World Bank Response to STAP Reviewer Comments

Sustainability

Under this heading, the STAP reviewer states that “The issue of agriculture and the need for transition to methods that are compatible with high water quality is recognized in the design and there is provision for a [farmer] transition [support] fund. It is not clear how many farmers are likely to be affected either by displacement from the areas being restored or by the need to modify their agriculture practices in lands that affect the restored areas. A small table indicating the approximate number of farmers affected and the main factors needing modification – cropping, nutrient runoff, stock and manure would help to provide a context for judging the scope and scale of the farmer transition [support] fund.”

Annex 2 of the PAD has been revised to include a table on current farming practices in the project area, including a breakdown of arable land. However, it should be noticed that the exact number of farmers that will be affected and the economic activities needing modification by the new restrictions and regulations will be determined during the preparation of the management plan. Moreover, it should be made clear that neither the restoration of wetlands nor the new protected areas regime will require involuntary physical displacement or relocation of people. The only negative impacts on the population that may arise from the project relate to the indirect and unintended impacts on private land from wetland restoration, although this is not expected, and these impacts will be mitigated by the Contingency Relief Fund.

The Farmer Transition Support Fund program will include a menu of possible options that could be supported under the fund, and will be further refined during the first year of project implementation on the basis of the results of the management plan. It is anticipated that additional funds will have to be mobilized in order to target all farmers in the project area that would like to make the transition to economic activities compatible with the new protected areas regime. The project will do so by provide technical assistance to leverage additional financial support for similar activities from other ongoing rural development and environmental programs, i.e., the Special Pre-Accession Program for Agriculture and Rural Development (SAPARD) Program, the State Agriculture Fund, etc.

Under the same heading, the STAP reviewer questioned “the decision to make the Director of the Protected Areas the Chair of the Consultative Committee. This could create a conflict of interest since the CC may wish to study perceived management problems in the protected areas and the Director as Chair would be inhibited in defending the actions of the agency or other members may be inhibited in raising Protected areas issues.”

This comment is well taken, and the PAD has been revised to point out that care should be observed in the final selection of the chairmanship of the Consultative Committee so as to avoid potential conflict of interest situations. The Project Implementation Plan only describes the general functions, recommended representation and chairmanship of the CCs, the specific functions will be listed in the Operational Manual of the CCs.
Involvement of Stakeholders

Under this heading, the STAP reviewer “guard against over-expectations and apply part of the transition funding to facilitate the development of tourism and other alternative activities and training of local people so that they can benefit from an employment opportunities that may come from tourism and recreation.

This suggestions is well taken, and the PAD has been revised to include tourism development and other alternative economic activities and training of local people to benefit from any new employment opportunity arising throughout the project area as part of the menu of options to be supported under the Farmer Transition Support Program.