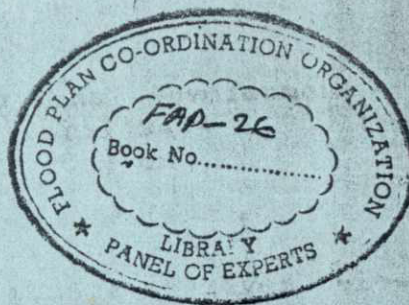


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FAP-26

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BANGLADESH WATER DEVELOPMENT BOARD

FAP-26

B.W-828
A-986

Ref-2412
26-02

COMMENTS ON
STUDY FOR FPCO ON "INSTITUTIONAL
DEVELOPMENT PROGRAMME INTERIM
REPORT NO.1 (APRIL'94)"

FAP-26

B.W-826

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JUNE 1994

Case - 986
FAP-26

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BANGLADESH WATER DEVELOPMENT BOARD

BN-828
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26-02

COMMENTS ON
STUDY FOR FPCO ON "INSTITUTIONAL
DEVELOPMENT PROGRAMME INTERIM
REPORT NO.1 (APRIL '94)"

JUNE 1994

Comments on study for FPCO on "Institutional Development
Programme Interim Report No.1 (April '94)"
Prepared by Panel of Experts (POE) on
Institutional Issues.

The comments and observations on the report is given below :

(1) Page 2, Para 1.6

It needs to be mentioned under which organizations the studies were initiated. FAP 5 and also FAP 4 were continuations.

(2) Page 2, Para 1.7

It is mentioned that second FAP conference had focussed on priority of future FAP project within national development budget. This was an agreed principle between the donor and GOB that FAP studied projects would get the priorities for investment at projects. This was the basis of taking up such a gigantic T.A. Programme. So the viable FAP studies projects should get their place in the investment programme and FPCO needs to pursue the same with GOB and donors who financed the T.A.

(3) Page 3, Para 1.10

Views of the panel of experts related to the projects, beyond the jurisdiction of FAP study should be stated. Detailed information have to be provided in respect to their implementation.

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(4) Page 4, Para 1.13

Main task of FPCO is project planning and as such it is better to bring FPCO within the Planning Wing of BWDB so that the same agency is responsible for planning, implementation and O & M of projects.

(5) Page 4, Para 1.11

Since the report was prepared in April '94, why the progress up to Dec'1993 was shown instead of March'1994. Moreover it is found that only 36% of the final reports of FAP studies were submitted up to Dec'1992, 61.54% progress were seen in Dec'1993. At this rate, about 96% of reports is expected to be submitted by Dec'1994. With this trend of progress, only 4% progress/works will remain for which the proposal for extension up to Dec'95 become questionable.

(6) Page 5, Para 1.16 & Table 1.2

Information on the nos. of projects and investment size given in para 1.16 and Table 1.2 are confusing which needs correction.

(7) Page 6, Para 1.19

Major Water Development Projects studies are being done by FPCO and not by BWDB itself. As such BWDB's normal work loads are expected to reduce with the completion of projects as scheduled. Implementation of FAP studies projects are not coming as timely as was anticipated. Annual investment size of FAP project of about US \$ 400 million is not foreseen. The

expectation that per annum investment size for FAP Projects alone would be about US\$ 400 million, and that it will more than double the amount that is currently allocated to BWDB, is based on two major underlying assumptions. Those are,

- a. all the indicated projects will be technically feasible, socially and environmentally acceptable, and financially viable and competitive.
- b. The necessary fund for investment will be available from the development partners and or the GOB.

Unless these assumptions are verified and found valid, the expectations remain formal, instead of being real.

However, if it comes BWDB's capability will have to be increased. Given the fact that key and policy making positions being vacant for long periods and recognizing other implementation constraints BWDB's performance in utilization of ADP should be considered as satisfactory (between 70% to 90%) if compared with others.

(8) Page 8, Table 1.4

Percentage calculations in Nos. of projects column need correction.

(9) Page 9, Para 1.22, Table 1.5

Figures in the table shows the exact ADP utilization by BWDB, not the organizational capacity. An organization may

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have much more capacity (potential); but under certain conditions the capacity may not be fully utilized, Table 1.7 (Page 11) will support the above view.

(10) Page 10, Para 1.24

The indicator used to evaluate the utilization/implementation capacity (i.e. the utilization of ADP budget) is not valid. the reasons are as follows:

a. ADP budget is not based on BWDB's capacity of utilization, rather sectoral resource allocation by the govt. So ADP budget cannot be the valid indicator which has to be more realistic.

b. In 1986-87 the Dhaka OM Division-II spent US\$ 0.35 Million because only this amount of budget was allocated and released to this Division. In 1989-90, the same Division spent US\$ 12 Million because this amount was allocated and released in that annum.

similarly the Chittagong Division -I and Division -II spent US\$ 3.92 Million and US\$ 4.85 Million respectively. Cox's Bazar Division-I and Division-II, spent US\$ 4.74 Million and US\$ 4.53 Million respectively. In addition to that a bulk quantity ~~what~~ was utilised in each division for execution of earth work under FFW Programme.

These figures indicate the utilization capacity of a Division. BWDB has 72 such Divisions. Calculated on this basis, the capacity of BWDB exceeds US\$ 800 million per annum. The real scenerio may not be as the simple

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arithmetic indication but definitely much more than US\$ 118 to 166 million, this also suggests that the indicator used by the POE Team to evaluate the utilization capacity is not valid. It further suggests that BWDB is in fact under utilized.

Management of a budget tuned to US\$ 500 Million per annum is not a fantasy for BWDB if all its tremendous store of inhouse capacity is unleashed by providing it with effective leadership, properly planned donor assistance, need based personnel management and timely fund release.

As stated, if an work load of US \$ 500 Million annually comes to BWDB, which seems unlikely with the slow progress of investment programme of FAP projects strengthening of institutional capability of BWDB seems reasonable.

(11) Page 12, Para 1.27

Concerns expressed by the development partners about BWDB's low implementation capacity has been mentioned. From the statement in parenthesis ("though not incorporated by the evidence already presented in Table 1.5), it is obvious that the authors of this report are not sure about the reasons for concern of the development partners.

Though the development partners expressed that BWDB implementation capacity is low, table 1.5 shows that achievement against ADP varies between 90% - 70% which may not be termed as low, if compared with others. It is an important

issue which asks for closer and sharp view of the study team. Irrigation, flood control and water development is one of the most vital sectors for Bangladesh. BWDB is the agency working for this sector. It, no doubt, has many shortcomings. But it has developed and matured over last 25 years through trials and hard work, accumulating tremendous inhouse capacity with network at the real village level. Such a valuable institution should be preserved, developed further to make it more efficient and effective, instead of taking away its jobs distribute among others and cut it into pieces. It seems that influential development partners make stores of BWDB's low capacity and use that as a plea to disintegrate such an important and prestigious institution into small ones. this will be disastrous for the country. The study team should go deep into this issue, address adequately and independent of development partners influence.

It may not be impertinent to mention in this connection that for last three years, BWDB has been subjected to disreputation and public criticism for no fault of its own, but due to problems lying in the MIWDFC on the one hand and too much interference by the MIWDFC into BWDB administration on the other hand. BWDB was created as an autonomous institution to avoid normal bureaucratic processes and delays. The POE Team should go deep into the issue and suggest recommendations on mechanisms so that BWDB can really work with autonomy outside unwarranted interference of the Ministry. The POE Team should

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also recommend for vesting all powers for posting, transfer and promotion of officers upto the rank of Chief Engineer to the Board. POE Team's recommendation for filling the vacant posts are very much appreciated.

(12) Page 12-13, Para 1.28.

12.1 Consultants have quoted the views expressed in a "World Bank Report". Consultants should specifically state whether they share the same views or not.

12.2 Proposal of management improvement of BWDB "by selecting a suitable chairman from a national list of potential candidates (preferably with an engineering background), not confined to the seniority list of BWDB only" is ~~totally~~ unacceptable. Consultants have encouraged formation of own professional cadre for WARPO & RRI and suggested for reconsideration (discouraged) of the system of deputation of BWDB officers (para 5.19) in one hand and advocated deputation (Chairman) from outside to BWDB is contradictory.

We share the same views expressed by the consultants that "long term commitment will motivate them to put in their best and develop the organization" Since BWDB has sufficient capable officers, hence we strongly feel that all sorts of deputation to BWDB (including the posts of Chairman, Member, Secretary etc.) should be stopped as a policy matter.

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Management of BWDB is weak mainly because of interference of Government. We strongly feel that if BWDB is allocated to work as a real Autonomous Body (for which it was created) and interference from Ministry or outside could be avoided the quality as well as the performance of BWDB will significantly improve. Unfortunately 'this report' did not discuss this issue.

As an Autonomous Body, BWDB should be given more financial and Administrative authority. Timely release of Govt. fund is a pre-condition for successful implementation of a project. This issue deserves such attention. Settlement of land acquisition issues is a pre-requisite for early and timely execution of water sector projects. Presently land acquisition is creating a bottleneck for execution of projects.

Several posts of BWDB remain vacant for a long time or manned by officials on "current charge basis" or filled by deputation (even having lower ranks e.g. posts of Chairman by Joint Secretary, Post of Member by Deputy Secretary etc) This creates frustration which has direct bearing on moral of the officials and on the overall performance of the organization. Consultants should have discussed the "Promotion System" as well as the "Deputation Practice" to BWDB.

12.3 We put question mark on the capability and necessity of NGO's in the "construction and management" of schemes.

12.4 Modernization of Accounts and Financial Management System may be done through gradual computerization of project Accounts and not by creating Regional Accounts and pay office. Modernisation of accounts and financial Management system may ensured through modification and improvement of age old, codal rules, decentralization of financial powers and authorities, systematic plan for human-resources development in this sector. Modernisation now-a-days can not thought of without the introduction of information technology in this sector. Negating all these pertinent issues a more centralized accounting system has been proposed through creation of regional pay and accounts office. The idea not only failed to suit the actual need, but it will make the present system slow and inefficient with various complication which has already been experienced many organisation. Modernisation of accounting and financial system should not be considered on a piece-meal rather it should be under taken in a more systematic basis.

(13) Page 13, Para 1.29 7 1.30

This should be the guiding spirit to evaluate the implementation capacity of BWDB.

(14) Page 15, Para 1.33

It has been mentioned that institutions other than DPHE,

DOE, RAJUK, DWASA, DCC will not have significant workload in terms of size of investment. Nevertheless, in terms of Taka, the size of investment for many of the other institutions are quite substantial. So capacity of all relevant institutions need be reviewed for investment as well as the types of works to be undertaken.

(15) Page 16, Para 1.40

It has been concluded that an investment of US\$ 22 Million per annum is not likely to add significantly to the existing work load of the NGO's. Validity of the grounds on which the conclusion is based may not hold good. Because,

- a. When criteria for selection of NGO's for specific programmes will be applied, it will be found that very few NGO's fulfill those criteria. This implies that the US\$ 22 Million per annum will be distributed among only a few NGO's adding significantly to their work load.
- b. Many NGO's, no doubt; are involved in income generation activities with the rural poor in various sectors. But the formulation about NGO's rural bias and their experience in agriculture, fisheries etc. are too rosy. Experience with NGO in Delta Dev. Project and Land Reclamation Project don't testify such compliments for the NGO's. This need to be studied more intensively.

(16) Page 17, Para 1.41

The two factors mentioned in this paragraph are very important. This should be dealt with more emphasis. NGO's are

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being pushed by the development partners. In some cases, NGO's ofcourse, can be useful, but it should be borne in mind that the NGO activities are also sons of this soil with more or less the same basic human characteristics, only with the difference in some motivational training. Report on poor performance of the NGO's are many, but those don't get the publicity. Moreover it has been seen in many BWDB projects that NGO is more loyal to and firm ally of the development partners.

(17) Page 17, Para 1.42

Before assigning any FAP generated project to NGO's their past performance, capability, activity etc, should be critically reviewed. NGO's may not be given status of "Executing Agency" rather they may be given status of consultant/contractor. In such case they should compete (bidding) with other consultants/contractors/NGO's. In the name of open market, liberation or democracy or under pressure from donors NGO's should not be given extra privilege. Before advocating NGO's involvement, peoples attitude towards them should also be taken into consideration.

(18) Page 17, Para 1.43

Question of ignoring Union Council's role in rural development does not arise. Possible preference is to be given to Union Councils over that of NGO's in rural development. By negating the role of the elected local bodies in the rural areas e.g. U.P. for rural development, no sustainable and

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socially acceptable rural development programme can be implemented. Government should Institutionalize the role of UP'S in rural development. NGO'S may at best be given supporting role to the efforts of the UP and other elected local bodies.

(19) Page 18, Para 1.51

Concluding remarks should contain specific recommendations or suggested interventions.

(20) Page 18, Para 1.52

The FAP Projects, for obvious reasons, should go through normal drill of ADP and the normal drill which is time consuming, should be made more efficient and free from superfluous and ineffective bureaucratic processes.

(21) Page 18, Para 1.53

The suggestion put forward in this paragraph is very much appropriate. On closer scrutiny of the indicated 113 projects, may not be found technically feasible, or socially/ environmentally desirable, or financially competitive. In that case, the investment requirement may fall far below US\$ 7.12 billion, or God forbid, the required fund for investment may not be available. In such a situation, the whole exercise on institutional strengthening may become a wastage.

(22) Page 31, Para 2.13

Different areas have some cultural practices, social attitudes and values which are characteristic of the area. It is important to record whether choice of location for particular

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options has any relevance to the sociology of the area. The POE Team may like to address this issue.

(23) Page 31, Para 2.15

The composition of project council and advisory body is quite large. A Superintending Engineer or Project Director with more than one project will find himself extremely busy in formalising things through the project committees and advisory bodies leaving other activities in disarray. Moreover this will increase complications and make implementation delayed. Thus in the name of institutionalisation, length of bureaucratic processing is increasing.

The suggestion of appointing DC as the Chairman of Project Council (PC) follows the old-fashioned civil bureaucratic proposition of heading different committees by the DC at District level, but not conducive to efficient implementation.

When MP's have been proposed to become members of PC, how can DC become the Chairman? We suggest that as a public representative one MP should become the Chairman of PC, DC along with other district level officers of concerned agency/organization will be the members of the committee. Performance of district level co-ordination committee have been criticized by most of the previous studies. Those co-ordination committees were chaired by DC's. Having such failure stories at hand, how can consultants propose that DC's

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should be the Chairman of PC ?

(24) Page 32, Para 2.17

The relevance of issuing notice to DC/TNO by the implementing agency at pre-project consultation stage is not understood, except that it will lengthen the bureaucratic process and that it is out-dated. The composition of PC mentioned in this Para is little different from that mentioned in Para 2.1.5. Reasons of this difference is not explained and understood.

(25) Page 32, Para 2.18

We have strong reservation on the suggestion/proposal that the DC/TNO to become the Chairman of PC at district/Thana level. We recommend that people representative (MP or other elected representative) should be the Chairman at district and Thana levels.

To make PC more effective and sustainable, PC's should be given adequate logistic support with administrative and financial power.

(26) Page 32, Para 2.19

Planning Team, instead of the PC, taking the responsibility of pre-feasibility stage consultation is more pragmatic as well as professional.

(27) Page 32, Para 2.20

It is not understood how PC can interact further with local people during " Detailed Design Stage".

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During the feasibility study stage, intensive participation is required of the people's/beneficiaries, and the envisaged plan should be put before the PC for opinion. The system of approval of a feasibility study report should continue to be as it is now. It should not be put to PC for approval for practical reasons.

At design stage, role of PC is practically nil. People's participation works by requirement, not by definition or rule.

(28) Page 32, para 2.21

The activities of the PC during implementation stage as has been enumerated in this paragraph belong to the implementing agency's routine activity. At this stage, meeting of PC may be useful if there are problems for implementation at local level.

(29) Page 33, Para 2.23 & Page 38, Fig. 3

Peoples representative should be the chairman of PC.

(30) Page 33, Para 2.24

This paragraph tries to establish superiority of the draft guideline of MIWDFC over that of the FPCO. The reason is not understood. To one who has the experience in a project involving people's participation, the guideline of FPCO will appear more professional, pragmatic and efficient than that of the MIWDFC.

(31) Page 34, Para 2.29 and Page 40 & Fig.5

Fig. 5 is not clear enough ; a narrative description of the participatory approach may please be given.

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(32) Page 34, Para 2.30

This para ends with a valuable remark i.e. "there cannot therefore be any fixity or unalterable rigidity in the framework to be adopted". So the question arises "then why the present craze for a framework or institutional arrangement for people's participation"? Framework is at best a tool, but does not ensure people's participation. People's participation can neither be warranted nor be imposed. It evolves through practice depending on the nature and objective of participation, involvement of their interest, commitment, attitude and ability of the actors involved. The POE team should go deep into the issue.

(33) Page 36 Fig 7.

33.1 It appears that the mechanism for peoples participation as presented is still a hypothetical one. How RRA can be shown as responsibility of local people/UP ?

33.2 What would be the relationship between WUA & UP

33.3 The figure should contain a list of abbreviation.

(34) Page 41 - 43, Chapter 3

34.1 It is not understood why management of disaster like cyclone or drought have not been discussed.

34.2 Flood proofing and other non-structural solutions may also include flood/disaster insurance. Institutional arrangement for such insurance may also be discussed.

(35) Page 43, Para 3.5

Too much expectations have been made regarding NGO

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involvements in disaster/relief operations. In the recent past NGO,s failed to come forward effectively to take active role in the disaster/relief operations. The role of Red Cross or Red Crescent Society and some other voluntary & political/social organization are quite appreciable.

(36) Page 44, Para 3.7, & Page 45 - 46, Fig. 6 and 7

The staffing pattern of the DMB gave much emphasis and power to the district and thana administration. But to our opinion emphasis and power should be given to the officials of the Ministry of Disaster Management and Rehabilitation.

District and Thana Relief & Rehabilitation Officers should be the focal points at field level.

(37) Page 45, Fig. 6

District Disaster Management Committee should be chaired by District Relief & Rehabilitation. All other district level officers including DC should be members of the committee. All (field level) relief operations should be conducted through officials of Relief & Rehabilitation Ministry, as such they should be given sufficient authority & power particularly during disaster periods. ?

(38) Chapter 4, Pg.50-62

FAP projects have been proposed to be implemented by several organization of which BWDB is the largest one. It is not understood why co-ordination of BWDB, with other organizations have not been discussed.

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(39) Page 52, Para 4.5

- a. We agree with the observations but these need to be presented with a few important real-life examples.
- b. Planning Commission has been suggested as the appropriate forum for co-ordination between BWDB and RHD. This will not work. Planning Commission is too busy. This co-ordination has to work at the planning stage of any road or bridge between the concerned circles of the two institutions. The POE Team should suggest some sort of institutional arrangement for that.

(40) Page 54, Para 4.6

Consultants have mentioned about canal digging programme of LGED. It would be appreciated if they could also make their observations/comments on the success of the said programme.

(41) Page 54, Para 4.7

- a. POE Team has observed that "LGED is a dynamic and forward looking organisation which is the main reason for its growth".

LGED is a fast growing organisation, more because this sector is given priority and the donors agree to pour and are pouring in money, than for any other reason. Some development partners are publicly pushing LGED as a model institution. The POE Team also seems to join in the chorus. Many others will also like to join. But has the POE Team

evaluated the usefulness of LGED structures, quality of their works, availability of the inhouse expertise, knowledge and experience they need, presence or absence of the phenomenon of rent-seeking in LGED ? If they do, their remark about LGED might be different. There was a time when BWDB (erstwhile EPWAPDA) was considered as dynamic and forward looking organisation. Now it is evaluated the reverse way. God forbid, LGED may also face the same fate after a decade as the BWDB is facing now, for no fault of their (LGED) own.

The POE Team should go deep into these issues and evaluate all the agencies with the same and relevant indicators.

- b. The POE team has mentioned that "LGED initiated the use of Labour Contracting Societies (LCS) which is now adopted by other agencies".

This is not true. The idea of labour contracting societies and its various forms were conceptualised and practiced in BWDB (Land Reclamation Project and Delta Development Project under the Netherlands Assistance Programme) in late 70's and early 80's probably before LGED was created.

- c. Any organisation should be reviewed from the context of its charter of tasks not by its over enthusiastic activities although those may be

appreciated.

- d. The remark of POE shows that preparation of Manual on Land and Water Use Planning, and guidelines on "Environmental Issues" are the commendable efforts of LGED. But these seem to be outside the jurisdiction of LGED and rather snatching away other's work having large scale financial assistance and hiring costly consultants from home abroad.

(42) Page 53 & 54

From this report, it seems that POE wants LGED to have major role in water sector. So far BWDB is only the organization who has carried out many prestigious project with a huge numbers of water resources projects with their well experienced personnel. In comparison with this, LGED becomes a new and very small organization, incapable of handling such large project with their inadequate manpower and resources..

(43) Page 54, Para 4.8

This report should clarify the relation of BWDB with LGED for entrusting some components of Bhola Irrigation Project and secondary towns Protection Projects to LGED.

(44) Page 55, Para 4.11

FAP consultants may establish and maintain contact with BIWTA for their works, but there should be a permanent arrangement for regular co-ordination and review of the hydrographic survey works by BWDB and BIWTA. POE Team may

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suggest institutional arrangement for that.

(45) Page 63-68 Chapter 5

Existing Institutions

While mentioning an institution, the name of the parent organization should also be mentioned, e.g. it should be written as Directorate of surface Water Hydrology-1, BWDB not simply as 'Surface Water Hydrology-1'

(46) Page 63, Para 5.2

The POE Team has mentioned about two issues. There is a third one which is also important, i.e. financing. The POE Team may address this issue.

(47) Page 63, Para 5.3

No doubt, some people may consider posting in Hydrology Directorate as punishment, but this is not the whole picture. There are people who would prefer a posting in Hydrology. This is true for posting in field divisions and planning directorates also. Some like and some dislike. That is not a major issue. Major issue is that Hydrology directorates receive insufficient budget which should be increased.

(48) Page 63, Chapter 5

A big question has been raised to who will be custodian for the continuation of FAP components like FAP 18, FAP-19, FAP 21/22, FAP-24 and FAP-25 BWDB being responsible for formulation, implementation and O&M of projects. responsibility of these components should come to BWDB in a Planned way.

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(49) Page 65, Para 5.6

- a. It is pleasing to know that RRI has enthusiastic professional staff. They are all mostly transferred on deputation from BWDB. It is noted that in one place (RRI/SWMC) the POE Team has found BWDB transferred staff enthusiastic, in another place (Design) they have found that the BWDB staff responds differently. The POE Team should go into the cause of this variation in attitudes and come forward with suggestions of improvement.
- b. The POE Team has rightly raised the issue of leaving RRI out of the activities related with Jamuna Bridge Project and has suggested to take up the matter with the JBP authority. We appreciate this.

(50) Page 65, Para 5.8

Consultants should have mentioned the reasons of low profile of WARPO. The low-profile is perhaps due to changed GOvt. policy. Without creating a new organization i.e. FPCO, the FAP studies have been could logically conducted through WARPO.

(51) Page 66, Para 5.10

In this paragraph, the POE Team has mentioned about inadequate participation of the Hydrology and Design Directorate staff in FAP activities, inadequate contribution of BWDB, as organisation, in the preparation and scrutiny of FAP, indifference to the new technology etc. The presentation in the report has an underlaying tone of accusing BWDB for

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that. If the POE Team investigates deep into the matter and discuss with relevant BWDB officials and review the concerned documents, they will find that (a) BWDB personnel directly or indirectly are at the core of and around the FAP Projects/activities, but (b) BWDB, as organisation, was left out of the group of main actors in FAP activities, may be to reduce the role and importance of BWDB as an organisation, to take the plea of its (BWDB) so called low efficiency or capacity. Before making such swiping comments, consultants should review the situation ;and suggest remedial measures.

(52) Page 66, Para 5.9 to 5.12

It appears that 'transfer of technology' has not taken place up to a desired level. This may be due to the inherent weakness of the training programme. May be the training programmes are good to train BWDB personnel, so that they are able to assist the expatriate consultants in routine job. They are not trained in such a way that they can independently carry out the works. Moreover the working environment of the country is such that, BWDB can not take up a project independently through its own personnel because of Govt. policy, logistic support, funding, donors pressure and institutional arrangement etc. Consultants should have discussed this issue.

(53) Page 66, Para 5.11

It is true that ex-BWDB Engineers and other professionals working in private consulting firms are doing very good and in

fact they keep on-the-job activities of those firms going. Nevertheless that should not be a justification of taking away of jobs of BWDB and giving to private firms, because, still BWDB's in-house capacity of data collection, planning, design and implementation is unique.

(54) Page 66, Para 5.13

The POE Team should not overlook the phenomena of lack of professionalism, rent-seeking, unfair competition in winning an award of consultancy involving even high political functionaries, mushroom growth of consulting firms etc. They should also keep in mind while advocating for private sector involvement, that, provided with proper support and efficient leadership, BWDB can deliver the goods much better than any private sector organisation.

(55) Page 68, Para 5.18

POE proposed to address the re-allocation of duties and responsibilities among BWDB, RRI and WARPO. However, in this respect it is suggested that for closure monitoring of project preparation, implementation and O and M, WARPO and RRI be joint together with BWDB. At a later stage as proposed, RRI may be converted as a Hydraulic Institute.

(56) The report should have a chapter entitled "Conclusion and Recommendation".

(57) Page 65, para 5.5 - 5.7

- a. RRI is not involved in the largest river training work of the country. It is no doubt unfortunate but works of Jamuna Bridge Project is yet to be started as such participation of RRI should be attempted seriously in national interest. Close association of local scientists with Dutch experts will definitely enhance their efficiency and expertise to do similar works in future.
- b. SWMC was a part of the water resources division of MPO/WARPO but due to unknown reasons it has recently been placed under RRI. POE may kindly examine the useful placement of SWMC under WARPO.

(58) Page 67 para 5.14 & 5.16

Formation of SWMC into an independent organization does not seem to be feasible rather its unification with WARPO may be a better idea since creation of several mini Govt. Organization may invite major problems.

(59) Page 112, Para 1

The remark "WARPO does not have any data collecting wing" needs to be clarified.

CONCLUDING REMARKS

1. The issue of efficiency of the Board can not be considered in isolation of the over all national performances and other institutions of the Government. Mostly all the statutory bodies like BWDB are not achieving the desired result for which those were created. In the past BWDB has implemented

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many water sector projects, including prestigious projects like Teesta Barrage Project, CEP, G-K Project, Meghna-Dhonagoda, CIP, KIP, and so on. Thus capability of BWDB as executing agency for FAP generated project is unquestionable. The following amongst other should be considered as vital issues to be addressed to improve management of BWDB.

1. a. Delay in approval process of the project and issues in the Govt.
- b. Delay in land acquisition; difficulty and complexity in land acquisition should be removed. Deputy Commissioners should be made accountable in land acquisition and there should be a time limit on the part of DCs to deliver the land after submission of proposal to him. He should take all responsibilities at all steps in land acquisition process.
- c) The performance suffers for delayed release of fund.
- d) Unnecessary bureaucratic process in the Govt. reduces the performance.
- e) Unnecessary interference and control of the Govt. has made the organization cripple and like a govt department instead of an autonomous body. The interferences are high while the organization is headed by a technical personnel.
- f) Policy for promotion are usually undefined and not performance oriented. Since BWDB in its list has potential candidates for the post of Chairman, a system

is required to select the best candidate. A process also requires to be established to implement the same while candidate is selected from the juniors in the list.

The policy of promotion to the level of Executive Engineers, Superintending Engineers and equivalent positions should be upgraded/modified.

g) Selecting Chairman from a national list of Engineers will pull down the aspiration of the BWDB personnel. The idea will not meet the desired result as the objectives and job of BWDB are complex and specialized in nature. Such idea for BWDB only shall create dissatisfaction and shall not be rational.

h) The Govt. should strictly adhere to the provision of the Statute regarding authority and powers of BWDB. If there is any inadequacy or indistinctness of power and authority, the Govt. should ensure delegation of adequate power and authority for the fulfillment of the objectives of the Statute.

i) The promotion in management and senior positions (Chairman, Members, Chief Engineers) are kept pending months/years together. So efficiency of the organization suffers.

2. The functioning of FPCO, responsible for co-ordinating Flood Action Plan should have more co-ordination with BWDB during study. Remarks on BWDB in FAP-26 report appears to be a product without having dialogue and discussion with BWDB

personnel.

3. It has been concluded to improve BWDB's management by selecting a suitable Chairman from a national list of potential candidates (preferably with engineering background). This prescription appears to be a result of superficial understanding on the present functioning of GOB and BWDB. BWDB cannot be looked as an isolated body. In fact, it now functions as a govt body. In the govt system efficiency and management is totally a product of the government. So it would be injustice to blame a weak leadership of a Chairman.
4. To improve the internal management, the following issues are to be resolved:
 - a. The Board should delegate maximum administrative and financial power to the Chief Engineer, Superintending Engineer and Executive Engineer. In fact Board should retain minimum powers. The Chairman and Members should give time and emphasis to the policy and management matters especially establishment of discipline in the organization by improvement of administrative, financial and technical management.
 - b. The training department should be strengthened with zonal training centres and organizations.
 - c. The appointment, transfer and posting of the accounts personnel should be done by the Board centrally like the other discipline.
 - d. The Engineering Members should be supported with Dy.

C.2

Secretary (Engg.)

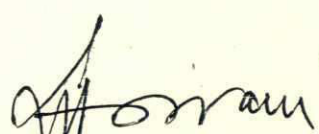
5. Financial and modernization of accounts are needed for satisfactory financial management. It should be effected by training and disciplining the accounts/financial/audit personnel working as the financial advisers in the division, circle and zone/project. No attention was so far given in this respect. SAS equivalent examination remained suspended for about 8 years from 1984 to 1992. This has adversely affected the performance of the account/finance/audit management. They require to be trained to discharge their Codal responsibilities. Modernization of accounts should be thought to the limit of introduction of modern technology in accounting practices. It should be introduced in the present offices and system. Incoherent and sudden change in the system may jeopardize the performance and efficiency of the organization. It may be recalled that the present financial working system has a check and balance.
6. Establishment of improved O&M system is in process. The importance and establishment of O&M system require backing and participation by the policy makers and seniors in the Government and Board.
7. There should be separate quality control circles, division and sub-divisions under each Zone/Project.
8. With the upgrading of contract management practices to international standard we must provide scope to the local contractors in the construction process considering the serious unemployment problem in the country. The enlistment

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rules/procedures requires to be modified. Proper training on international contract management practices are needed prior to its implementation.

9. The role of Monitoring and Evaluation should be strengthened and well defined at all levels. It should be separated from the planning.

10. The Board's Planning should be entrusted with the responsibility of ensuring the feasibility of integration of small scheme into regional planning and development while the approval of scheme is given.

11. Development of peoples institutions in different levels are necessary and should be a pr-condition to the issue of peoples participation.


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30/5/94

