



Validation Report

Reference Number: PVR-219
Project Number: 31381
Loan Number: 1767
December 2012

Sri Lanka: Protected Area Management and Wildlife Conservation Project

Independent Evaluation Department

Asian Development Bank

ABBREVIATIONS

ADB	–	Asian Development Bank
BCAP	–	Biodiversity Conservation Action Plan
BDS	–	Biodiversity Secretariat
CBO	–	community-based organization
DWC	–	Department of Wildlife Conservation
FFPO	–	Fauna and Flora Protection Ordinance Act No. 43 of 1993
GEF	–	Global Environment Facility
MENR	–	Ministry of Environment and Natural Resources
M&E	–	monitoring and evaluation
NGO	–	nongovernment organization
PACF	–	Protected Area Conservation Fund
PCR	–	project completion report
PMU	–	project management unit
PPA	–	pilot protected area
RRP	–	report and recommendation of the President
TA	–	technical assistance

NOTE

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

Key Words

adb, asian development bank, ied, independent evaluation department, pcr, project completion report validation, protected areas, protected area management and wildlife conservation, sri lanka

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PROJECT BASIC DATA

Project Number:	31381	PCR Circulation Date:	Nov 2010	
Loan Number:	1767 (SF)	PCR Validation Date:	Nov 2012	
Project Name:	Protected Area Management and Wildlife Conservation Project			
Country:	Sri Lanka		Approved (\$ million)	Actual (\$ million)
Sector:	Agriculture and natural resources	Total Project Costs: (SDR equivalent)	34.7 9.0	30.3 8.2
ADB Financing: (\$ million)	ADF: 11.6	Loan:	12.0	12.2
		Borrower:	7.7	4.6
	OCR: 0.0	Beneficiaries:	0.9	2.0
		Others:		
Cofinanciers:	Global Environment Facility Government of the Netherlands	Total Cofinancing:	14.1	11.5
Approval Date:	19 Oct 2000	Effectiveness Date:	6 Mar 2001	17 Sep 2001
Signing Date:	6 Dec 2000	Closing Date:	30 Jun 2007	31 Dec 2008
Project Officers:	A. Ruthenberg S. Ranawana M. Amerasinghe	Location:	ADB headquarters Sri Lanka Resident Mission Sri Lanka Resident Mission	
Validator:	J. Cook, Consultant	Peer Reviewer:	A. Morales, Evaluation Officer, IED1	
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ADB = Asian Development Bank, ADF = Asian Development Fund, IED1 = Independent Evaluation Department (Division 1), OCR = ordinary capital resources, PCR = project completion report, SDR = special drawing right, SF = special funds.

I. PROJECT DESCRIPTION

A. Rationale

1. Sri Lanka's high population density, levels of poverty and unemployment, and widespread dependence on subsistence agriculture exert considerable pressure on the country's protected areas. The protected area system covered 9,700 km² or 15% of Sri Lanka's land area and was central to conserving wildlife biodiversity. The protected areas were important in supporting rural economies through watershed protection, and add to the country's economic and cultural values by providing recreational, ecotourism, scientific, and educational opportunities. The project was designed on the premise that these protected areas and the services and benefits they provide were not effectively protected due to weak institutions; inadequate resources, lack of managerial skills, and low technical capacity throughout sector institutions; and the lack of cooperation between conservation agencies. Improvements in these areas were therefore warranted. Greater interagency cooperation was fundamental to strengthening these institutions and developing a strategic approach to addressing conservation priorities. Allowing local communities to be involved in planning their future and interacting with government agencies and the private sector were requisites for effective and sustainable protected area management. Part of this vision involved low-impact use of protected areas and communities and the private sector capturing benefits through ecotourism development.

B. Expected Impacts

2. The project framework in the report and recommendation of the President (RRP)¹ defines impact (goal) as enhanced protected area and biodiversity conservation for the benefit of current and future generations. It identified three performance targets: (i) sound management achieved by year 3, (ii) improved welfare in surrounding communities, and (iii) reduced illegal activity. The project completion report (PCR, para. 2) states that the planned impact was to (i) enhance the management of the protected area and the conservation of wildlife resources and biodiversity (a reasonable statement implying outcome), and (ii) reduce poverty in communities adjacent to seven pilot protected areas.²

C. Objectives or Expected Outcomes

3. The project framework states the project purpose (outcome) as follows: “strengthen protected area management and develop operational partnerships with local communities and other stakeholders to reduce illegal use of park resources.” There were eight performance targets identified focusing on policy, management, funding, stakeholder involvement, and increasing awareness. These are explicitly noted in the PCR (Appendix 2).

D. Components and Outputs

4. The project comprises the following four components.

5. **Component A** aimed at (i) strengthening the Department of Wildlife Conservation (DWC) to become a decentralized, credible, and effective department fully able to manage its policy development and operational responsibilities with results; (ii) enhancing the DWC’s technical capacity to be able to plan and implement complex conservation strategies; (iii) establishing ecotourism capacity and services; and (iv) establishing informed decision making with effective monitoring and evaluation at all levels.

6. **Component B** aimed to strengthen the management of seven pilot protected areas by (i) revising management plans and subsequently implementing adaptive management systems, (ii) providing supportive infrastructure and equipment to enable the staff to complete their work effectively, and (iii) expanding ecotourism services and products.

7. **Component C** sought to develop collaborative intersectoral planning through the preparation of the Biodiversity Conservation Action Plan (BCAP), a conservation system review, and endangered species management.

8. **Component D** would establish the Protected Area Conservation Trust, a sustainable financing mechanism for community-conservation interlinkages outside government.

E. Provision of Inputs

9. Project cost was estimated at \$34.7 million, with contributions from the Global Environment Facility (GEF) of \$9.0 million and from the borrower of \$7.6 million. Actual total expenditure at completion was \$30.3 million, comprising \$12.2 million from the Asian Development Bank (ADB), \$7.9 million from the GEF, \$3.6 million from the Government of the Netherlands, \$4.6 million from the Government of Sri Lanka, and \$2.0 million from beneficiaries. A doubling of beneficiary contribution was due to the large number of subprojects supported by the Protected Area Conservation Fund (PACF), each of which included a 10% beneficiary contribution. A total of 335 person-months of consulting services

¹ ADB. 2000. *Report and Recommendation of the President to the Board of Directors: Proposed Loan to Sri Lanka for the Protected Area Management and Wildlife Conservation Project*. Manila.

² ADB. 2010. *Completion Report: Protected Area Management and Wildlife Conservation Project in Sri Lanka*. Manila.

were utilized (up from 300 planned at appraisal), 115 of which were international (128 planned), and 221 domestic (172 planned).

F. Implementation Arrangements

10. The DWC was the executing agency for components A and B. The Ministry of Forests and Environment, the country's biodiversity focal point implemented component C. The Biodiversity Conservation Secretariat implemented the cross-sector activities including development of the BCAP. By the time this component became fully active, the DWC was under the Ministry of Environment and Natural Resources (MENR), which facilitated collaboration. As designed, component D was to be managed by a board of trustees of the proposed Protected Area Conservation Trust, and executed by consultants in the project management unit (PMU). When the trust was replaced with the fund, the PACF component was managed by a separate unit in the PMU that coordinated the outreach program through DWC staff and recruited facilitators rather than using local nongovernment organizations (NGOs) as envisaged. An interagency project coordinating or steering committee was to be chaired by the secretary of the Ministry of Public Administration and Home Affairs for cooperation and liaison with other agencies relevant to implementation.

II. EVALUATION OF PERFORMANCE AND RATINGS

A. Relevance of Design and Formulation

11. At formulation, the project was relevant to ADB's 1998 Country Operational Strategy,³ which included improved management of the natural resource base to ensure long-term sustainability. The project objectives were in line with the 2001 Country Strategy and Program Update,⁴ which aimed at sustainable reduction in poverty including the promotion of community-based natural resources management. The project has remained relevant to ADB's Strategy 2020, which espouses natural resource management and environmental protection to sustain long-term economic growth and reduce poverty.

12. The project is also consistent with the following government policies: (i) the 1995 National Forest Policy, which listed conservation of forests as one of its three main objectives, and (ii) the Sri Lanka Poverty Reduction Strategy Paper (2002), which underscored the importance of conservation and empowering local communities and civil society to play a greater role in natural resource management as an element for poverty reduction.⁵ Though the project was generally well designed, RRP lacked clarity in some places in describing project objectives and does not clearly state or separate outcome and impact. In the context of the GEF assessment, the consistency with policies and strategies and the involvement of the relevant stakeholders are bases for rating project relevance as highly satisfactory, to which this validation agrees. This validation concurs with the PCR assessment that the project remains *relevant*.

B. Effectiveness in Achieving Project Outcomes

13. The PCR (para. 43) indicates that the project achieved the target outcome of strengthening protected area management and developing operational partnerships with local communities and other stakeholders to reduce illegal use of park resources. The project had a slow start but built momentum from 2004. Eventually, a stronger organizational structure within the DWC was established to manage protected areas across the country, although not all newly created posts had been adequately filled by project closing. Delegation of management responsibility to protected areas improved decision making at the field level and contributed to a greater commitment from staff. Almost all proposed outcome

³ ADB.1998. *Country Operational Strategy for Sri Lanka*. Manila.

⁴ ADB. 2001. *Country Strategy and Program Update: Sri Lanka, 2009–2011*. Manila

⁵ Government of Sri Lanka. 2002. *Poverty Reduction Strategy Paper: Sri Lanka*. Colombo.

targets were achieved. Exceptions were the minimal success in engaging the private sector and NGOs in visitor services and ecotourism activities, poorly developed monitoring systems, and the DWC's reluctance to recruit staff from outside the department. Almost 500 middle-rank staff and some rangers participated in 28 study tours and formal training events in Asia, South Africa, East Africa, North America, and Europe, thereby establishing personal contacts with international NGOs and other agencies. Efforts to reduce the encounters between herds of elephant and community were successful, although the problem remains severe in many areas.

14. Component C activities implemented by the MENR appear to have been successful including (i) the national BCAP, (ii) the protected area gap analysis (conducted to review the adequacy of the protected area system), and (iii) analysis of the status of endangered species.

15. In total, 204 subprojects were implemented by or through community-based organizations (CBOs) under the PACF (component D), involving infrastructure construction (45% of projects) and revolving funds for income generation (55%). A review commissioned in 2008 found that 86% of subprojects were successful. However, loan repayments to the revolving funds were only 68%, likely reflecting the poor microcredit culture in Sri Lanka more than poor subproject performance. The DWC also contracted with CBOs to clear firebreaks or remove invasive species. Overall, the rather poor relationship between the DWC and local residents was reported to have improved under the project. Unfortunately, all 44 field facilitators and 7 project officers recruited under the project to assist the DWC had to be discontinued at loan closure. In the context of GEF assessment, this validation agrees with the satisfactory rating, given that most of the outcome targets were achieved after the project was extended. Overall, this validation supports the PCR's project rating of *effective*.

C. Efficiency of Resource Use in Achieving Outputs and Outcomes

16. Process efficiency was poor in the early years as several changes in ministerial responsibilities, in DWC staff, and in project management arrangements contributed to the DWC's lack of ownership. References in the RRP to privatization and the involvement of international NGOs were contentious for Sri Lankan wildlife activists and led to a protracted court case initiated in mid-2002. The case was settled out of court in 2005 but the DWC was prohibited under the agreement from extending the project. In 2006, the government requested an extension, which ADB could not approve until the prohibition ended in March 2007. The intervening uncertainties, however, had impeded progress. Government approval of the technical assistance (TA) contract was delayed 14 months and initial inputs by large numbers of consultants could not be absorbed by the DWC. Moreover, the project design had set ambitious time targets for complex institutional and legal reforms, not recognizing that the required bureaucratic procedures would be lengthy. These factors contributed to a slow start and required several design amendments. The revision of the Fauna and Flora Protection Ordinance (FFPO) Act No. 49 of 1993 also had an unrealistic time frame, failing to consider the extraneous factors in Sri Lanka that affect amendments to the FFPO.

17. The PCR estimates the economic internal rate of return at 22.5%, compared to 18.0% at appraisal. This validation would question some of the PCR assumptions, particularly the rate of growth of benefits, which increase from \$1.3 million in 2010 to \$32.1 million in 2020, a rate of compound growth of 38% per year. Even from the estimated \$8.7 million in 2014, the growth rate to year 2020 is almost 25% per year. The increased revenue derives from a combination of increases in visitor numbers and in real prices for both domestic and international visitors at 5% per year. The incremental benefits of \$32 million are associated with an initial capital cost of \$22 million and recurrent costs of \$87,000 per year, which do not increase over the period despite the increase in visitor numbers. It appears that the assumptions for the projections cannot be all attributable to the project. It is accepted that rapid increase in tourism revenues is likely due to the end of civil conflict and

the improved facilities and park management, but these are unlikely to be of the order indicated. Detailed study would be required to derive figures that are more accurate. A reassessment would be likely to result in a significantly lower economic internal rate of return. Despite this criticism, the PCR and RRP both make the point that there are unquantified benefits relating to biodiversity.

18. The GEF assessment gave the same reasons for giving a satisfactory rating for efficiency. Overall, based on available data, the rating of *efficient* for the project proposed by the PCR and the GEF is supported.

D. Preliminary Assessment of Sustainability

19. The PCR rated project sustainability *likely*. This was based on the assessment that the project directly strengthened the capacity and resources of the DWC as the agency was better equipped and amenable to implement best practices. The PCR added that many of the project's interventions have been institutionalized within the DWC, including (i) structural reform, (ii) devolved management, (iii) improved protected area planning and management, (iv) regular biodiversity studies, and (v) enhanced visitor services. Such interventions have already had a positive impact on other protected areas. The new DWC head office building envisaged under the project, but canceled because of legal objections, was later constructed with government funding. This demonstrated government commitment and support. The government's approval for the deposit of 50% of protected area revenues in the Wildlife Preservation Fund for conservation activities was expected to further strengthen field activities, if institutionalized.

20. The habitat enrichment program was reported to be successful in achieving the project's physical targets. However, some areas cleared of invasive species reverted to their original state (e.g., Uda Walawe National Park, as per government PCR, page 23). Visitor centers constructed under the project were reported to be used but no information was provided on the number of visitors—basic information that should have been collected under the project. Most visitor centers faced significant design and maintenance problems, which the DWC needs to address if these centers are to continue to be effective.

21. The project supported the installation of communications equipment in each protected area. However, at the time of the government's PCR, only two of the eight protected areas had fully or partly operating systems. The PCR also indicated that mobile phones were now mainly used for communications, making radio systems redundant. None of the pilot protected areas (PPAs) had a functional management information system during late 2008, due to breakdown of the computer network system. All PPAs were issuing tickets manually and most had no internet access.

22. The laying off of the outreach staff at the end of the project jeopardized the sustainability of the outreach program, which is important for maintaining positive relationships between the protected areas and surrounding population. The protected areas mainly have either one or no outreach officers (government PCR, page 31), suggesting that the DWC placed a relatively low priority on outreach, in addition to constraints on its budget, despite an agreement to allow it to retain 50% of park entrance fees. The staffing issue was the only main concern raised by the GEF assessment in providing a *moderately likely* rating for sustainability. Despite the issues outlined, the department is now operating at a higher level than previously, and communities are now more aware of the need to maintain protected areas. Overall, project outcomes are *likely sustainable*.

E. Impact

23. The project had positive environmental impact through (i) improved protected area management, (ii) reduced encroachment, and (iii) enhanced biodiversity conservation. From

a socioeconomic perspective, the project provided benefits to communities in areas adjacent to protected areas through its PACF program, which supported around 200 small activities and enterprises. Improved park management brought benefits to visitors and generated revenues. Costs to local communities such as reduced access to crop and grazing lands were acceptable to the community people. These were part of the Biodiversity Conservation Plans and resource management, which were prepared in consultation with local communities. The project provided 315 km of electric fencing, which reduced human–elephant contact by confining many elephants to the protected areas. The project adopted a participatory approach, and as far as possible worked with communities, mobilizing and supporting 167 CBOs and cluster forums, providing a basis for improved community interaction and consultation. Similarly, the GEF assessment also cited similar positive environmental impacts of the project. The DWC’s institutional reforms, including decentralized protected area planning management, provided a stronger base for its national wildlife conservation responsibilities. However, the PCR did not provide a rating for the project’s impact. This validation concurs with the assessments of both the GEF and the PCR and assesses impact as *significant*.

III. OTHER PERFORMANCE ASSESSMENTS

A. Performance of the Borrower and Executing Agency

24. The PCR provided a rating of *satisfactory*. The DWC was initially short of staff, subjected to three changes in its host ministry, and initially showed lack of ownership, which constrained project performance. The DWC failed to make office space available to consultants, which had a negative impact on their relationship. The performance of the DWC, MENR, and the Biodiversity Secretariat (BDS) improved as they took more ownership of the project and learned ADB procedures. Although only partly satisfactory during the project’s first 2 years, by closure, performance was satisfactory.

25. The DWC did not initially receive the support needed from its ministry to launch such a complex undertaking. In 2002, the MENR became the host ministry for all implementing agencies, facilitating collaboration between the DWC, BDS, and PACF. However, decision making and action remained slow and in late 2003, ADB raised the possibility of loan suspension. The project management structure was changed as a result and progress improved dramatically from 2004 (PCR, para. 12) with field staff committed to the project and its objectives. The outreach program went smoothly after field staffing issues were resolved. The BDS implemented component C. It performed well under the MENR despite the failure to appoint a deputy director. Most covenants were complied with, though some were partial and some late, including the delayed appointment of managers and staff. Borrower contributions to project costs totaled \$4.6 million against a target of \$7.6 million. Overall, poor performance over the first 3 years of the project is more than counterbalanced by improved performance from then to project closure. Overall, this validation concurs with the rating of *satisfactory*.

B. Performance of the Asian Development Bank

26. The project was supervised by the Sri Lanka Resident Mission from its inception. In total, ADB sent 13 review missions over the 7-year implementation period, with two or more missions in most years, highlighting the ability of resident missions to provide close supervision. Interestingly, there were only two project officers over the entire project period, a significant benefit in terms of continuity. ADB was flexible in allowing changes to design, supported by its cofinanciers. This validation rates overall ADB performance as *satisfactory*, just as the PCR did.

C. Others

27. While project documents did not mention social and environmental safeguards, project activities were intended to support livelihood development in adjacent communities and protect and enhance the environment. The CBOs achieved reasonable gender balance, with an average of about 50% female membership. However, the proportion of female chairpersons (12%) and secretaries (26%) was low (PCR, Appendix 8). The PCR mission considered that, among the 18 community organizations visited during field visits, those that had women holding leadership positions were more successful.

28. In relation to governance, the DWC's introspective nature was a main issue. In almost every situation where external actors were intended to contribute to DWC policy or operation, the proposal was rejected. Some examples of this in the PCR's Appendix 2, include the following: (i) new decentralized management plans prepared by an MENR task force and approved by the Cabinet in June 2005, but internal bureaucracy and strong reluctance within the DWC to recruiting staff from outside delayed implementation; (ii) a corporate plan for DWC and a manual of procedures for delegated functions were completed by TA consultants in early 2007 and adopted by the DWC, but since internal candidates did not have the required years of experience and/or qualifications, posts were filled by in-house staff on a covering basis; and (iii) twinning was not adopted due to the DWC's reluctance and public opposition to use of international NGOs.

29. While it is difficult to draw firm conclusions from these actions, the implication is that the DWC was resistant to transparency. Although the reasons for this are not apparent from project documents, these could include the following: (i) belief that only the DWC and its staff had the required knowledge and skill to implement the project, or conversely lack of confidence, (ii) a wish to keep activities tightly under DWC control, or (iii) a fear of outside involvement, particularly given their past experience with public criticism.

IV. OVERALL ASSESSMENT, LESSONS, AND RECOMMENDATIONS

A. Overall Assessment and Ratings

30. The PCR rated the overall project *successful* and this validation concurs with the *successful* rating (see table).

Overall Ratings

Criteria	PCR	IED Review	Reason for Disagreement and/or Comments
Relevance	Relevant	Relevant	
Effectiveness in achieving outcome	Effective	Effective	
Efficiency in achieving outcome and outputs	Efficient	Efficient	
Preliminary assessment of sustainability	Likely sustainable	Likely sustainable	
Overall assessment	Successful	Successful	
Borrower and executing agency	Satisfactory	Satisfactory	
Performance of ADB	Satisfactory	Satisfactory	
Impact	None	Significant	There were both positive environmental and socioeconomic impacts from the project (para. 23).
Quality of PCR		Satisfactory	Refer to para. 35.

ADB = Asian Development Bank, IED = Independent Evaluation Department, PCR = project completion report.
Source: ADB Independent Evaluation Department.

B. Lessons

31. The PCR identified the following useful lessons, to which this validation agrees:
- (i) Reference to international NGOs and public–private partnerships in the RRP provoked local wildlife activists and politicians, resulting in project delays. This could have been avoided by exerting wider efforts in pre-project public relations.
 - (ii) Launching a complex project through the DWC, a small organization faced with structural reform, was overambitious. A two-phased approach would have been preferable.
 - (iii) Loan covenants underestimated the time required for government to amend the FFPO and establish institutional reform.
 - (iv) Introducing large numbers of TA consultants into an understaffed DWC resulted in inefficient use of consultancy expertise.
 - (v) The outreach program became more sustainable by being implemented by the executing agency's own staff than it would have been by recruiting outside NGOs, who would have left when the project closed.
 - (vi) Delegation of powers to the field enhanced protected area management but also increased the importance of self-motivated protected area leadership.
 - (vii) Government bureaucratic cultures and limitations should be recognized in setting up project implementation and monitoring mechanisms. Government institutional cultures are often not attuned to project needs. More emphasis could have been given to the staffing of the PMU, perhaps by including more individuals from outside government and, importantly, a monitoring and evaluation (M&E) specialist.

C. Recommendations for Follow-Up

32. The PCR gives a number of recommendations, including the following: (i) the DWC should repeat the biodiversity studies in PPAs every 10 years from 2016 onwards to assess changes. The BDS is repeating the threatened species Red List studies every 5 years; (ii) The DWC should urgently fill the protected area management director post and the vacant facilitator positions to maintain the momentum of the community outreach program; (iii) copies of relevant management plans should be retained in each PPA; (iv) the Ministry of Environment should urgently fill the vacant deputy director post at BDS; and (v) further strengthening of the institutions involved in wildlife conservation is desirable.

33. The PCR recommends that ADB should favor internalizing community activities, by working with the implementing agency, in preference to using NGOs to ensure sustainability. This validation considers that while it is clear that the DWC favored this approach, there are also positive aspects to using NGOs, which includes the following: (i) allowing for intensive activity during implementation without loading the department with staff whose ongoing employment may not be justified or affordable, and (ii) limiting the potential for poor governance.

V. OTHER CONSIDERATIONS AND FOLLOW-UP

A. Monitoring and Evaluation Design, Implementation, and Utilization

34. The PCR (para. 17) states that project monitoring was undertaken by the PMU but a comprehensive M&E system was not developed. Baseline socioeconomic and biodiversity surveys were completed only at project closure so that impact assessment was not feasible (PCR, para. 59). The project framework in the RRP was weak, and was further developed in the project administration memorandum. The project would have benefited from regular updating of the design and monitoring framework and monitoring against framework objectives.

35. There is little mention of M&E in project reports over the early years of the project. However, the aide memoire of the November 2006 review mission indicated that “M&E, on the financial, physical, and process, needs to be strengthened. A participatory M&E system, involving the community, park staff, and other governmental agencies needs to be developed.” This validation considers that this was rather late in the project period to be suggesting new systems. Participatory monitoring should have been built into project design.

B. Comments on Project Completion Report Quality

36. The Independent Evaluation Department assesses the quality of the PCR as *satisfactory*. The PCR follows the Project Administration Instructions No. 6.07A.⁶ Lessons and recommendations are considered appropriate and relate well to the PCR’s analysis.

37. The government PCR was also satisfactory, providing detailed information on project implementation and the problems experienced and addressed. The document provides an unusual level of coverage of consultant and contractor performance.

C. Data Sources for Validation

38. The sources of data for this validation consist of the following: (i) project’s RRP; (ii) loan review reports, and aide memoires of ADB missions and related correspondence; (iii) ADB PCR; and (iv) government PCR.

D. Recommendation for Independent Evaluation Department Follow-Up

39. The agriculture and natural resources sector is no longer a priority for ADB support in Sri Lanka. Although there are valuable lessons to be learned from several aspects of the project, no follow-up by the Independent Evaluation Department is justified.

⁶ ADB. 2009. Project Completion Report. *Project Administration Instructions*: PAI 6.07A. Manila.