali, Pirojpur, Khulna and Satkhira, for data collection related to the planning and implementation of national projects that were realized with the BCCTF and BCCRF funds. Views of the local community and stakeholders regarding project activities were collected through interviews and focus group discussions.
- **NGO/private sector institutions and projects receiving BCCTF funds:** In the same manner, to conduct a ground-level site review of the selected NGO, and in light of the indicators listed above (Table 1) for all the NGOs identified by PKSf, information was collected from a wide range of sources.

### 4.2.2 Interviews and opinions of the project-related affected communities:

For the planning, implementation and supervision of projects under the BCCTF and BCCRF funds, the views of the communities in question were gathered through intensive monitoring and direct interviews, to determine the community's level of involvement with the project, to assess the appropriateness of the project towards climate adaptation and mitigation, and to identify the actual outcomes of project implementation.

### 4.2.3 Interviews with key informants:

- **Implementation of BCCTF and BCCRF funded national projects:** To collect information related to good governance in project planning, approval and implementation of those projects realized with the BCCTF and BCCRF funds, the research team conducted interviews and collected the opinions of entities involved in project implementation and administration including government offices, Ministry of Environment and Forest (MoEF), BIWTA, LGED, World Bank, PKSf officials, local populations, business associations and school management committees, contractors, advisors, civil society and third party officials engaged in the projects' supervision.
- **NGO/private sector institutions and projects receiving BCCTF funds:** Interviews were conducted with key informants to obtain information regarding the selected NGOs and the projects they implemented. The key informants were PKSf officials, representatives of civil society, the chief executive and the project lead in the selected NGOs, focal points in the various departments involved with NGO affairs, as well as key persons and investigative journalists in the project locality. The concerned populations in the project areas were intimately interviewed to explore whether the local authorities have taken any decisions

regarding their welfare with respect to the project, and whether the project is compatible with their lives.

#### 4.2.4 Hydrographic survey

For the projects implemented by BCCTF, TIB commissioned a hydrographic survey led by experts (June 2013) in the project areas (Haikkar Khal adjacent to Rayerbazar and Charargope in Narayanganj), to verify the amount of garbage removed through the project. Through this survey, information was collected regarding the actual volume of garbage removed.

### 4.3. Indirect sources of information

Information was collected through reviewing the rules related to the utilization of the BCCTF and BCCRF funds; project proposals of projects implemented by the public and NGO/private sector that were obtained using the Right to Information Act<sup>1</sup>, internet websites of different funds, research reports, and the prior verified newspaper reports. Additionally, information was also collected from other organizations affiliated with the fund recipient organizations. Furthermore, this research requested and obtained from the institutions concerned, copies of their project proposals, records, and project data.

### 4.4. Verification, quality control, compilation and analysis of data

Under this research, the data obtained from the field level has been compiled to the utmost detail, and the received data was verified with employees and officials affiliated with the project, local persons, contractors, journalists, and the information contained in the project proposals that were obtained using the Right to Information Act. In order to maintain the quality of the data, the researchers have communicated directly with the selected organizations (public and NGO/private) and has visited the project areas to discuss with the nominated implementing organization, key persons related to the project, and the local population. On the other hand, to maintain the quality of the hydrographic survey, TIB researchers participated in the survey supervision alongside the 2 hydrologists employed for the survey.

### 4.5. Limitations of the research

Due to the insufficient data available on fund management, it has not been possible to provide comprehensive analysis regarding the implementation area of the selected NGOs, the actual list of the beneficiaries, and what is the true nature of the work that is being accomplished with the funds.

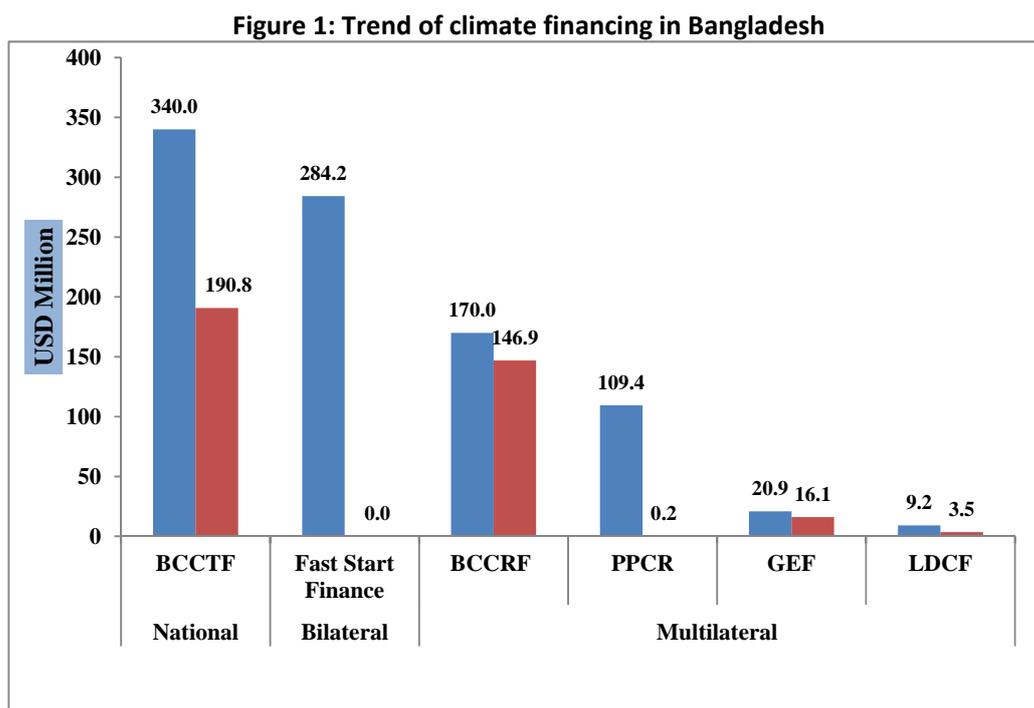
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<sup>1</sup> To obtain information related to the projects implemented by public and NGO/private sector institutions, and get a comprehensive idea about those, the research team sought the project proposal documents from BIWTA, LGED and 55 NGOs under the provisions of the Right to Information Act. It may be mentioned here that by analyzing the project proposals obtained, conducting field visits to the project sites, and through interviews with key informants, the information received about the project was verified and cross-checked, and following that the research results were determined.

## 5. Monitoring progress of financing through BCCTF, BCCRF and other international climate funds

To institute adaptation and mitigation programmes for addressing the effects of climate change, the Bangladesh Climate Change Trust Fund (BCCTF) was created under the Government of Bangladesh's revenue budget. At the same time, the Bangladesh Climate Change Resilience Fund (BCCRF) was created in 2010 with the financial support of donor countries and development partners. The World Bank is working as the fund manager of the BCCRF. In line with the Bangladesh Climate Change Strategy and Action Plan (BCCSAP) 2009 put forth by the BCCTF and BCCRF, projects authorized under six thematic areas are being financed. The sectors are, 1) Food security, social protection and health; 2) Comprehensive disaster management; 3) Infrastructure; 4) Research and knowledge management; 5) Mitigation and low carbon development; and 6) Capacity building and institutional strengthening.

It is notable that to implement the BCCSAP 2009 schedule, five billion dollars over five years, or on average, one billion dollars a year is necessary for the first five years (Clause 57 and 58, BCCSAP 2009). However, out of the USD 594 million that the developed countries (Annex 1) had pledged to Bangladesh until June 2013, the contribution realized for implementation is much less than the required amount.



Source: TIB research, updated June 2013

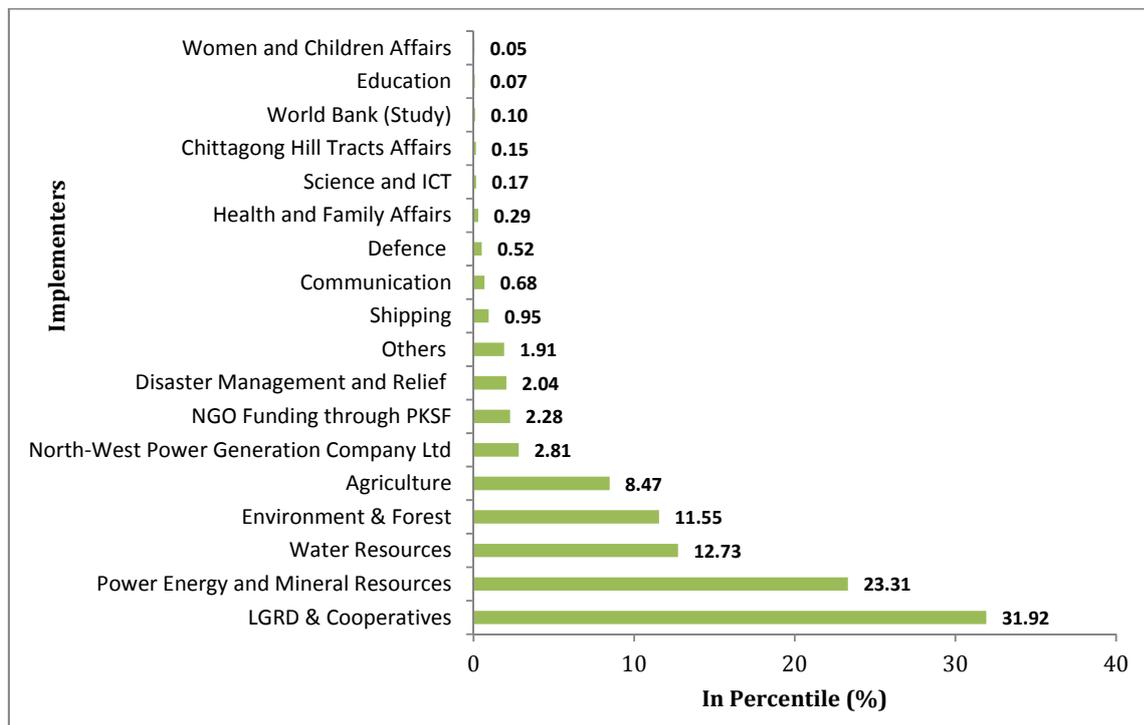
Until June 2013, a total of USD 190.78 million was realized against the pledged amount of USD 340 million from BCCTF, and the former is being used for project implementation through 139 public sector

projects and 63 NGO implemented projects. Out of the USD 170 million pledged by the BCCRF, a total of USD 146.9 million has been realized.

On the other hand, preliminary contributions of USD 0.19 million from the Pilot Program for Climate Resilience (PPCR), USD 16.1 million from the Global Environment Facility (GEF) and USD 3.5 million from the Least Developed Country Fund (LDCF), have been realized against their existing pledges of USD 109.4 million, USD 20.9 million and USD 9.15 million respectively.<sup>2</sup>

If the overall landscape of financing from various national and international funds (Figure 2) committed to the national level is categorized according to Ministry, we find that the Ministry of Local Government Rural Development and Cooperatives (LGRDC) is implementing projects of the highest value (USD 218.16 million), which is equivalent to 32% of the climate funds. Most of the projects implemented are related to construction of roads or cyclone shelters. The Ministry of Power, Energy and Mineral Resources ranks next, obtaining 23.3% of the climate financing from various funds (USD 159.2 million). This organization has obtained significant funds from the World Bank GEF. The Ministry of Environment and Forest has been involved in the decision-making, national and international networking, and coordination related to Bangladesh’s climate change activities, and this Ministry has received allocation of 11.5% of the climate funds for its authorized projects; however this institution has received the largest share of funds from the BCCTF and LDCF (Figures 2 and 3).

**Figure 2: Comprehensive project financing in Bangladesh according to Ministry/Division**

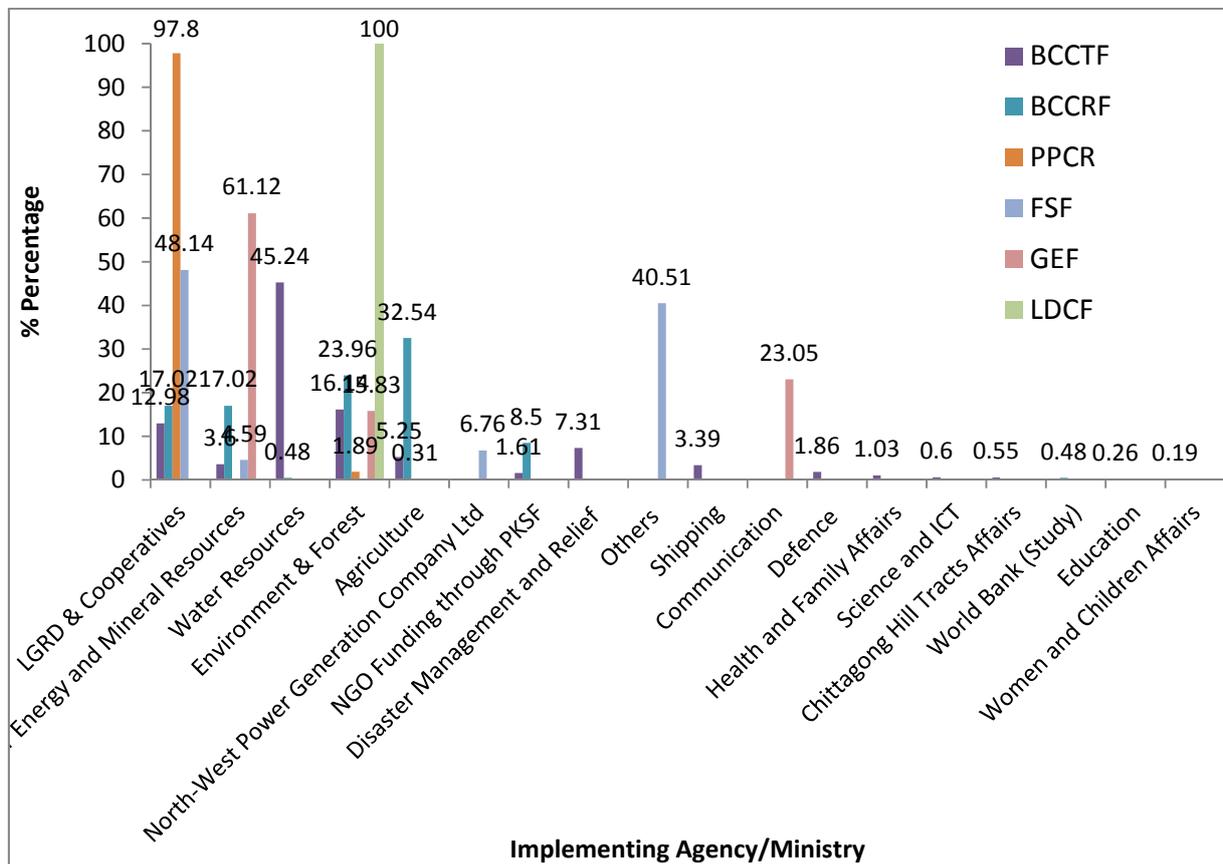


Source: Ministry of Environment and Forest (MoEF), World Bank and Climate Funds Update, June 2013

<sup>2</sup> Compiled based on information collected from the Ministry of Environment and Forest (MoEF), World Bank website and Climate Funds update.

Notably, USD 191 million has been allocated by BCCTF to government agencies for 139 projects. The Ministry of Water Resources has been authorized to receive the highest share of 45.2 percent of BCCTF for various projects related to dam construction, river and canal excavation, conservation of the river banks and preserving the navigability of rivers and canals. Meanwhile the Forest Department received 14.35 percent, Department of Relief and Rehabilitation 10.68 percent, Department of Environment 9.23 percent, and the Bangladesh Inland Water Transport Authority received 6.37 percent of the allocation. Other public institutions received the remaining 31.25 percent of the funds. On the other hand, the Ministry of Environment and Forest received the full 100 percent of the LDCF, the Ministry of Power, Energy and Mineral Resources received the highest allocation of 61.1 percent of the GEF funds, and the Local Government and Rural Development Ministry received the highest allocation of 97.8 percent of the PPCR funds.

**Figure 3: Funds received by the implementing agencies, across the funding sources**



Source: Ministry of Environment and Forest, World Bank website and Climate Funds update<sup>3</sup>

<sup>3</sup> Data scattered among various sources were collected and an overall database compiled to analyse the overall progress of the funding situation.

## 6. Monitoring governance in the implementation of public sector projects funded by BCCTF and BCCRF

The positive influences of climate change are making a direct impact on development programmes and on the quality of life for the affected communities. This is the reason it is important to ensure that the funds allocated for climate-friendly programmes for the communities most affected, are properly utilized. Under TIB's current monitoring of governance in climate finance two projects once each financed by BCCTF and BCCRF respectively, are monitored. Primary information related to the projects are given below (Table 2).

**Table 2: Project related data**

Source of fund	Name of project	Implementing organization	Estimated cost (million Taka)*	Implementation period
BCCRF	Emergency 2007 Cyclone Recovery and Restoration Project (ECRRP)	Local Government Engineering Department (LGED)	1,943.75	December 2008 – June 2013
BCCTF	To remove the accumulated polythene bags and other waste from Haikkar Khal adjacent to Rayer Bazar in Dhaka, and from Charargope Khal in Narayanganj	Bangladesh Inland Water Transport Authority	221.8	July 2011 – June 2013

\* 1 USD = 80 Taka approx.

Source: BIWTA and LGED, 2012

### 6.1. “Emergency 2007 Cyclone Recovery and Restoration Project” implemented through finance from BCCRF

#### 6.1.1 Project formulation and approval

The World Bank approved the Emergency 2007 Cyclone Recovery and Restoration Project (ECRRP) in November 2008. The project cost was USD 84 million, approved by the World Bank as a loan from the International Development Association. Later in August 2011, in light of a decision of the BCCRF Governing Council, USD 25 million was provided to this project from BCCRF. Under the scope of this project, it was decided that 56 new multipurpose cyclone shelters and 5 connecting roads would be built. The project is currently being implemented by the LGED in various coastal areas of Borguna, Khulna, Satkhira, Pirojpur and Patuakhali districts.

- **Infrastructural benefits of the shelters:** Although five types of construction models were created to mock up the new shelter construction under this project, the appropriate model design was ultimately selected for each locality based on the needs of the local community. Even though the cyclone shelters are normally used as schools or *madrassas*, in order for them to be used as shelters in times of disaster, there exist separate sanitation facilities for men and women, facilities for delivery and child-birth during emergencies including a separate

room with attached bathroom facilities, solar power and electricity, plus provision for rainwater harvesting.

- **Selection process of the land/location:** The *upazila* or sub-district education committee assesses the possible locations for the school and the cyclone shelter. This committee consists of elected people's representatives, the local chief executive Upazila Nirbahi Officer, Hon'ble Members of Parliament and many others who determine the location and finally settles the construction location, subject to consultations with the Ministry of Primary and Mass Education. In site selection, some of the factors considered are whether there are any other shelters located nearby, if it would offer sufficient capacity for 1,500 persons, whether the locality is prone to floods, whether schools/*madrassas* can be managed from there and whether it would be appropriate as a shelter, among other things. However in some places, local personalities have donated land owned by them, towards the construction of cyclone shelters. Depending on the design schemes, there is variation in the construction costs of the shelters, however most falls into the range of Taka 17.5 to 23.0 million. It is notable here that although the World Bank, through surveys, collects information on the soil test, the land measurement, and polls the social conditions of the locality (area demographics, number of children in schools, etc) prior to the start of construction, project affiliates report that the World Bank does not influence the process of selecting the location which is left to be determined by the numbers of persons who would avail the shelter in crises.
- **Selection of Contractor:** In any project, if the costs and the bid value does not exceed Taka 35 crores (350 million) then the call for bid submission is made from the *zila* or district level, else if the bid value is higher than that amount, then the bid documents can only be collected at the central level. The call for the bid documents for the cyclone shelters are made on the basis of a number of packages. For instance, bid packages have been made with any number of cyclone shelters – 2, 4, 8 or even up to 24 shelters – and then a call for bids from interested parties, made. When contractors submit a bid, they must do so for the entire package. For every package, the bidding advertisement must be circulated by placing in two national newspapers by rule (one Bangla and one English). However the bid package that was created to include 24 cyclone shelters was also advertised abroad for bids through International Competitive Bidding.

#### 6.1.2 Monitoring governance in the implementation of a project

- **Publication of incorrect information and lack of transparency:** Although the BCCRF was established by the developed countries (Annex-1) to provide “new” and “additional” funding as compensation, however in principle this funding is not a donation in any sense, but actually monetary reparations, from the prior industrialized nations to the developing nations, to compensate for the former's contribution to climate change. However field reviews show that the information regarding BCCRF-funded projects that exists at the ground level, generally presents it as a loan that originated from the World Bank (refer to Figure 4). However it is not clear with what justification if any, a project that already received an approved loan from the World Bank, would qualify to receive BCCRF funding. According to the concerned officers of

the LGED, creation of the Detailed Project Proposal of any project is a time-consuming affair and as the objective of the BCCRF-funded project is also aligned with shelter construction, thus the financing from this source is related to the ongoing World Bank supported project. The officials further stated that in this ongoing World Bank project, the design or construction framework of cyclone shelters, the construction costs, construction agency and other matters were predetermined, and therefore the work of this project was facilitated further with the influx of USD 25 million. In the publicized information, why this donation was indicated as IDA, and why the World Bank was indicated as the source of financing, was not sufficiently justified by the government officials to anyone's satisfaction. It must be noted that the true nature of the funds (loan or grant) was not known to the local officials of the implementing agency either.

It should be clarified that the World Bank does not provide any finances to the BCCRF, rather for a set administrative fee (4-5%), acts as the manager for the allocated funds. And as a result of indicating the World Bank as a source of funding, it is not possible to show the achievements of the BCCRF project separately.

**Figure 4: Information board related to a BCCRF project**



On the other hand in most areas, especially in the remote and inaccessible locations, the contractors' representatives had reportedly not contacted the local community on any of the issues. In Golachipa Upazila of Patuakhali where there is a primary school cum cyclone shelter in Hogolbunia one schoolteacher indicated that the local school management committee (SMC) had not been shared any project schedule and the local school management committee was for all practical purposes, completely disconnected from the project supervision. As the construction schedule was not publicized to the local population, the supervision of the project has suffered and therefore the quality of the work could not be fully ensured.

- **Limited participation of the affected populations in the formulation and implementation of the project:** Despite the requirement of the participation of the affected target population at every stage of implementation of climate adaptation and mitigation related projects, the elected people's representative, the local chief executive Upazila Nirbahi Officer, local Members of Parliament and local influential persons were consulted, but in many locations, the process of site selection and the supervision of construction work has not involved the school committees or the local communities (Source: Key informant).

- **Political influence and intimidation used in the selection of contractors:** In the project implementation area, it was learnt through discussions with various stakeholders and local persons that the project preparation, contractor selection and implementation phase had all been subjected to interference and political influence of local influential quarters. The team learnt of allegations in Jhalakathi involving the local affiliates of one political party, using influence and intimidation to bag three contractor packages (Source: Key informant).
- **Breach of public procurement rules and hiring of sub-contractors:** It was observed during inspections of the project areas that sub-contractors had been engaged by the main contractors in complete breach of the procurement rules. Although the selected contractor was present in theory, the committee informed that in reality, multiple shelter constructions had been assigned to hired local sub-contractors. In *Baufol* of Patuakhali District, although one contractor had been selected to implement a package of four cyclone shelters, the main contractor had hired a sub-contractor for the construction of two out of those four shelters. The officials of the LGED expressed that, “This type of package bidding system excludes the local contractors who may not have the requisite capital. The contractors in possession of sufficient capital, who are selected through the bidding are either influential or possess significant wealth.”

**Box 1: Justification of modifying project estimation based on location**

In project implementation area “A”, a Field Resident Engineer employed under the provision of third party oversight informed that in remote, inaccessible areas due to difficult communication, contractors in many cases cannot participate in the tender process, and one tender can even be advertised more than once. This therefore delays the progress of the project. Some contractors even noted that due to the increasing market price of iron rods, cement and other materials, the budget that they were working with, was exceeded, and they would not be left with any profit. Though the provision to spend up to 30% more than the budgeted amount may exist, many contractors – in order to be successful in the bidding – only make a provision of up to 5% increase in the budget when participating in the bidding. In the view of the local engineers, better quality of construction output could be ensured if the bids were placed with a provision of 20% increase in the budget. Several Field Resident Engineers claimed that for the more remote areas, for instance Satkhira District, an additional budget for construction should have been taken into account, which the World Bank had failed to do.

- **Delays in project implementation:** Although the ECRRP began to receive funds from BCCRF from 2011, it was observed during the inspection that the work had not even started in some selected districts, while in others, the progress stood at various degrees from the piling stage of building to other different stages of completion. Although the ECRRP project was slated to finish in June 2013, the project officials expressed their optimism that the project should finish sometime in 2014.
- **Poor quality of work during the implementation phase, and accountability:** The project budget is generally estimated after taking into account the share of profit of the contractor. However as there exists no such projection with respect to engaging a sub-contractor, it is resulting in the use of low-grade building materials on the part of the sub-contractor, which is

directly compromising the quality of the project construction. The use of low quality building materials is reducing the durability of the shelters; as a result, local persons who are aware of the situation are claiming that there is a very real possibility of a grave accident in the future. Although the local persons have expressed their satisfaction with the quality of work in some of the ongoing construction, they have placed the following complaints regarding some of the low quality project construction –

- Use of substandard stones, sand and iron rods in the construction; due to the lack of proper supervision, in some cases it has even been observed that concrete mix poured on to the iron rods was clogging up in some spots but the workers nonetheless continued pouring, ignoring best practices of work, and without correcting the unevenness;
  - The lower layer of the casting used inferior quality of mud and sand mixed pebbles and low-grade stones; the higher layer used relatively better stones, but for the casting, the stones were neither cleaned nor sorted before being used. Despite initial complaints from the district office regarding the construction material being used, the work continued afterwards using the same substandard bricks, stones and iron rods;
  - At the time of pouring concrete, some locations used saline water, reducing the overall durability of those shelters;
  - Despite a rule that only red sand from Sylhet may be used for the concrete casting, instances where inferior white sand is mixed with the red, have also occurred;
  - According to local teachers, the connecting roads to the schools in their locality that were made under this project used substandard bricks that were even worse than burnt clay. When the district executive engineer was contacted regarding this complaint, he informed that due to the substandard quality of the ingredients being used in the construction of the roads, the work is halted. He informed that work will resume after all the materials have been examined.
- **Absence of a method to address complaints at the level of project implementation:** The local population complained that in a few cases, the district engineer and the contracting agency was unwilling to entertain or address the opinions and objections of the local people. On the other hand, when the irregularities committed by the contractors were brought to the attention of the higher officials, one guard was precipitously discharged, which is also not a permanent or sustainable solution to the problems.

#### 6.1.3 Quality of project implementation and the efficacy of supervision

- **Efficacy of project monitoring by LGED:** The physical distance from one cyclone shelter to the other, the absence of the LGED officials in some project areas, and the absence of proper monitoring is directly impacting project quality. The Satkhira area Field Resident Engineer claimed that due to the system of a uniform budget across all project areas, the contractors are attempting to only produce substandard output and trying to deliver low-grade building materials. Additionally, according to local school committees' representatives, World Bank personnel affiliated with the project and concerned LGED officials did not undertake sufficient monitoring of the project in inaccessible areas.
- **Participation and effectiveness of the school committees in monitoring the construction work:** Though the school management committees were involved in monitoring the project activities at the local level, it was found that in some areas, their involvement with the project was non-existent. For instance, although there was a requirement to form a committee with the locals of Baufol in Patuakhali district during the project inspection period (September 2012), no committee was formed. However it became evident that the effective participation of the school management committee played a large part in ensuring the overall quality of the construction work (Box 2).
- **Efficacy of third party monitoring:** In order to carry out monitoring of BCCRF projects alongside the LGED, the World Bank jointly recruited as third party consultants, Wilbur Smith Associates and Resource Planning and Management Consultant (pvt.) Ltd. On behalf of the two consultancy firms, to ensure regular local monitoring of the project programming, a Field Resident Engineer (FRE) was recruited.

**Box 2: Effectiveness of monitoring by the local school management committee**

To maintain the quality of work in its cyclone shelter construction project, *Rahmatpur* Government Primary School assigned the responsibility of monitoring to the school management committee at the project outset. The schedule of the construction work was kept open at the school under the guidance of the headmaster and the chairman of the school management committee. As the committee's monitoring system was strong the contractor – even when he attempted to hide certain actions from their knowledge, did not manage to do so due to the strong protest from the school committee; for instance when the contractor tried to deliver substandard stones at first, they could not do so, due to the mobilization of the school committee. Hired as third party observer, FRI and the LGED responsible engineer were very hands-on in the project. The Chairman of the school committee knew electrical work well, and therefore was able to monitor this aspect of the project intimately. During the project implementation, LGED officials were in regular communication with the headmaster and the school committee.

However the reverse has also occurred. During the construction of the cyclone shelter in *Hogolbunia* in *Patuakhali*, where the project location is a remote village where communication is difficult, neither did any effective monitoring take place, nor was any data or the project proposal or the schedule shared with the local school committee or the people. (Interview, school management committee, 2012)



In discussions held with the FREs of various sub-districts of five of the districts where the project activities are ongoing, it has been possible to establish the independence and effectiveness of third party monitoring -

- According to the FREs, some of the dishonest government officials and staff from the agencies that are implementing the project try to reap benefits from it at various stages. In some cases, if pressure is created at the local level to expedite the project implementation, then representatives of local influential persons and the contractor agencies react by attempting to bribe the project implementation agencies, even resorting to harassment and intimidation of the project personnel if the offer of bribe happens to be rejected. In some cases, the political heavyweights who may be present at the local project implementation level, may even manage to transfer the project official to another geographic area altogether. The local influential persons often enter into a transactional relationship with the officials and staff of the implementing agencies, and furthermore establish an arrangement with the contractor agencies involving illegitimate financial interest. As the FREs as the third party, come between the two entities partaking in an illegitimate financial relationship and thereby impede the process of corruption, they must often deal with threat and intimidation with promises of even death threats if they report the truth (direct interview, September 2012). FREs are generally in a position of pressure from both LGED, and the contractor agencies. In one location, it has been known that the position of FRE has been recruited 12 times within one year as the persons quit the position quickly. Although the FREs should be present in the field at all times, in reality that does not remain possible due to conflicting pressures, and thus the monitoring aspect of the project suffers.
- FREs do not have their own separate offices, and sitting inside the LGED office, in many instances they cannot function independently. For instance, the FRE is often obliged to sign on the permit 'endorsing' the procured materials even before receiving the actual quality report, in breach of all the project rules, as a result of heavy pressure from the affiliated Engineers.
- The FREs are also subjected to pressures from the local contractors – they are pressed to sign off on bills without examining the actual materials, however on this issue, the Project Director and the Deputy have indicated that they have not received any such complaints implicating the contractors, rather the FREs are the ones who do not want to observe their own responsibilities and travel to the remote project areas. They apparently also quit their jobs as soon as they find a better position. Overall, the cyclone shelters being built to protect the victims of disasters resulting from climate change are experiencing strong political influence, and a prevalence of a tendency among some contractors and the project officers and staff, to reap illegitimate benefits, and therefore increase the risk to the vulnerable populations even more.

## 6.2. Inspection of implemented projects financed by BCCTF (Projects for the removal of accumulated polythene packets as well as other waste in Haikkar Khal adjacent to Rayer Bazar in Dhaka and Charargope Khal in Narayanganj)

A news report titled “To whom do you belong, Haikkar Khal?” published in a daily newspaper brought the attention of concerned officials to the issue, following which BIWTA took up the project titled “Removal of Polythene Garbage from Haikkar Khal in Dhaka and Charargope Khal in Narayanganj”. Over time, the Buriganga River has become polluted with the dumping of a range of different waste materials, causing much difficulty and regularly disrupting sewage disposal in the neighbourhoods of Dhanmondi, Rayerbazar, and Jigatola due to water logging. Aside from this, due to the practice over the last 100 years of dumping industrial waste into the Shitalakkhya River (particularly the wastes from the tanneries in Hazaribagh, the dyeing factories on the riverbank and the refuse from many other industries), human waste and solid waste (polythene, garbage, soil and sand), the bed of the Charargope basin in Narayanganj has become fully covered with that garbage. Taking all these factors into account, the project formulation has taken place to extract polythene and other wastes from the Haikkar Khal adjacent to Rayer Bazar in Dhaka, and Charargope Khal in Narayanganj, with the goal of increasing the water supply, improving the environment and clearing the garbage dumping from the banks of the canals. The project was initiated with the support of the government’s district administration, especially the Bangladesh Inland Water Transport Authority, and authorized on 23 March 2011. The project area includes Haikkar Khal adjacent to Rayer Bazar in Dhaka, and Charargope Khal at the boundary of the Narayanganj Port. The project proposal clearly refers to polythene and other waste materials removal from along 2.735 kilometres of Haikkar Khal, and from 2.26 kilometres of Charargope Khal. The project costs were estimated at Taka 22.18 crores (14 crores for Narayanganj area and Taka 8 crores for Haikkar Khal area).

### 6.2.1 Good governance in project formulation and approval

- **Approval of project without addressing the sources of environmental pollution:** A huge quantity of untreated waste effluent from the leather treatment industry flows into the Haikkar Khal on a daily basis through the sluice gate next to it, and therefore the renewed navigability that should emerge after the removal of the garbage, is not proving to be permanent. Due to the lack of any effective coordination with Dhaka WASA and Dhaka City Corporation, these organizations have not played any role throughout the implementation of this project. The contractor expressed that, “In some locations on the river, the project has dug down to 12 feet deep, however after 15-16 months, the condition of the river has returned to being the same as previously, which raises some serious concerns regarding the sustainability of the project. The project director has also expressed similar concerns. He said, “The canal was dry earlier, but navigability has increased after the dredging took place. However now effluent is regularly flowing into the canal through the sluice gate. The tanneries at Hazaribagh dump their industrial waste at the mouth of the sluice gate. At this rate, the locals believe that the canal would not even exist in ten years’ time. The Dhaka WASA should be sufficiently mobilized to ensure that waste and garbage are not dumped at the mouth of

the Rayer Bazar sluice gate. If the people of that neighborhood cannot be made sufficiently aware about not allowing garbage and mud from outside to flow into the canal, then the canal would overflow with waste once again, and the impact of the project would not sustain, and may be reversed.

- **Interagency coordination in the project's formulation and approval:** As this project to eradicate polythene and other disposed waste has been taken up in two discrete locations, a good number of other institutions are also involved with it. In that regard, the nature of work, the amount of construction to be undertaken, and the amounts of funds allocated also vary depending on the location of the project (Table 3). On the other hand, both locations are local commercial hubs and river ports, and are fully used to transport goods and materials regularly. As a result, due to their existence as business hubs on the river route, the locations are of high importance to traders of local bricks, stones, sand and fish, and the port labour agencies and their leaders are the key stakeholders and users of the project outcomes. Out of the two locations covered by this project, Haikkar Khal is the one that falls within the authority of the Dhaka City Corporation, BIWTA and Dhaka WASA. On the other side, the project work in Narayanganj falls within the jurisdiction of the Narayanganj City Corporation and has involved the local business community and the port labour and owners' associations. However, although coordination was essential between BIWTA, Dhaka and Narayanganj City Corporations, Department of Environment, Water Development Board and local commercial businesspersons at the port and the labour and owners' associations during the formulation of the project, the project did not manage to accomplish that.

#### 6.2.2 Good governance in the implementation of the project

- **Justification of the project:** As the areas identified as most climate vulnerable by the Bangladesh Climate Change Strategy and Action Plan (BCCSAP) 2009 does not include the areas under Dhaka City Corporation's jurisdiction, and furthermore because this particular jurisdiction is one where many other public institutions are delivering similar services, the allocation of resources from the BCCTF to this particular area should be made after much deeper deliberation on sustainable impacts. It must be brought to relief that the climate affected people in Bangladeshi coastal areas are yet to fully overcome the disastrous consequences of tropical cyclones Aila and Sidr, due to the absence of adequate programming for climate adaptation<sup>4</sup>. Local residents claim that if this project was not adopted, then there existed a serious likelihood of two real estate firms grabbing the riverbank areas of Haikkar Khal, and it was therefore imperative to clearly demarcate the river's boundaries. As part of the boundary determination, the six feet wide roads constructed on either side of the river, as well as the riverbed dredging, has temporarily improved the navigability of the river. However specialists insist that these wins cannot be permanent if the climate change projects cannot ensure the participation of all stakeholders, involve interagency coordination, and guarantee the overall quality and progress of the work. At the same time, it will also not be possible to address the effects of climate change rather the funds allocated would be wasted.

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<sup>4</sup> <http://www.thedailystar.net/beta2/news/50-squar-km-turned-into-wasteland/>

- **Lack of coordination and exercise of undue influence:** Even though it is a requirement for the mentioned organizations to maintain interagency coordination to ensure successful implementation of the project, the team observed that no coordination had been achieved between the Water Development Board, City Corporation and Dhaka WASA. On the other hand, as a result of the sprawling open markets over an extended part of the project area in Charargope of Narayanganj, there accumulates large volumes of rubbish there every day. BIWTA has arranged for the creation of 20 garbage bins and one garbage point located in that area, to facilitate the collection of garbage. The BIWTA officials claim that the garbage trucks of the City Corporation remove the collected garbage once a week, however the local businesspersons differed with that view, asserting that the City Corporation vehicles are hardly ever noticed in the area, and that it is well known that City Corporation lacks the required resources for proper garbage removal. Compared to the approval received from the local businesspeople at the start of the project, they expressed far higher scepticism at the end with respect to the permanence of the solution instituted. They believe, to ingrain the results of the project, the BIWTA and the City Corporation must coordinate at the end of the project implementation to take up some subsequent initiatives. City Corporation officials remarked, there should have been a system of regular monitoring to be carried out even after the end of the project implementation period. Otherwise, the intent with which the rivers and canals were excavated would not yield long-term results.
- **Political and other undue influence:** The key informants observed that political influence was exercised in the recruitment of the contractor, and ultimately a close affiliate of a powerful politician was given the contract. The local residents affirm that in the project implementation areas, there exists strong presence and control of land grabbers. Initially these persons resisted the launching of the project. Even the ground-breaking ceremony had to take place with police presence and the project had to resort to legal measures to begin its work. Those persons who were recruited to carry out project monitoring, also could not avoid the land grabbers, who attempted to influence them through various means.
- **Non-implementation of the permanent garbage point:** During an inspection of Haikkar Khal, on the Rayer Bazar area segment of the River Buriganga, it was observed that despite its inclusion in the project proposal document, no garbage point had been created for the dumping of the waste excavated from the riverbed. When the contractor was approached on this matter, he explained that the project area was under the management of the Water Development Board which means that the creation of the garbage point was subject to permission from the Water Resources Ministry which is heavily time consuming. He further added that after a two-month wait for the said permission, the project moved ahead without creating the garbage disposal point. The financial report of the project stated that, "Taking into account all the practical issues involved, the project steering committee had recommended that the garbage point may not be constructed in the Haikkar Khal section."
- **Lack of transparency with regard to the unspent balance:** The project proposal projected the removal of 416,600 m<sup>3</sup> of waste material. The financial report of BIWTA mentions that

garbage amounting to 360,000m<sup>3</sup> would be extracted from an area of length 5km, at the cost of Taka 60.72 lakhs. Discrepancy was observed between the length of the river area planned in the project proposal, and the length of river area actually completed, and the figure for project expenditure is not in agreement with the figure that is allocated in the project approval (Table 3).

**Table 3: BIWTA's project proposal, financial report and comparison against TIB survey**

Proposal/Report	Length of garbage removal area (km)	Amount of garbage removed (thousands m <sup>3</sup> )	Expenditure (million Taka)	Unspent balance (million Taka)
<b>Project proposal (proposed)</b>	----	416.6	109.975	54.535 (compared to project proposal)
<b>BIWTA financial report</b>	5	360	60.72	5.28 (compared to BIWTA financial report)
<b>BIWTA survey</b>	2.67	230	60.72	
<b>TIB's hydrographic survey</b>	2.67	210	55.44*	

*\*Calculated per the estimated cost for removing each m<sup>3</sup> of garbage (Taka 263.98) in the project proposal*

Source: TIB hydrographic survey, BIWTA financial report and analysis based on the project proposal, October 2013

Although the BIWTA financial report states that the area over which garbage has been removed during project activity, covers 5 km, analysis of the data and information contained in the hydrographic survey of BIWTA reveals that the stated distance is actually a length of 2.67km. If the data and information of the TIB hydrographic survey is compared with those of the BIWTA hydrographic survey, then it becomes evident that Taka 5.28 million was spent for garbage removal. Then if the TIB's hydrographic survey is compared with the data and information in the project proposal, then it is seen that Taka 54.535 million should remain unspent.

**Table 4: BIWTA's position, and comparison with the TIB study**

Fields related to project cost	Allocation (million Taka)	BIWTA's position	TIB's monitoring
<b>Communication and dissemination</b>	1.8	Entire funds were spent	Local population not informed about the project programming
<b>Public awareness activities</b>	1.8	Has been done	Only 7 signboards visible
<b>Eviction drive</b>	2.0	Has been completed	There is some ambiguity regarding the actual project expenditure
<b>Garbage collection point</b>	2.0	Has been completed	1 out of 2 has been completed
<b>Tree plantation</b>	2.2	Has been completed	Local people carried out plantation programmes with their own funds
<b>Hydrographic survey, engineering survey and soil test, walkway, clay roads, boundary wall, and computer and printer have been procured</b>			

Source: Project proposal, field inspection, and interviews of the local population, June 2013

On the other hand, the existing risk that is of greatest concern that this study has identified through the field visits of project sites, reviews of the project proposal and discussions with the stakeholders, is that of the non-realization of the project goals. Aside from that, there was specific mention and budget allocation in the project proposal regarding the recruitment of 2 advisors for 3 months to support the project implementation. However the proposal did not elaborate on the responsibilities of these specialists and field level interviews with the BIWTA officials revealed that the project did not recruit any advisors. It has not been explained why, even though there is mention of these advisors in the proposal, none were hired. Therefore, the funds allocated for the engagement of advisors, has remained unspent.

- **Lack of awareness raising activities:** Although public meetings have been organized to raise awareness of the local businesspersons, however the impact of these meetings is minimal. It was crucial to incorporate some more activities into the project to raise the awareness of the general population regarding hygiene and cleanliness, which is absent from the approved project document.
- **Ineffective monitoring and evaluation:** The project proposal mentioned the creation of a 10-member steering committee and a 5-member monitoring committee. According to the work plan, it was the main task of both the committees to review the progress of project implementation and provide recommendations. The financial report collected from BIWTA mentions that the steering committee has inspected the project area; however local businesspersons and BIWTA officials believe that as there is no provision for regular monitoring after the end of the project implementation period, the objectives with which the project had been designed, may not be fully realized.

## 7. Selection of NGO and private organizations, and oversight of project implementation

Since 1990 when PKSf was established as an autonomous government body, PKSf has been working effectively in partnership with more than 260 NGOs on micro-finance, employment generation and improving the living standards of the underprivileged. In this case, though the Board of Trustees of BCCTF appointed PKSf to select organizations and projects for providing funds to NGOs and the private sector, the Ministry of Environment and Forest has published only one notice on behalf of BCCTF regarding responsibility being placed on PKSf on this matter. No Memorandum of Understanding or contract papers were published outlining the execution of these responsibilities. However, in the contract between PKSf and the fund recipients it is stated that, “upon the request of the Bangladesh Climate Change Trustee Board (BCCTB) and with the power bestowed by the Bangladesh Climate Change Trust (BCCT)<sup>5</sup> of the Ministry of Environment and Forest of the Government of the People’s Republic of Bangladesh, the “Foundation” provides BCCTF funds according to the relevant policies of said fund.” As per these terms, PKSf has been designated as the “Foundation” and PKSf signed as the first party to

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<sup>5</sup> According to records index পবম/সিইসি/ট্রাস্টি বোর্ডের সভা/৫৬/২০১২/(অংশ-৩)/৬৩৮, dated: 13/08/2012

the project contract. To all project/fund recipients “Foundation” is the legally recognized representative, interest associated successor, administrator and the fund-distributor”<sup>6</sup>. The comprehensive process of selecting NGOs between 2011 and 2013 is described below:

Step-1: Bangladesh Climate Change Trust (BCCT) (previously CCU) invited for proposals for NGO projects in 2011 and more than 5000 project proposals were submitted from the NGOs. Among those proposals BCCT primarily selected 53 NGO projects for fund allocation;

Step-2: After reports about corruption and dishonesty in the selection of NGOs were published in the newspapers BCCT suspended the distribution of funds in August 2011;

Step-3: In November 2011 BCCT again assigned PKSF to reevaluate a total of 131 NGO project proposals including the ones previously rejected;

Step-4: In 2013 PKSF finally selected 55 NGOs/private organizations for fund provision. But BCCTF Trustee Board later included 8 more NGOs and gave the responsibility of releasing fund for these 63 NGOs to PKSF.

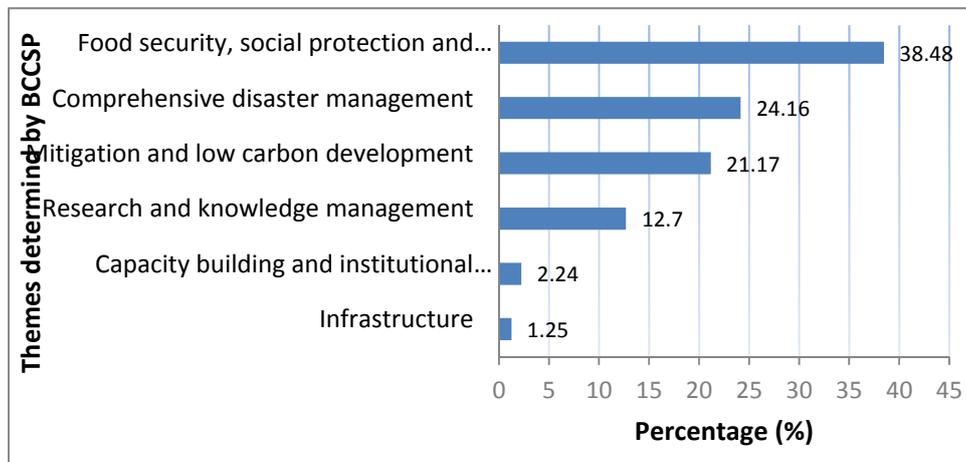
**Selection of NGOs/private organizations and projects from BCCTF and allocation of funds:** Bangladesh has been successful in setting an example of community-based adaptation project implementation, for the other countries of the world. As the NGOs and community based organizations are experienced in working at the grass-roots level, therefore BCCTF/BCCRF decided to implement the adaptation projects through the NGOs/private organizations. The research shows that, the 55 projects being implemented by NGOs have already been allocated Taka 250 million and 26% of the allocated fund has been approved for adaptation (for infrastructure and comprehensive disaster management).

The allocation of Taka 45.5 million to the disaster management sector is 24.16% of the total allocation to the NGO sector. It should be mentioned that, among the 55 organizations, most of the organizations have received Taka 2-3 million on average, but 2 NGOs in the disaster management sector have received Taka 33 million. The highest amount of allowance have been provided to the 22 projects in the food security, social protection and health sectors which amounts to 38.48% of the total allotment to the NGO sector. Although climate adaptation is prioritized in Bangladesh, 21.17% of the total allotment has been approved for forestry for mitigation and carbon emission reduction. On the other hand, allotments in the research sector and capacity building are 12.07% and 2.24% which is inadequate compared to the total allotment. Although the highest amount of 38.48% has been allocated to the food security sector, it is not certain who the true beneficiaries are and how they would be selected. The reasons behind larger allocation in this sector are challenges including political influence and misuse of power (Key informant, 2013). Note that, an ex high official of an organization that has received relatively more fund allowance is now associated with BCCTF’s decision making process for project selection and final approval.

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<sup>6</sup> Contract regarding project implementation by NGOs under the climate change trust fund

**Figure 5. Prioritized sector/theme for NGO fund allocation**



Source: Projects list provided by PKSf, 2012

## 7.1. Monitoring good governance in the approval of institutions and projects

### 7.1.1. Openness of information and transparency

Although PKSf was given the responsibility of managing the climate fund for the NGO/private sector, they were also given the charge of selecting and verifying 131 projects out of a combined list of 53 projects previously selected by BCCT, plus another 5000 projects in this sector. Even though there has been some scattered information about the selected NGOs in the newspapers, BCCT or PKSf have not yet published any report or list of them as such.

With regard to this, under the provisions of the Right to Information Act, TIB collected the names of the 55 selected organizations and their submitted project proposals, from PKSf. This list, against each selected NGO, provides the information on the name of the project,

address, amount of funds allocated and sector (theme-based). Subsequently, when TIB applied to BCCT with a request to obtain the project proposals under the provisions of the Right to Information Act, the application was declined by BCCT who stated their inability to comply with the request, and furthermore suggested that TIB request PKSf to obtain the same project proposals. When this request was lodged to PKSf accordingly, they declined to provide any elaborate information about the proposals with the pretext that BCCTF did not provide the necessary permissions for this. Under the circumstances, the existing challenges to ensuring the

#### **Box 3. Lack of transparency in selecting NGO/private organizations**

Under the provisions of the Right to Information Act, TIB requested to obtain the project proposals both from PKSf and the selected 55 NGOs, however PKSf declined to oblige, claiming that they did not have the necessary permissions from BCCT. The matter has not been settled to date. On the other hand, only 21 (38%) NGOs have sent their proposals while the other organizations have not sent any information yet. (TIB, 2013)

availability and transparency of information with respect to the selection, approval and implementation of projects by NGOs/think-tanks/private organizations may be enumerated as:

- Even though BCCTF has enlisted PKSf to provide funds to the NGOs/private organizations, and carry out all responsibilities regarding selection of organizations and their respective projects for implementation, there exists no written memorandum of understanding/specific guidelines (that elucidates the selection process, autonomy in decision-making, extent or range of responsibilities, integrity, mitigation of conflict of interests, practice of fairness, accountability, as well as financial and other liabilities) that has been published or were mandated to be observed in the affiliation between PKSf and BCCTF, except for one notice<sup>7</sup> on the matter;
- The lengthy and circuitous process of obtaining information since the obligation of BCCTB, PKSf and selected NGOs with respect to publishing information (both its nature and size) has not been clearly specified;
- BCCTB's omission in publishing the evaluation reports regarding the primarily authorized project proposals and the evaluation of the 131 selected NGOs/private organizations;
- The omission made by both PKSf and BCCTF to publishing on the website, any information or list regarding the selections made until June 2013 of the first 63 projects for implementation by the approved NGOs/private organizations. It has been mentioned in the contract between PKSf and the approved organization that "the result of any survey or study cannot be published by any organization receiving grant from BCCTF without the permission of BCCTB"<sup>8</sup>, which has served to effectively discourage the implementing organizations from providing even general information related to the climate project (primary interviewee, 2013). Some NGOs even refused to provide project proposals and project-related necessary information without the consent of the Ministry and PKSf.

#### 7.1.2. PKSf's prior experience in relation to climate change

PKSf has prior experience in micro-credit and other programs but it has no experience in climate fund management and selection of related projects, supervising their implementation and evaluation of these projects. Moreover the personnel recruited by PKSf at the field level for the implementation and supervision of projects, were assigned responsibilities without any initial training on evaluating climate change projects (primary informer, 2013), thereby introducing greater challenges to evaluating the progress of actual climate adaptation. The research has shown that most of the selected organizations are inexperienced, while there are concerns related to their structural soundness and credibility.

#### 7.1.3. Availability or transparency of information of the selected organizations

In this era of information technology, even though it is essential for an organization to have a website to publish information, or more importantly, to disseminate information about

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<sup>7</sup> [http://bdlaws.minlaw.gov.bd/bangla\\_all\\_sections.php?id=1062](http://bdlaws.minlaw.gov.bd/bangla_all_sections.php?id=1062)

<sup>8</sup> Clause 1.19 in the implementation agreement for BCCTF

institutional activities, among the 55 NGOs funded by BCCTF, only 19 have their own websites. Nonetheless, even those NGOs have not published any information related to the BCCTF project. Then again for those NGOs who do not have a website, their only means of presenting and disseminating information to the wider world is through the publishing of their annual report, which they do not do regularly. One NGO that provided its Annual Report to one of the TIB researchers subsequently took it back on the premise that the report's contents were confidential. Considering the overall restrictions in information-sharing, the greater public does not have any access to information regarding the location or the condition of projects being implementation by the NGOs/private organizations or even who the projects benefit, and how. Although the wider public and various organizations are interested in the information regarding the projects implemented by NGOs/private organizations under the Bangladesh Climate Change Trust Fund, there is an overall deficit of relevant information regarding this.

#### 7.1.4. Risk of climate change and priorities for financing

In the overall approval and implementation of NGOs' projects by BCCTF, among 55 NGO projects the highest figure of 19 projects were approved for tree-plantation, 12 for water and sanitation, 12 for social awareness, 5 in research, 3 for livelihoods and income generation (agriculture, fisheries), 2 for technology transfer, 1 for agriculture and 1 for capacity building. Even where PKSF was tasked with the responsibility to review the NGOs/think tanks and project proposals, shortlist the organizations and give primary approvals on behalf of BCCTF, the final approval for the projects was granted by the BCCTF trustee board (BCCTB). In the context of Bangladesh, the risk map drawn up by BCCSAP of the coastal areas of Bangladesh show that the districts most affected by the impact of climate change are Khulna, Satkhira, Bagerhat, Patuakhali, Bhola, Noakhali, Barishal, Chittagong and Cox's Bazar. If the sea level rises one meter in these areas, most of these places will be inundated by saltwater, as a result of which the production of food grains will drastically decline and the crisis of drinking water will amplify. However BCCTF has allocated only the limited amounts of 6.5% of the fund and projects to Khulna, and 1.2% to Satkhira while no funds were allocated to the Aila affected district of Bagerhat. The selected NGO/private organizations working in Chittagong Division were allocated a total of 24.03% of the project funds while it is not clear how much has been allocated for the area with the highest risk – Cox's Bazar.

However areas that are not identified in the BCCSAP risk map as affected by the impact of climate change such as Dhaka, Tangail *sadar*, Gaibandha *sadar*, Rajshahi and Nababganj, have also been allocated projects, most of which are regarding tree-plantation. On the other hand, urban areas which have a lower risk but were nonetheless affected by flooding and droughts due to climate change, were also allocated some projects, for instance 4 projects in Tangail *sadar*, 2 projects in Gaibandha *sadar*, 1 in Nababganj *sadar* and 1 in Dhaka metropolitan city. There is a stark absence of consistency among the various aspects of programming such as the areas at risk due to climate change with BCCSAP's priority themes, with the sectors receiving funding and lastly the geographical areas where the approved projects are being implemented.

Among the 55 selected projects 5 NGOs were given a total of 12.7% of the allocation in the research<sup>9</sup> sector. However those NGOs that claimed “research” to be their main field of work either did not receive approval for a research project, or did not apply; instead they received funding allocation towards tree-plantation, sanitation or other sectors (Source: inspection of project implementation area in line with the project proposal, list provided by PKSF, field inspection, discussion with the key informants, 2013). Additionally, those institutions that have been working in Bangladesh and have earned a good reputation in the field of research, have been cited as examples – along with their field of engagement and theme – in the BCCSAP as the likely implementers of various projects in the NGO sector. But analyzing the list of the NGOs selected by PKSF it became evident that the organizations that actually received project approvals are incompatible with the descriptions of most of the organizations and the type of work described in the BCCSAP and selected organizations are inexperienced in the relevant work (Table 6). It is notable that the implementer NGOs are not entirely certain how the outcomes of the research projects would be applied, and for which types of adaptations they may be useful, and they were also not aware of whether BCCTB has any further work plans based on the outcomes, or any plans regarding their implementation. Since there are no guidelines in BCCTF regarding prioritization while funding public or private organizations, it is imperative that the impacted areas and their populations should be the main concerns among the overall considerations. However due to the failure in obtaining a majority of the project proposals and the absence of adequate information it has not been possible to learn much about the project implementation areas (district and sub-district level) of all the projects.

#### 7.1.5. Political and other undue influences in the selection of organizations and projects

According to article 1(A) of the guidelines from the climate change trust fund for selection of NGOs or private organizations and project implementation, NGO/private organization must be non-political. But investigation has revealed that the members in the Board of Directors and executives of some NGOs are actively involved in local political activities, and in some cases they even exert their political identities to influence government entities to act in favour of their organizations. Field inspections have revealed that, out of the 40 organizations a total of 13 had their members of their Board of Directors and executives directly involved in politics. In discussions with key informants various allegations of political influence have surfaced in relation to the approval of nine projects including exploitation of political power especially by the Ministers, MPs and affiliated government officials, and provision of other facilities like providing a set amount as commission

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<sup>9</sup> A review of the project proposals obtained by TIB show that the main activities of the projects under implementation are – collecting information regarding the current conditions of the neighbourhood and environment, collecting information regarding the impact of climate change, development of a survival strategy in the case of a natural disaster, adaptation methods, creation of a directory about survival methods in different natural disasters, research related to water, soil and water sample testing in impacted areas and analysis of that data and information, determination of the effects of the tropical storms Sidr and Aila on the soil and water of the impacted areas, testing of the blood and stool of the persons selected for assistance, and determining the common diseases prevalent after Aila and Sidr storms.

(20%) during the project’s budget estimation, at the time of policy definition illegally appointing NGOs that are affiliated to the family members of the staff as implementing partners, and setting up illegitimate computer centres in the electoral areas of the policy makers to win project proposals. The chief of one NGO stated that, “when they, like many others, also contacted the local MP to receive project approval, they were suggested to lobby at the higher levels of government officials.” The exercise of political and unethical influence was confirmed by several people affiliated with the selected organizations (Key informants, 2013).

**Table 5: Irregularities by the NGO/private organizations selected by BCCTF**

<b>Irregularities</b>	<b>Number of NGOs</b>
<b>The NGO could not be traced</b>	10
<b>Use of a current residence as a liaison office</b>	3
<b>Obtained the project by exercising political influence</b>	9
<b>Member of the main administrative or directors’ board of the institution involved in politics</b>	13
<b>Allegation of embezzlement by the selected organization for other projects<sup>10</sup></b>	2
<b>Registration had been cancelled by the microcredit regulatory authority</b>	1
<b>No presence of an office in the project area despite there being legal stipulations regarding it</b>	4

Source: Key informants, field level investigations, July 2013<sup>11</sup>

#### 7.1.6. Offices of the selected NGO/private organizations

During the inspections conducted based on the information provided by PKSf (Table 5), the offices of 10 NGO offices could not be traced. Out of these, the addresses provided for 4 NGOs were situated in completely residential areas, where the residents at the indicated addresses, who were in some cases NGO officials, refused to speak with the team. When the occupants of two of these apartments were approached for information, they declined, responding that the main executive was not available at the moment, while one reported that their address had shifted but failed to provide the new address of the office. On the other hand, while there were signboards at the indicated addresses of two other NGOs, different organizations were found to be operational there, and therefore contact could not be made with the relevant persons. During the site visits to the remaining four NGOs, the addresses provided by three could not be located at all, while for the last one, the indicated address was incomplete. Additionally, during field inspections based on the list of 55 NGOs provided by PKSf it was found that four organizations had changed their addresses. According to article no. 5(A) of the guidelines for selection of NGO/private organizations and project implementation issued by the climate change trust fund, all prospective NGOs/private organizations must have their own office and adequate human resources in the area for which they were applying, however it was discovered that 4 NGOs do not have offices in their project implementation areas. When queries were made regarding how the project was

<sup>10</sup> According to article 1(A) of the guidelines for the selection of NGOs or private organizations and project implementation, “NGO/private organizations must be voluntary, service oriented, non-political and non profit-making”.

<sup>11</sup> The information has been corroborated at different times with information published in newspaper reports

being implemented in the absence of an office in the project area, the team was informed either that associate NGOs had been selected, which is in complete violation of the policy, or the NGOs have plans to establish new offices in the project areas in future. It must be noted here due to the absence of offices and manpower in the project areas the selected NGOs have not yet initiated project implementation in those areas, although the implementation period is already half completed.

#### 7.1.7. Prior experience of the selected NGOs in climate change and related topics

Article 3(A) of the guidelines to assign NGO/private organization from BCCTF stipulates that, “Applicant NGO or private organization must have prior experience and adequate administrative capacity on climate change, natural disaster management, environmental conservation, pollution control, livelihoods and healthcare services related to climate change, or else the NGO/private organization will not be considered for funding”. This clause opens up the opportunity for every kind of NGO to work here. Research shows that among the 55 NGOs<sup>12</sup> that received the projects of BCCTF, only 17 have worked on environment and climate change, while only four 4 NGOs have climate change, environment and natural disaster management as their primary field of work (Table 6).

**Table 6: Priority areas of work of the selected NGOs**

Field of work of the selected NGOs or private organizations	Main field of work	2 <sup>nd</sup> main field of work	3 <sup>rd</sup> main field of work
Micro-credit	17	5	2
Social welfare, poverty reduction, handicrafts, social protection, working with disabled persons, capacity-building	13	12	6
Research	3	1	1
Education, healthcare, training, water, sanitary latrines, free distribution of medicines, sports	11	20	11
Awareness, advocacy	1	1	2
Natural disaster management, environment and climate change	4	7	6
Good governance, human rights, women empowerment	4	5	3
Forestry, agriculture	2	3	2

Source: Project proposals, key informant interviews, field inspections and the *2012 NGO Information Analysis* published on the websites of the NGO Affairs Bureau and Department of Social Services, June 2013

<sup>12</sup> Out of the 55 NGOs information about 40 NGOs were collected through field inspections, and that information was subsequently verified against the NGOs’ own websites, the district-based NGOs list (2012) published on the websites of the NGO Affairs Bureau and the Department of Social Services. Information regarding the remaining 15 NGOs were collected from the list of district-wise presence of NGOs (2012) published on the website of the Department of Social Services and from information published by partners NGOs who have worked with these organizations as supporting agencies.

#### 7.1.8. Institutional capacity of the selected NGO/private organizations

Most of the NGOs selected under BCCTF are registered with 2 to 3 or more institutions. The combined information provided by the NGOs, plus that published by the NGO Affairs Bureau, indicate that among the 55 selected organizations 34 are registered with the Department of Social Services and 21 are registered with the NGO Affairs Bureau. On the other hand, 11 NGOs are registered with the Department of Social Services as well as other government institutions such as the NGO Foundation, Micro-Credit Regulatory Authority and Joint Stock Company. Furthermore, some NGOs even registered as government trusts have also been approved projects under BCCTF.

**Table 7: Work experience of NGOs**

Experience of the NGO	Number of NGOs/organizations
30 years or less	7
20 years or less	25
5-10 years	23
Total NGOs	55

Source: Key informant interviews, field inspections and the *2012 NGO Information Analysis* published on the websites of the NGO Affairs Bureau and Department of Social Services, June 2013

Among those NGOs that have been approved to implement projects, seven have operated for 30 years or less, but those NGOs that are not mature with respect to their existence, especially those who have operated between 5-10 years only, number almost 23 (Table 7). The field inspections have exposed two NGOs that do not have adequate financial and administrative infrastructure in their main offices. The executives of these organizations attributed their financial hardships to the deficiency of funding. Although some NGOs appeared stable with respect to their workers and human resources, their specialization lies in other fields and they have no prior experience in working to address climate change related projects through climate finance.

#### 7.1.9. Participation of the affected communities in formulation of project proposals and in selection of project areas

Analysis of 21 project proposals has shown that the participation of the impacted population was not considered in the preparation of the project proposal or the selection of the project area. In reality, the project proposals were simply drafted by the prospective NGOs in response to the requirements of the project proposal made by BCCTF. As a result, rather than being aligned with the demands of the impacted communities, the projects were designed according to the NGOs' demands, and therefore did not always ensure the best outcomes for the impacted populations. On the other hand, most of the NGOs submitted projects worth Taka 45-50 million, and they had to propose work plans that were compatible with that budget. However, as the budgets were revised to the range of Taka 2-3 million without consultation with the officers of the selected organizations, the work plans became incompatible with the budgets. Consequently, NGOs were not interested to deliver the best quality output in the project, given the level of funding and the specified time provided.

**Box 4: Quality of the project proposal**

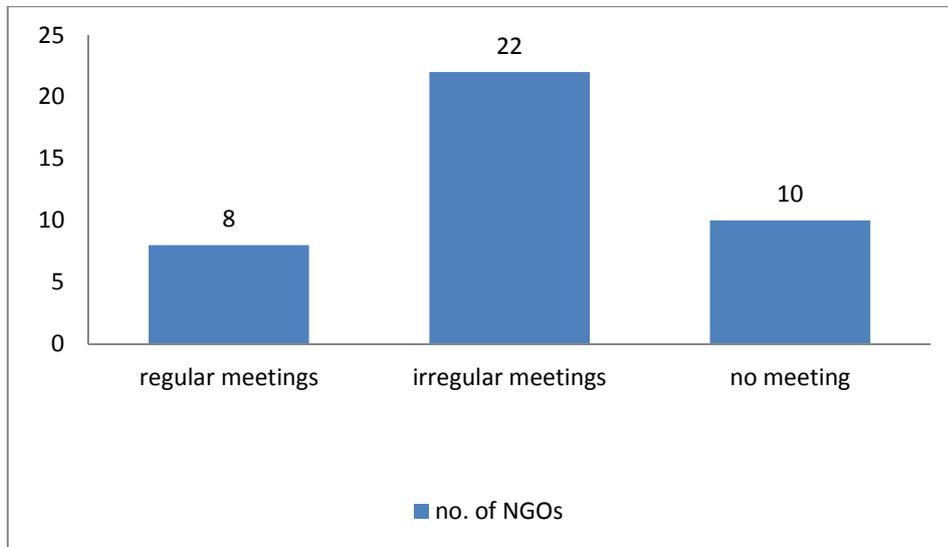
When the project proposals were requested from the selected 55 NGOs under the provisions of the Right to Information Act, only 21 NGOs conveyed their project proposals, while the other 34 NGOs did not respond. Within the scope of this research, the project proposals of the 21 NGOs were evaluated and it was found that seven project proposals were of substandard quality, and were limited to 2-3 pages only. None of the project proposals detailed the division of the work plan or the work process of the projects. Therefore, it is difficult to determine the true extent of the work and its outcome. The project proposals only reflect the allocation funds against the various activities, but no work plan or information has been provided regarding the efficacy of the project in preventing climate change, beneficiaries of the projects and their selection process, project implementation methodology, outcome of the projects and method of evaluation of the project outcome, method of guaranteeing the delivery of various items provided through the project and ensuring their sustainability (e.g. – sanitary latrines, rooms, planted trees, solar-powered stoves, eco-stoves, biogas plants, etc.). On the other hand, majority of the project proposals were amended before their approval where the NGOs were instructed to append or exclude some topics for amendments, without any participation or feedback from the prospective NGOs. (Source: TIB research and key informants 2013)

**7.1.10. Accountability of the organizations selected**

Every NGO has an executive committee; but although regular meetings are mandated to facilitate decision-making, this rule is not followed. According to the information obtained from 40 NGOs, the informants acknowledged that 10 NGOs do not hold executive committee meetings. In addition to that, most of the NGOs do not record the meeting minutes.

Members of the executive committees of some NGOs informed that they only participate in the annual general meetings or any other project-related meetings, and generally do not play any policy-making role within the NGO. Although the NGOs do not publish their financial reports to the public they submit those reports to the government's regulatory institutions when required. However a large number of the selected NGOs submit their financial reports to the local government sub-district or district office, albeit reluctantly (Source: Key informant interviews, 2013).

**Figure 6: Meetings held by the executive committees of the selected NGOs**



Source: Field inspection of the organizations, 2013

#### 7.1.11. Practice of institutional integrity

According to article 4(A) of the BCCTF guidelines for the selection of NGOs or private organization and project implementation, NGOs are required to submit their organizations' annual audit reports to certify their transparency in financial management, however although these documents primarily appears to

have been submitted, there was information to indicate financial mismanagement in two of the NGOs. Notable incidents of financial mismanagement include embezzlement of funds from relief projects, creation of forged records, invention of fake executive committees made up of one's relatives, misappropriating project funds without doing any project work, embezzling money and other project benefits posing as project

#### **Box 5: Practice of institutional integrity**

Among the organizations that obtained projects from the climate change fund, an organization from Pabna received the responsibility of distributing sewing machines from a project of the Department of Women Affairs (DWA). DWA solicited the names of some local beneficiaries from the organization, to which, the organization submitted a list of the names of some of their handicapped beneficiaries but after DWA handed over the sewing machines, the organization sold the machines instead of distributing them. According to the local informants, the same organization also worked on a foreign NGO-funded project related to good-governance in land management. On that project, the organization paid around 7-8 of their workers only half of their monthly salary, while the organization's executive withdrew the rest of the salary by check. Later when the community and the local administration learnt about it, the funding agency closed and cancelled the project. But still, such organizations have received BCCTF funding (Interview of the key informant and field inspection, 2013)

beneficiaries. A selected NGO from Tangail misappropriated Taka 1.9 million from a UNDP project in 2007, following which, the matter was published in the local newspapers and following the instructions of the district-level officer of the district office of the Department of Social Service, the organization's certificates and registration were cancelled. At that time, even the members of the NGO's executive committee submitted a written complaint against the NGO to the district Executive Officer, for the charges of producing false records<sup>13</sup>. A local representative of the NGO and the residents of the area informed that, there are various allegations of corruption against everyone in that NGO including the accountant.

On the other hand, wives or relatives of political persons are positioned as chief executives and members of administrative committees in some of the NGOs. Moreover research has shown that members of different political parties are affiliated with many of the NGOs and there are allegations of various irregularities against them including taking loans from the Department of Social Services in their relatives' names and then defaulting, cancellation of registration due to failure to transparently conduct the loan-programmes of the micro-credit authority.

## **7.2. Monitoring the governance of projects implemented by the selected private organizations (comprehensive)**

### **7.2.1. Political influence**

Out of the total allocated funds, 38.48 % has been provided through projects approved in the food security and social protection sectors. A total of Taka 34 million has been approved for 13 projects. The use of political influence or power to elect the beneficiaries who are otherwise supposed to receive free facilities from the projects is viewed as a challenge by those affiliated with the projects.

### **7.2.2. Unwarranted interference in the selection of NGOs and private organizations**

There are allegations of illegitimate interference in PKSF's decisions even at the policy level. One executive of an NGO recipient of the climate fund remarked that, "It has been confirmed from reliable sources that BCCT handed a list of 131 organizations to PKSF, after evaluating which, PKSF recommended selecting 48 who met the minimum criteria. Although according to PKSF's evaluation the other seven organizations were unfit to receive project funding, they were nonetheless selected for project implementation. Why these organizations were selected and on what basis, are questions still unclear even to PKSF." That these organizations do not have the capacity to receive project allocation was expressed by quite a few NGO representatives. On the other hand, PKSF did not have the authority to select the eight more organizations that BCCTF later selected. On this matter PKSF has stated that, "The board of trustees subsequently assigned PKSF to release funds among the 63 NGOs including those eight that were selected later. (PKSF provided press note, 2013)

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<sup>13</sup> TIB officials have that written complaint in their possession

**Box 6: Complexities related to fund expenditure**

The NGOs are facing problems with their progress report and project fund expenditure because NGOs have to follow PKSf's own procedure of project implementation. It is stated in clause no 1.7 of the NGO agreement, that project funds may only be spent through accounts payable checks. But in those sectors where cash may be used, a maximum amount of Taka 3,000 can be spent daily. It may be noted that, the monthly cash expenditure cannot exceed Taka 80,000. The NGOs have complained that due to this condition given by PKSf they cannot spend according to their own requirements and the projects' needs. One executive informed the team that although the project period was nearly over, the seedlings produced from their own seedbed were not yet ready to be planted. Therefore to complete the project in line with the rules and on time, they would have to buy mature seedlings from another seedbed and then plant those. To buy the seedlings the NGO would have to spend 50% of the project-funds within the next two months which is not possible because of the abovementioned condition. However, no measures are forthcoming from PKSf to resolve this issue. (Source: Key informant, 2013)

**7.2.3. Ambiguity in the financing policy**

In the case of most of the NGO projects, funds distribution began from November 2012 and continued until January, with the maximum project duration of 1 year. There is a rule mandating the disbursement of project funds in three separate instalments. According to the information provided by PKSf and the NGOs, most of the NGOs are using their second instalment of the project fund. At the field level interviews, most organizations confirmed that 50-60% of the entire work had been completed. Then again, a few organizations asserted said that since the funds that they were allocated had not been released quickly and since they had 'less work' to do, they had financed the climate fund projects with moneys from other projects in an effort to finish the project activities speedily. It is noteworthy that, article 10 (D) of the guidelines on NGO/private organization selection and project implementation states that NGOs and private organizations should follow a specific framework for financial reporting, but it is not clarified which organization's (PKSf or BCCT) financial management rules and regulations would apply in their case. It is to be mentioned that, according to clause 1.7 of the contract between PKSf and the NGOs, PKSf is the entity that releases the project funds and the NGOs are not able to spend more than a specified amount daily and monthly for the project. Consequently, various problems have arisen regarding expenditure related to necessary project procurement and other payments (Box 6).

**7.2.4. Inadequate supervision and evaluation**

The following challenges have been identified with regard to the monitoring and evaluation of project implementation, during field observations:

- During the implementation of the climate fund projects, no PKSf or government official has visited the field for purposes of supervision, monitoring or evaluation (field level interview,

June 2013). Therefore it has not been possible to certify the transparency and integrity of where and how the NGOs are operating (Box 7).

- PKSF is not receiving any remuneration for fund management therefore it is unclear how a non-profit organization like PKSF is expected to bear the costs of the field level monitoring and evaluation;
- NGOs generally present their application for each new fund instalment in conjunction with the submissions of the accounts of expenditure and the progress report. On the other hand, it is mentioned in the project implementation contract that the project progress report must be sent to PKSF on a monthly basis, but PKSF is yet to provide any framework for submitting the reports and project fund expenditure to the selected NGOs;

**Box 7: Climate change affected populations trapped in a cycle of debt**

The solar energy, carbon-saving stoves, biogas, tube-well and various materials allotted for distribution will be used and maintained by individuals or by community population of the project area. Most of the project proposals do not contain any plan and direction to determine the procedure of selecting the beneficiaries, type of beneficiaries, sustainability of the provided benefits and their usefulness. Taking this opportunity an NGO is distributing solar energy; eco-stoves and other facilities of the project to its beneficiaries who are also its micro-credit recipients instead of distributing them among the affected and threatened population for free. It provides these goods to its beneficiaries with 50% of the price and the other 50% for free. Therefore there is a high chance that the real climate change affected population will not get the benefits from the projects. (Primary informer's interview and field inspection, 2013)

- A good number of NGO representatives informed us that as there were no guidelines provided with respect to the submission of progress reports, the NGOs each submit their reports in their own format. As a result, it is impossible to get a uniform picture or idea of the true progress of the projects, from the information amalgamated at the fund management level. BCCT or PKSF is also not publishing any report on this matter.

### **7.3. Monitoring governance in the implementation of projects by selected NGOs/private organizations**

#### **7.3.1. Afforestation projects**

Among the 55 NGOs/private projects selected by BCCTF 20 were involved with seedling production, tree-plantation and afforestation. 21.17% of the total project fund has been allotted to the mitigation and carbon-saving development sector where most of the projects are related to tree-plantation. The plan is to build up nurseries of horticultural, medicinal and wooden trees and distribute the seedlings among the targeted households or plant them by the roadside. The projects are currently being implemented in Chapainawabganj, Rajshahi, Bandarban, Tangail, Dinajpur and Pirojpur districts. The beneficiaries of the organizations will work in tree plantation and according to the project proposals, will be trained to generate awareness on this matter.

**Box 8: Effectiveness of the fund allotment regarding forestry**

21.17% of the total fund has been allotted to the projects related to forestry among the 63 projects selected by BCCTF. From the field inspections it was known that, in some of the forestry projects the number of the produced seedlings were mentioned, but not the total planting area. From seedling production to plantation, for the same kind of project, some projects' allotment is Taka 10 per seedling whereas some other projects' allotment is Taka 64. Besides, 2 projects have allotted money for guarding the trees while others with the same kind of projects have not. Moreover, instead of planting forest, horticultural and medicinal trees significant amount of incursive trees (Ipil-ipil, Eucalyptus, Acacia) have been planted because of their low production cost although they affect the environment.

To justify the forestry projects in the North of Bangladesh the NGO representatives said that, their work areas are disaster-prone due to heavy rainfall and drought, the projects are adopted to prevent disaster. But according to the local population it will not be possible for the projects to have effective impacts on the prevention of the local climate change and also the projects will not have long-term impacts because:

- **Lack of capability and accountability:** Among the forestry projects one NGO does not have an office in the proposed project area and although the duration of the project is more than 12 months they are trying to show that the project is complete when actually they had some work done only partially in their proposed work area (Field inspection, June 2013);
- **Uncertainty in tree-plantation and outcome of the projects:** The NGOs have been allotted a general budget under the projects for tree-plantation, but the amount has not been specified for the number of trees, seedling production and future maintenance. As a result, most of the times the NGOs prefer the invasive trees (Ipil-ipil, Eucalyptus, Acacia) to minimize their cost. On the other hand, proper nursing is mandatory for roadside plantation but there is no allotment regarding this. Four of the projects mentioned the locals' responsibility for maintenance but the locals said that, "roadside plantation does not generate a feeling of ownership among the locals. Therefore nobody takes care of the trees and most of the trees die."
- **Inappropriate duration for project implementation:** The officers of 3 organizations told about tree-plantation projects that, a great hurdle in their work is inadequate project fund. After their projects were approved in 2012, they were not given the required time and fund to make seedbed and let the seedlings be ready for plantation. So, there is doubt whether the NGOs will be able to plant the trees within the project duration. As the time for tree-plantation has expired, there is no chance to plant seedlings after the rainy season.

### 7.3.2. "Cyclone-resistant house construction and capacity building projects"

A national level NGO got the project for cyclone-resistant house building and capacity building from the climate change trust fund. The organization got their registrations from the NGO Bureau and Joint Stock Company from 1997 and operates in 5 districts including Dhaka, Manikganj,

Munshiganj, Chittagong, Cox's Bazaar and Barisal, but they do not have their own office in Chittagong. At present they have 65 permanent employees and 8 branches. The NGO works in the health projects funded by different ministries of the government, BRAC (education program) and NGO Foundation. The NGO does not have any direct experience in climate change and never worked with PKSF before. But they have distributed relief materials and built and repaired houses, cyclone shelters, mosques and temples after the cyclone and flood of 1991, 1998 and 2004.

- **Project acceptance and approval:** Primarily Taka 51.9 million worth of project proposals were submitted to BCCT but the 2009 layout of the Directorate of Relief and Rehabilitation was told to be followed and a budget was provided in accordance with that. Finally Taka 10 million was allocated against the Taka 50 million worth of project proposals and it was decided to keep the project area limited to Chittagong. Later BCCT decided to expand the project area to Aila and Sidr affected Khulna and Bagerhat. In that context, an increased budget of Taka 24.2 million was approved to build 200 houses allocating Taka 136,373 per house and considering other expenses. As the prices of the construction materials increased later, PKSF instructed the organization to build 160 houses instead with the same budget.
- **Questionable approval:** It was not clarified why the same Technical Evaluation Committee of BCCTF approved two different types of climate-friendly houses (Box 8) without any satisfactory explanation. Besides, which one of the two is actually a climate-friendly house is debatable.
- **Non-transparency:** There was no definite information in the project proposal about the determining factors that have been considered while selecting the project implementation area, beneficiaries and design of the house.
- **Not having an office at the project sites:** The organization does not have their own office in 3 of the 4 project areas including Chittagong which is in violation of the policy. In Chittagong (Ranguniya and Boalkhali) the project is run from the office of an associate NGO named 'S' but there is no mention of any permission regarding that or the name of the associate organization in the project proposal. But on the other hand, it was learnt that, in Khulna and Bagerhat the organization will work in association with other organizations. Two representatives of the associate organizations have been appointed in the Project implementation committee. But it is stated in the clause (B) of paragraph 7 of the NGO/private organization selection and project implementation policy that, an NGO/private organization will be approved for only one independently submitted and acceptable project, and for collectively submitted projects appointment of the associate organizations has to be mentioned in the project proposal which has not been maintained in case of the above-mentioned project.

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**Box 9: Approval of two different types of climate-resistant houses funded by the same BCCTF!**

***Climate-resistant housing approved under the BCCTF fund for NGOs***

**Number of houses – 160**

**Cost:** Taka 111,373 per house, Taka 15,000 per toilet, Taka 10,000 per tube-well

***Climate-resistant housing built by the Ministry of Disaster Management and Relief***

**Cost:** Allocation of Taka 120,000 per house



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Source: Key informant interviews and field inspection 2013

- **Political influence on project implementation and accountability:** Under the house building project an idea of building 160 houses (based on the 2009 layout by the Directorate of Relief and Rehabilitation) and establishing 10 community-based tube-wells was provided. Based on community 10 families (who will be facilitated with a house) will be able to use a tube-well. Every house will have 8 RCC pillars and each family/package has been allocated a total of Taka 136,373 including Taka 111,373 for house, Taka 15,000 for toilet and Taka 10,000 for tube-well. The project implementation committee includes three officers from the implementing organization and two from the associate organization appointed in Chittagong who has instructed to select the beneficiaries based on some specific determinants.
  - It has been found by talking to two different NGO representatives and officials from NGOs which got projects that projects got greater funding due to being appointed via political influences. (Source: Key informant and field inspection, 2012 and 2013)

- Since there was no regulation to appoint new employees and for employing only one diploma engineer- the institution is not working consistently in all project areas. When a construction work begins in one place the engineer is present in that site, and this delays project work.
- By inspecting the implementation areas, according to the work plan given in the project proposals-project homes were built and beneficiaries were selected. Yet it was a big challenge to maintain communications and transport as the homes of the ultra poor are scattered far away. The increased price of construction materials can hamper the work process.
- In the implementation stage the project was to run in Cox’s Bazar, Chittagong, Khulna and Bagerhat at the same time but it was seen to be completed only in Ramu in Cox’s Bazar and Chakaria. At Rangunia/ Chittagong the work remains in early stage. Since there are no offices of NGOs of Khulna and Bagerhat districts-work has not begun yet.
- **Project inspection and examination by the fund providing organization:** Although the project implementation committee scrutinizes the project work regularly, any officer from PKSf has not yet inspected the project work. But the organization has submitted the progress report to PKSf office and if the projects can be correctly evaluated and implemented then the appropriate use of the project fund can be ensured.

7.3.3. “Drinking Water Supply and Sanitation for Climate Change Vulnerable Areas in Chittagong, particularly Anwara and Banskhalı Upazila” Project

The project implementing NGO was established in 2000, and received its registration from the Department of Social Services and Micro-credit Regulatory Authority (MRA). The organization operates through 74 employees and 10 branches. It has 10 offices in Chittagong district. Currently the organization is implementing three projects which are, the Prime Minister’s housing fund, NGO Foundation’s sanitation fund and BRAC education programs. It also runs credit programs. The project implemented by the Climate Fund is a new addition. But the organization conducts awareness programs about rights with their own fund. The organization has mentioned about having experience in working on water and sanitation programs. PKSf came on an inspection to verify the organization’s competency but it never worked with PKSf before. Under this project a total of 490 environment-friendly toilets will be built and the estimated cost per toilet is Taka 4,220.

- **Project formulation and approval:**
  - **Justification in approving the project:** Primarily the NGO submitted a project proposal worth Taka 5 crores to the Ministry of Environment for the project, which included a proposal for rain-water harvesting, but it was not comprised in the main project proposal that was approved, without showing any reason for that;

- **Not taking into account the opinions of the local population:** An officer related to the project claimed that, satellite images were reviewed to determine the risky areas due to climate change with the help of an expert to make the project proposal, but the opinions of the locals about their demands were not captured during project planning (Interview of the local population, 2013).

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**Box 10: Allocation for two types of toilets to two NGOs in the same region**

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**Toilet construction project**

**Allocation for toilets: Taka 4,200**

**Project area: Chittagong**

**Within the purview of the house building project**

**Allocation for toilets: Taka 15,000**

**Project area: Cox's Bazar, Patia**




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Source: Field visit, 2013

- **Project Implementation:** To select the beneficiaries of the project at first the help of the Union Parishad was received; later a project supervisor collected information from the project implementation site. After selection those who were capable were encouraged to build a toilet by their own and those who were not were provided an environment-friendly toilet for free.
  - **Inadequate allocation:** According to the calculation of the NGO Foundation the cost of building a toilet with general standard is Taka 5,460. Within the purview of the implemented project the determined price is Taka 4,220 per toilet which is not enough to build a good and durable toilet. Besides, due to low allowance the quality of the toilets could not be ensured and they have the possibility to be unusable within a short period of time.
  - **Lack of awareness about usage:** Even if the toilets reach the target population the usage of the toilets cannot be ensured; because necessary steps were not taken to increase effective awareness among the local population to change their habit before approving the project. As a result, members of many families who obtained toilets have been seen defecating on roads and open spaces. Note that, although it was required, no allotment was suggested for awareness building in the project proposal saying it will be dissipation.

- **Flawed project plan:** If the whole area does not come under sanitation then the benefit from the project will be wasted, if during a disaster a few areas get inundated by flood or excessive rain and the whole area gets polluted because of those few families who did not get toilets. Considering that, all the areas within the range of the project should be included into the scope of the activity, but as there is not enough allowance for that the implemented project will not be able to deliver the expected result.
- **Local extortion:** The NGO has received two instalments of the 2.5 million for project expenditure and at present 60% of the total project work has been completed. There was no problem after the first instalment. But a week after the second instalment was deposited to the organization's bank account; 2-3 local persons using their political identity demanded a particular commission (%) of the discharged money as levy and pressurized to give it.
- **Project inspection and scrutiny:** PKSF has not yet inspected the progress or the quality of project implementation and the NGOs have submitted the progress reports using their own format to PKSF. It is not clear whether PKSF provided any format on reporting (both works and financial) for the implemented project.

#### 7.3.4. "Obolombon" project

The "Obolombon" project allocated to distribute environment-friendly stoves is being implemented by an organization that operates in Chittagong. Established in 1997 the NGO got registered from the Department of Social Welfare, Micro-credit Regulatory Authority, NGO Affairs Bureau and Department of Youth Development and is operating with 150 employees and 7 offices. After its establishment the organization has worked on the rehabilitation of the street children, rights of the physically challenged individuals and others and it is skilled in this field. Moreover, they are also involved with "Provati" project funded by the Save the Children, enhancing living standard by credit projects, training projects and sub-formal education programs in 22 schools for BRAC Education Program. But the organization does not have any experience in implementing climate change projects.

In villages women cook on open stoves, the smoke emitted from those stoves causes health risks for the family members. On the other hand, these stoves require more fuel which is not environment-friendly. Considering all these they have undertaken the project of distributing stoves.

- **Planning and approval:**
  - **Not taking into account the opinion of the local population:** No discussion took place with the local population and the beneficiaries of the projects while taking the project.
  - **Funding the less preferred sector in climate change:** Although the organization was given the stove distribution project, the clause (A) of paragraph 7 of the policy states that an NGO/private organization should be encouraged to apply for the climate change related field where they have the maximum experience and efficiency.
- **Project implementation:**

- **Delayed project work:** Although the project is supposed to be completed within a year, which means by November 2013, only 40% of the work has been done, and as the project started 2 months later than the specified time, the expected outcome may not be received. Note that, before the beginning of the project implementation District Administration, Sub-district Executive Officer and UP members was informed by letters and their participation in project implementation was ensured. It should be mentioned that, the project budget of Taka 10 lacs was prepared a few years ago based on the then costs and the organization did not have the chance to participate in the making of the revised budget; eventually when the project started the price of the stove rose up which is causing difficulties for the implementing organization to complete the task. Officers of the organization claimed that since there is a contract with the contractor/leaseholder, he is bound to supply stoves at the pre-determined price.

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Box 11: Project related general information

<p><b><i>Environment friendly stove distribution under BCCTF project</i></b>  <i>Implementation area: Pekua</i>  <i>Total project allowance: Taka 1 million</i>  <i>Total number of stoves: 650</i>  <i>Average price per unit: Taka 1000 (information provided by the Organization)</i></p>	<p><b><i>Stove distribution by Grameen Shakti</i></b>  <i>Implementation area: Chakaria</i>  <i>Selling price of the stove: One-way Taka 700; and Two-ways Taka 800 (collected at field level)</i></p>
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Source: Field inspection, June 2013

- **Challenges in selecting the beneficiaries:** To select genuine beneficiaries is difficult as the organization has credit programs. Nonetheless an officer of the organization has claimed that, a primary survey was held and based on the information from that survey, the beneficiaries were selected. Although they said that they will discuss with the Union based female UP members and the influential persons of the society to select the final beneficiaries, in reality they did not do it properly (Interview with the local beneficiaries, June 2013). But, according to the NGO representatives, there was no problem selecting

the beneficiaries because, there are 10 schools in that area conducted by the organization and they are working for more than two years in those areas.

- **Risks in the proper use of the fund:** In the project proposal the average cost per stove was shown Taka 1,000 but practically the average buying price was Taka 750-800. So, the difference between the distribution price and the real price of each stove is Taka 200-250, which saves about Taka 135,000 (Taka 200-250 \* 650) of the project fund. It was observed in the field inspection that, no monitoring or inspection of the project implementing work has been done yet from PKSf. From inspection it was revealed that, the organization has stated the price of the stove Taka 1,000 when it can be bought at Taka 700-800. Besides, the organization is collecting the stoves from a manufacturer in Chittagong claiming that the locally produced stoves are expensive. But it was observed in the field inspection that both the price of the locally produced stoves and the transportation cost are low. Moreover, there is a separate allowance for the transportation cost in the project proposal, but still it is being collected from the beneficiaries.
- **Usefulness of the distributed stoves:** After distribution if required, the NGO-appointed worker can provide services but once the project ends this service will no longer be available. Note that, there are 50 social awareness committees in the project implementation area that include the beneficiaries, through which the beneficiaries are trained about the project and the environment friendly stove's usage and its utility. But even after the training many people cannot fix the stoves, so there is a chance that they will be unusable pretty soon.
- **Receiving complaints and solving problems:** SMC's regular parents meetings are held for the NGO conducted schools; as a result, everyone's complaints, problems and suggestions can be heard and problems can be solved very easily, claimed a project implementation related officer.
- **Project inspection and examination by the fund providing organization:**
  - **The implemented project not being visited by PKSf:** PKSf inspected the NGO while selecting the organization but did not inspect its programs when the project was being implemented. Therefore, according to the NGO/private organization selection and project implementation guidelines, clause (B) of paragraph 11 and clause (A) of paragraph 15, it was not verified if there were any kind of irregularity and dissipation. Note that, the NGO has never worked with PKSf before. So, they were introduced to PKSf through this project. PKSf does not have much idea about this organization;
  - **Absence of specific monitoring guidelines:** As PKSf does not have any reporting format the NGOs submit all reports in their own format. In general, PKSf has little freedom in selecting the NGOs. According to the executives of the project-recipient organizations, PKSf does not have any power of its own, so the organization is basically acting as a "post box" for the Ministry of Environment and Forest. Besides, while approving the project, instead of considering the real risk of climate change the NGO-provided project proposal

is considered; so the affected local population's opinion and participation has not been reflected. Observing the summaries of the project proposals of the project-obtaining organizations, it has been seen that, most of the NGOs have worked on social afforestation and water and sanitation projects. On the other hand, area-based analyses showed that, in the North of Bangladesh most of the projects are water and sanitation and social afforestation related, who's their direct relation with climate change is yet to be determined. There are allegations that 2-3 organizations have been allocated more than others without any logical reason, which undermines the competence of the relatively better organizations and reduces the opportunity for other organizations to enhance their ability. According to the experts there is the possibility of political exploitation in the biogas plant and solar power providing projects. Therefore there exist several challenges for the climate change fund to reach the truly affected populations. It was not clear from the project proposals or from the field inspections how these projects would help to address climate change, or what were the risks that the project beneficiaries were facing due to climate change. At the same time another challenge from the perspective of transparency is in ensuring that the facilities that are to be provided for free were not being made conditional upon obtaining loans from implementer NGOs.

## **8. Comprehensive overview**

The overall challenge that has been identified in delivering funds is that the countries liable for the climate change have dispensed a lower amount than they had promised to Bangladesh. Formulation of climate projects by government institutions have presented challenges which include not enough involvement of the affected community in the implementation of the projects, lack of interagency coordination, not studying the environmental and social impacts of the projects prior to their formulation, and not identifying the long-term effects of the project. Implementation of climate projects by government institutions have presented additional challenges including not differentiating between the projects implemented by loans or financial compensation, exercise of political influence in contractor selection, use of low-quality construction materials in the building works and non-involvement of the local affected community in project implementation, supervision and monitoring.

There are also some overall risks in project proposal approval and implementation for NGOs. Challenges in NGO selection, project formulation and approval that have been identified include, lack of autonomy of PKSF to operate and in specific cases the exercise of political and other undue interference, not considering the actual risks of climate change and furthermore the existence of political considerations and other conflicts of interest in the selection of projects, locations and beneficiaries and in project approval, not selecting the correct and trustworthy NGOs and sometimes financing inefficient organizations, and an overall lack of transparency in project approval. Furthermore the risks observed in implementation of projects by NGOs are the absence of specific and measurable outcomes of project implementation and lack of transparency, lack of measure to resist corruption and to ensure proper accountability, lack of long-term and comprehensive work plans, absence of procedures to address

complaints at various stages of project implementation, absence of a framework for accurate monitoring, inspection and evaluation, etc.

## **9. Recommendations**

### **9.1. Government projects with climate fund**

- Organizations that implement the projects related to river protection and waste removal from rivers must involve relevant organizations such as Dhaka WASA, Water Development Board, City Corporation, etc;
- Prior to project development, the sustainability of the project and the opinions of the affected communities must be brought into consideration;
- Utmost openness of information and accountability must be ensured in every stage of project selection, approval and implementation;
- There must be a system to readily accept complaints and expeditiously resolve them at every level of climate fund management structure;
- Greater representation of the civil society should be facilitated in the meetings of the BCCTF board.

### **9.2. Selection of NGO/private organizations, and project implementation**

- PKSF should have the complete freedom to select the organizations;
- There should be a watchdog body along with the project selection and approvals committee to observe the implementation of the projects;
- NGOs should be selected based on competence and capability, and required funds and adequate time should be given to implement the projects;
- To ensure integrity, transparency and accountability in using the climate finance there should be effective protective measures and actions should be taken against the corrupt individuals/organizations.

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