Maldives: Tsunami Emergency Assistance Project
ABBREVIATIONS

ADB – Asian Development Bank
CBO – community-based organization
DEAP – Disaster and Emergency Assistance Policy
EIRR – economic internal rate of return
GDP – gross domestic product
IDC – island development center
M&E – monitoring and evaluation
MFAMR – Ministry of Fisheries, Agriculture, and Marine Resources
O&M – operation and maintenance
PCR – project completion report
PMU – project management unit
RRP – report and recommendation of the President
TA – technical assistance
WSS – water supply, sanitation, and solid waste management

NOTE

In this report, “$” refers to US dollars.

Key Words

adb, asian development bank, atolls, emergency assistance, evaluation, Maldives, project completion report, tsunami, validation

The guidelines formally adopted by the Independent Evaluation Department (IED) on avoiding conflict of interest in its independent evaluations were observed in the preparation of this report. To the knowledge of IED management, there were no conflicts of interest of the persons preparing, reviewing, or approving this report.

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I. PROJECT DESCRIPTION

A. Rationale

1. The 2004 Indian Ocean earthquake and tsunami had a devastating impact on the Maldives. Unlike other countries affected by the tsunami, the Maldives experienced a disaster of national proportions, with 39 islands significantly damaged and nearly a third of the population severely affected. Thousands had their livelihoods undermined. Total damage was estimated at about $470 million, close to 62% of the gross domestic product (GDP). The tourism sector suffered the largest direct damages, followed by the housing sector. The combined impact of the tsunami was expected to significantly reduce GDP growth in 2005 from the pre-tsunami estimate of 7.5% to 1%. The impact on public finances was likely to be substantial, with budget deficit expected to rise to 10% of GDP. While significant external financing was required, the Government of the Maldives needed to avoid increasing external debt to uncomfortable levels, which could have a negative impact on future growth. Hence, grant was identified as the preferred mode of external assistance for financing post-tsunami rehabilitation and reconstruction).1

B. Expected Impact

2. The expected impact of the Tsunami Emergency Assistance Project (the project) was to contribute to the sustainability of economic growth by minimizing the devastating impact of the tsunami, measured in terms of economic recovery and increase in economic activity in affected islands.²

C. Objectives or Expected Outcomes

3. The main objective of the project was to restore economic activities and livelihoods on tsunami-affected islands, measured in terms of (i) rehabilitated public infrastructure and adoption of appropriate design standards in water supply, sanitation, and solid waste management; power; and transport sectors; and (ii) improved incomes and self-reliance.³

D. Components and Outputs

4. The project had two components: (i) a quick-disbursing component; and (ii) a project component.

(i) Quick-Disbursing Component. The government requested that a portion of the Tsunami Emergency Assistance Project be used for quick-disbursing assistance⁴ to partially finance the unusually high and unexpected government expenditures on tsunami-related rehabilitation and reconstruction. A total of $6.5 million was allocated, as proposed, and was to come from the grant ($4.7 million) and from Special Funds resources ($1.8 million). In accordance with the Disaster and Emergency Assistance Policy (DEAP)⁵ of the Asian Development Bank (ADB), the quick-disbursing component of the proposed project would be used to finance only imports identified as necessary for an effective recovery program. The government and ADB agreed on a list of permissible imports for financing under the quick-disbursing scheme. Under this scheme, ADB also approved retroactive financing (of up to 30% of the project) for eligible expenditures incurred from 1 January 2005.

(ii) Project Component. The project component was estimated at $15.3 million for grant financing. It covered the rehabilitation of high-priority, tsunami-damaged infrastructure and facilities by providing civil works, equipment, materials, working capital, and consulting services for project design, implementation, monitoring and evaluation (M&E). In consultation with the government, and taking into account the assistance proposed by other development partners, the project component was to finance rehabilitation and reconstruction in the following sectors: (a) water supply, sanitation, and solid waste management (WSS); (b) transport; (c) power; (d) fisheries; and (e) agriculture.

(a) Water supply, sanitation, and solid waste management. For this sector, rehabilitation and provision of WSS infrastructure and services for the 69 most affected communities were proposed to be undertaken. In the short term, critical equipment was to be procured for (i) immediate provision of safe water to affected areas; (ii) provision of basic temporary sanitation facilities and rehabilitation of existing sanitation infrastructure; (iii) provision of solid

² Footnote 1, Design and Monitoring Framework.
³ Footnote 1, p. 25.
⁴ The World Bank also provided quick-disbursing assistance for rehabilitation and reconstruction.
waste management equipment (including communal bins, composters, compactors, and cutters); and (iv) training for clearing and recovery of debris. In the medium term, (i) environmental infrastructure (including sewage systems, networks, and outfalls) would be rehabilitated and reconstructed; and (ii) water and sewage treatment and disposal facilities for displaced population, and solid waste management systems and facilities were to be provided.

(b) **Transport.** For this sector, proposed interventions comprised the (i) rehabilitation and/or reinstatement of maritime navigation aids that had been damaged or destroyed; (ii) procurement of emergency inter-island transport capacity for reconstruction works; (iii) rehabilitation of damaged jetties; (iv) repairs to sea walls and quay walls; (v) repairs to causeways; (vi) dredging of harbor basins and approach channels; and (vii) rehabilitation of the Male International Airport.

(c) **Power.** ADB support for this sector included rehabilitation of damaged power supply system. This consisted of supply and installation of new generators and distribution networks, including cables and distribution boxes. If necessary, streetlights were to be installed. In bigger islands, with more than one generator, panel boards were to be provided to synchronize operations. In islands where the powerhouse was badly damaged, new powerhouses would be constructed. Restoring connections to households were to include installation of new meters and consumer panels.

(d) **Fisheries.** The following interventions were proposed: (i) support for fish processors by providing them with processing equipment, working capital, and extension services; and (ii) strengthening the Ministry of Fisheries, Agriculture, and Marine Resources (MFAMR). The MFAMR, in conjunction with affected fish processors, was to select in a participatory manner community-based organizations (CBOs) or island development centers (IDCs), which would be responsible for delivering project inputs and working capital to the affected fish processors. The project aimed to provide CBOs and IDCs with training so they can provide efficient services to fish processors.

(e) **Agriculture.** The project proposed to support affected farmers in the perennial and field crop sectors by providing them with farm inputs, tools and equipment, and working capital to rehabilitate their farms and restore their livelihoods. The MFAMR was to select CBOs and IDCs to deliver project inputs and working capital to affected farmers. Mobile extension service teams were to provide extension services to farmers. Consultants were to be mobilized to strengthen the institutional capacity of the MFAMR, CBOs, and IDCs.

**E. Provision of Inputs**

5. The total cost of the project was estimated at $25.3 million equivalent, with a quick-disbursing component of $6.5 million. ADB was to finance a total of $21.8 million—a grant of $20.0 million from the Asian Tsunami Fund, and a loan of $1.8 million from the Asian Development Fund. The grant and loan proceeds as the project components were to be made available to the implementing agencies through budgetary allocations. The government was
expected to contribute 19% of the estimated cost of reconstruction and rehabilitation, mainly in the form of tax exemption and administrative support.

F. Implementation Arrangements

6. The Ministry of Finance and Treasury was to act as the executing agency, with the following technical ministries and agencies as implementing agencies: (i) Ministry of Health and Ministry of Environment and Construction in WSS; (ii) Ministry of Atolls Development, and Ministry of Transport and Civil Aviation in the transport sector; (iii) MFAMR in the agriculture and fisheries sectors; and (iv) State Electricity Company in the power sector.

7. The then recently created National Economic Recovery and Reconstruction Program was to manage implementation of tsunami-related rehabilitation and reconstruction projects. The project management unit (PMU) comprised a project manager and the following five units: (i) planning and programming, (ii) procurement, (iii) finance and accounting, (iv) M&E, and (v) technical and implementation. To ensure coordination among sectors, the government was to establish a project coordinating committee.

8. The two potential risks identified at the time of processing were related to (i) slow approval procedures and lack of adequate capacity hampering implementation agencies, and (ii) governance-related issues, including corruption. With regard to the first risk, the government streamlined the approval procedures for all projects, and a project coordinating committee was to ensure coordination among sectors during implementation. The selected implementing agencies had considerable experience in implementing ADB-financed projects and were expected to be familiar with ADB procedures. Specialized consultancy inputs were to be provided to assist the PMU and the implementing agencies. The governance-related risks were to be addressed through detailed subproject selection criteria, transparent implementation and monitoring mechanisms, and specific financial controls, including regular as well as random audits.

9. The project had 13 loan covenants, which included the establishment of a PMU, a formal grievance procedure, and generation of monthly and quarterly reports and a final project completion report (PCR), among others.

10. Two technical assistance projects (TAs) and one grant supported this project. These related to: (i) Promoting Sound Environmental Management in the Aftermath of the Tsunami Disaster for $400,000 to introduce sound environmental management to complement the assistance for the reconstruction of physical infrastructure in the water and sanitation sector; (ii) Poverty and Environment Program for $250,000 to help save damaged fruit trees; and (iii) Restoration of Livelihoods of Tsunami-Affected Farmers for $1 million to help restore the livelihood of affected farmers by providing inputs, training and extension services and small loans to farming families, to complement the intervention in the agriculture sector.

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8 ADB. 2005. *Grant Assistance to the Maldives for Restoration of Livelihoods of Tsunami-Affected Farmers*. Manila (from the Japan Fund for Poverty Reduction) (Grant 9066).
II. EVALUATION OF PERFORMANCE AND RATINGS

A. Relevance of Design and Formulation

11. The PCR rated the project as relevant. The project was designed to meet the requirements of the tsunami recovery as determined by the joint needs assessment and as requested by the government. The sectors chosen for ADB assistance and ensuing project designs were in support of the government’s overall development priorities (PCR, para. 76). The project was timely as it was approved within the 12 weeks from needs assessment as stipulated in ADB’s DEAP. However, this validation notes that the project design had a number of shortcomings. One of these pertained to the inclusion of the fisheries and agriculture sectors where ADB’s experience was limited in the Maldives, and where other development partners were already involved. ADB’s experience also, at that time, in water supply, sanitation, and solid waste management had been limited to a $1.51 million WSS component of the Regional Development Project. In comparison, ADB had more experience in the transport, information and communications technology, and energy sectors. Demand for loans from the microcredit programs in fisheries and agriculture was low due to the availability of microcredit from other sources, which had relatively more attractive features such as higher limit and longer repayment period.

12. Further, the total amount of assistance was spread across five sectors, resulting in a relatively limited amount allocated per sector. Sector allocation ranged from a low of $2.5 million each for agriculture and power, and a high of $4.0 million for WSS. The limited sector allocation reduced the flexibility in the subsequent selection of subprojects and in the number of interventions that could be taken up in any one sector. Specifically, the amount allocated to WSS was enough to fund the reconstruction of sewerage system in only one island (compared to the two planned). In the transport sector, the limited allocation plus the substantially higher-than-expected costs resulted in the reconstruction of only one of the three selected harbors. The situations of the energy sector were better after a reallocation of funds from the other sectors.

13. Changes in some project activities were made during implementation as adjustments were deemed necessary. Among these were the (i) non-inclusion of repairs to the Male airport and the smaller harbors as they were already covered by other donors, and (ii) provision of microcredit instead of cash grants in the agriculture and fisheries components on the grounds that cash grants were not sustainable owing to lack of transparency. Considering the above shortcomings relating to project design, this validation rates the project less than relevant.

B. Effectiveness in Achieving Project Outputs and Outcomes

14. The PCR did not explicitly rate the project in terms of effectiveness. Nonetheless, it mentioned that the revised outputs resulting from the adjustments were mostly achieved, and these contributed to achieving the single outcome of restoring economic activities and livelihoods. The project’s emergency nature necessitated some changes that were deemed necessary to respond to the changing circumstances and realities of planning and design in light of the ground realities.

15. Since there were no measurable performance indicators for outcomes at the time of approval, this validation evaluated the project’s effectiveness largely in terms of achievement of outputs. While reconstruction work in transport, power, and WSS were reported to be well

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9 ADB. 1999. Report and Recommendation of the President to the Board of Directors: Proposed Loan to the Republic of the Maldives for the Regional Development Project. Manila (Loan 1695, for $8 million).
designed and functioning well, fewer than planned activities were delivered to achieve outputs and outcomes as appraised. This could be attributed to the government’s request to “build back better.” Fewer subprojects successfully delivered the intended outputs in agriculture and fisheries. In agriculture, only the subproject involving the development of a farmer’s handbook on agricultural practices, provision of training and strengthening of extension services succeeded in meeting most of its objectives. The rehabilitation of facilities at a research station was not carried out as the project had to be closed within the time frame set by the DEAP.

16. The establishment of pilot demonstration farms organized around farmer cooperatives was abandoned after international consulting support ended. This was a result of a number of reasons, including the following: (i) an insufficient concept of community cooperation, with farmers ending up disagreeing on the work, some not doing a fair share, leaders resigning or taking a disproportionate share of profits or credit, and, in some cases, nonparticipating islanders vandalizing the facilities; (ii) inability of local consultants to assist with marketing efforts; (iii) lack of economies of scale in shipping produce to population centers, coupled with the prohibitive cost of power and maintenance to operate irrigation pumps; and (iv) a drop in produce prices as the government liberalized importation of fresh produce, making the outer island farmers less competitive. The microcredit program in agriculture was canceled due to lack of demand. Overall, this validation rates the project less than effective.

C. Efficiency of Resource Use in Achieving Outputs and Outcomes

17. The PCR, which did not explicitly rate the project in terms of efficiency, noted that “the projected economic benefits for the project were generally achieved.” This validation rates the project as efficient in achieving outputs and outcomes, and echoes the reminder of the PCR from ADB’s DEAP. The said policy points out that it is not ADB’s thrust to insist on stringent cost recovery practices in these circumstances (i.e., immediate period following the disaster), as the main purpose of emergency assistance loans is the immediate restoration of damaged basic structures, infrastructure, and productive activities.

18. The PCR adequately discusses the efficiency of the project and its various components in terms of economic internal rate of return (EIRR). The reestimated EIRR at completion for the energy, transport and water supply and sanitation sectors exceeded the cut-off rate of 12%, although lower than appraisal estimates. The lower-than-expected EIRRs were mainly a result of the higher-than-estimated capital and operating costs. No EIRR was calculated for the agriculture and fisheries sectors. The overall implementation period of 3.25 years also compares favorably with the time taken and delays to implement similar emergency projects in other countries. The project completion date was extended twice from 30 September 2007, to 30 June 2008, and to 31 August 2008 mainly because of delays resulting from (i) a shortage in government staff, (ii) the need for ADB to align with other donor-funded works; (iii) changes in government structure in 2005 and the national election process in 2007; and (iv) adjustment in scope as actual restoration costs became known only after the detailed designs were completed and initial tenders issued.

10 At the time of the PCR, the project-funded power station at Madifushi Island was not operational due to disagreements between the island development committee and the government.

11 The South Asia Regional Department commented that this is an important concept for disaster recovery in general, where replacing damaged infrastructure with better, safer and more resilient structures, even at the expense of funding fewer subprojects, has become a guiding principle in disaster recovery circles.

12 An Independent Evaluation Mission (IEM) was fielded to the Maldives in February–March 2011. The IEM gathered necessary evidence for the completion of the County Assistance Program Evaluation (CAP:MLD 2011–21), administered a perception survey for selected stakeholders, and conducted a consultation workshop to share and discuss the preliminary findings with government representatives. The Tsunami Emergency Assistance Project was one of the projects that the IEM looked into.
D. Preliminary Assessment of Sustainability

19. The PCR did not explicitly rate the project in terms of sustainability, but it conveyed serious concerns with regard to the power and sewerage components. This validation shares these concerns. In the energy sector, tariffs were not enough to cover the full cost of power generation in the islands. Meanwhile, the WSS and transport sectors do not have a system for charging user fees. Thus, the funding of operation and maintenance (O&M) costs is a concern. While care was taken to ensure that adequate technical capacity for O&M was available (in some cases by providing detailed manuals for O&M), the continued functioning of the facilities will depend on government subsidy for the power utilities and overall financing of O&M expenses for the WSS facilities and harbors. As noted by this validation, there is a lack of forward looking plans (e.g., cost recovery through tariffs and user fees) for the sustenance and preventative maintenance of the facilities built under these components, probably because of more immediate concerns regarding recovery and reconstruction.

20. The PCR notes that the sustainability issue could be addressed through greater local autonomy and the planned grouping of atolls into seven provinces, and assigning to each province a multisector utility company, which will have the autonomy to set user fees and tariffs. However, the PCR is aware that these measures will take time to be developed. The government’s ability to muster enough public support through extensive public consultation and information campaign is also important. On the whole, this validation rates the project less than likely sustainable.

E. Impact

21. The PCR did not explicitly rate the project’s impact. It, however, pointed out that the project contributed to sustainable economic growth by minimizing the devastating impact of the tsunami. The PCR cites the successful construction of new infrastructure that helped improve the standards of living and economic opportunities of thousands of Maldivians, the participatory approach of the project, which resulted in stronger ownership of island communities over the new facilities, and the successful implementation of the fisheries component. One unintended positive impact of the project was the pressure it exerted on the government to introduce measures aimed at addressing the sustainability of the facilities (particularly the sewerage and power systems) in the islands.

22. This validation, although recognizing the project’s contribution toward minimizing the devastating impact of the tsunami, rates the project’s impact as moderate. This is mainly because of the shortfall in achievements as mentioned in the discussion on effectiveness. Future impact of the project is likewise dependent on the sustainability issues being addressed.

III. OTHER PERFORMANCE ASSESSMENTS

A. Performance of the Borrower and the Executing Agency

23. The PCR rates the performance of the executing agency, borrower, and implementing agencies as satisfactory. This validation concurs with this rating. The PCR reiterated that the 11-month extension of the project completion date was mainly due to lack of government staff members, the extra challenge of looking after multiple donor projects simultaneously and giving attention to atoll and island officials, along with complicating factors such as the government reorganization in 2005 and the election of a new government in 2007 (which resulted in another reorganization in 2008). The PCR also cited the lack of basic environmental regulations as a
reason for the delay, as it hampered design efforts, although there was no explanation provided about this. The PCR likewise observed that while the government failed to establish a formal grievance procedure (Loan Covenant No. 9)—a failure which did not materially affect the quality of the project or works—grievances were accepted and acted on by either responsible ministry or island governments.

B. Performance of the Asian Development Bank

24. This validation supports the PCR’s assessment of ADB’s performance, which was rated satisfactory, based the following: (i) ADB’s participation in the joint needs assessment within 2 weeks after the tsunami, and the sense of urgency with which ADB prepared and approved the project; (ii) the fielding of an Extended Mission to the Maldives, which was fully operational by August 2005 and which liaised with the government, other donors, and beneficiary islands, and supported ADB missions to the Maldives; and (iii) the conduct of periodic missions to review the project components, and provide timely response and decisions on various administrative matters such as contract approvals, reallocation of funds, and engagement of consultants.

25. ADB also demonstrated how it can go the extra mile by funding a technically better option in the reconstruction of the harbor at Dhidhdhoo Island, which is the atoll capital, compared to the original plan of adopting the conventional option (which cost less but was technically inferior).

C. Others

26. The PCR gives adequate account of the unforeseen negative health impact (proliferation of dengue mosquitoes) of the project-funded sewage storage pond. Because of the negative health impact, the pond remains closed and the primary effluent is being pumped directly to the ocean without secondary treatment. Although the PCR explains that there have been no complaints about negative environmental impacts, and fishing in the area is still done, this is a potential problem that should be monitored.

27. Aside from mentioning that procurement conformed with ADB guidelines and was in agreement with the methods prescribed in the financing agreement and the government’s Tsunami Relief and Reconstruction Fund Operations Manual (p. 15, para. 67), the PCR also cited the government’s compliance with Loan Covenant No. 10 about following sound accounting and auditing principles.

28. During the processing of this emergency assistance, the importance of strengthening the anticorruption mechanism for the Quick-Disbursing Component (which is considered a government-freehand component) was underscored. The PCR noted that there were no major problems associated with this component. The PCR also mentioned that annual and random performance audits were conducted for all project activities (Appendix 6, Covenant 11. p. 45).

IV. OVERALL ASSESSMENT, LESSONS, AND RECOMMENDATIONS

A. Overall Assessment and Ratings

29. Overall, the PCR rated the project successful. This validation, however, downgrades this rating to less than successful based on its assessment of the project being less than relevant, less than effective, efficient, and less than likely sustainable (see table).
Overall Ratings

<table>
<thead>
<tr>
<th>Criteria</th>
<th>PCR</th>
<th>IED Review</th>
<th>Reason for Disagreement and/or Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>Relevance</td>
<td>Relevant</td>
<td>Less than relevant</td>
<td>The project design had a number of shortcomings (para. 11). In addition, the loan amount was spread too thinly across five sectors (para. 12) to really make a significant impact.</td>
</tr>
<tr>
<td>Effectiveness in achieving outcomes</td>
<td>Not explicitly rated</td>
<td>Less than effective</td>
<td>Fewer than planned activities were delivered to achieve the project outputs and outcome especially in the transport, power, and WSS sectors. Fewer subprojects were successfully delivered to achieve the intended outputs in fisheries and agriculture (para. 16).</td>
</tr>
<tr>
<td>Efficiency in achieving outcomes and outputs</td>
<td>Not explicitly rated</td>
<td>Efficient</td>
<td>Reestimated EIRRs at completion still exceeded the 12% cut-off. The overall implementation period compares favorably with that of similar emergency projects implemented in other countries (paras. 17–18).</td>
</tr>
<tr>
<td>Preliminary assessment of sustainability</td>
<td>Not explicitly rated</td>
<td>Less than likely sustainable</td>
<td>This validation shares the concerns raised by the PCR regarding the funding of operation and maintenance costs (para. 20).</td>
</tr>
<tr>
<td>Overall assessment</td>
<td>Successful</td>
<td>Less than successful</td>
<td>This validation rated the overall project less than successful, aggregating the individual ratings above.</td>
</tr>
<tr>
<td>Borrower and executing agency:</td>
<td>Satisfactory</td>
<td>Satisfactory</td>
<td></td>
</tr>
<tr>
<td>Performance of ADB</td>
<td>Satisfactory</td>
<td>Satisfactory</td>
<td></td>
</tr>
<tr>
<td>Impact</td>
<td>Not explicitly rated</td>
<td>Moderate</td>
<td>See para. 22.</td>
</tr>
<tr>
<td>Quality of PCR</td>
<td>Less than satisfactory</td>
<td>Satisfactory</td>
<td></td>
</tr>
</tbody>
</table>

ADB = Asian Development Bank, EIRR = economic internal rate of return, IED = Independent Evaluation Department, PCR = project completion report, WSS = water supply, sanitation, and solid waste management.

Note: From May 2012, IED views the PCR's rating terminology of "partly" or "less" as equivalent to "less than" and uses this terminology for its own rating categories to improve clarity.

Source: ADB Independent Evaluation Department.

B. Lessons

30. This validation agrees with the lessons identified by the PCR. An additional lesson identified from this project is the need for ADB to focus more on sectors in which it has substantial experience, from which it can draw from during the relatively fast pace of processing and implementing an emergency project. Also, given limited resources, sector selectivity is important to ensure a significant impact. Moreover, emergency project designs should likewise incorporate provisions for O&M of project facilities to ensure their sustainability.

C. Recommendations for Follow-Up

31. This validation supports the recommendations presented in the PCR. In addition, this validation recommends follow-through assistance in the form of a TA for the conduct of ability-to-pay and willingness-to-pay studies, which can inform the public consultation and information campaign for ensuring the sustainability of infrastructures constructed under the sewerage and power components. Such a TA could focus on: (i) ability-to-pay and willingness-to-pay studies;
and (ii) provision of social marketing-social mobilization expertise for the conduct of related public consultations and information campaign.

32. Further, it would be helpful to make follow-ups regarding the adoption of sustainability mechanisms such as subsidy, tariffs or user fees for the sustenance and preventative maintenance of the power and sewerage systems and the process of public consultations needed. Learning from these aspects can guide ADB in supporting DMCs in the case of emergency support.

V. OTHER CONSIDERATIONS AND FOLLOW-UP

A. Monitoring and Evaluation Design, Implementation, and Utilization

33. The PCR has no explicit discussion on whether there was adequate and effective M&E, nor a discussion about strengthening of M&E capacity of government by project consultants. In the absence of a central PMU to oversee and coordinate the implementation of the tsunami recovery, and the rushed phasing of the project and that of other tsunami recovery programs of other donors that competed for attention from limited technical staff from government, M&E may have been inadequate. The partial compliance with loan covenants 12 and 13 that relate to M&E seems to confirm this weakness.

B. Comments on Project Completion Report Quality

34. The quality of the PCR is less than satisfactory. The PCR provided generally adequate information on the emergency nature of the project and the resultant challenges in design and implementation. It also provided extensive discussions of lessons learned and offered recommendations that could be valuable to related future undertakings. However, it should have rated project performance by criteria more explicitly. Also, there are discussions that go beyond the theme of the headings (e.g., discussing successful completion of activities when what should be discussed is relevance; and discussing related TAs under the heading of effectiveness without clearly establishing how the related TAs contribute to project objectives). Furthermore, para. 3 of the PCR mentioned that ADB provided three TAs to support the project. However, one of these three was actually a grant and not a TA.

C. Data Sources for Validation

35. The following reports and documents were referred to in the preparation of this PCR validation report:

   (i) PCR, report and recommendation of the President, financing agreement, and program administration memorandum;
   (ii) Minutes of management review meetings;
   (iii) Board information papers;
   (iv) Loan review mission reports; and
   (v) Other Independent Evaluation Department evaluation reports.

D. Recommendation for Independent Evaluation Department Follow-Up

36. A project performance evaluation report may not be needed for this project.