

Evaluation of the European Commission's Humanitarian Activities in Bangladesh

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Table of Contents

1. LIST OF ACRONYMS	II
2. APPRECIATION	IV
3. EXECUTIVE SUMMARY	5
4. THE DESIGN, CONDUCT AND METHODOLOGY OF THE EVALUATION	14
4.1 GENERAL:.....	14
4.2 FIELD REPORT, WORKSHOP, AND FEEDBACK:.....	15
4.3 METHODOLOGY:.....	15
4.4 DATA COLLECTION - MULTI-CRITERIA AND CROSS CHECKING ANALYSIS:.....	16
4.5 EVALUATION QUESTIONS.....	17
4.6 DIVISION OF TASKS AND RESPONSIBILITIES.....	17
5. EVALUATION QUESTIONS	17
5.1 RESPONSE TO NATURAL DISASTERS.....	17
5.2 DIPECHO/DRR-RELATED ACTIVITIES.....	23
5.3 ROHINGYA CRISIS.....	26
5.4 EFFICIENCY OF RESPONSE.....	30
5.5 ADDITIONAL FINDINGS ON THE INGO/LOCAL NGO/ECHO RELATIONSHIP IN THE CONTEXT OF COORDINATION:.....	32
5.6 ADDITIONAL FINDINGS ON LRRD.....	35
5.7 ADDITIONAL FINDINGS ON FOOD SECURITY & NUTRITION.....	39
5.8 HUMANITARIAN COORDINATION IN BANGLADESH:.....	45
6. CONCLUSIONS AND RECOMMENDATIONS	55
6.1 CONCLUSIONS.....	55
6.1.1 CONCLUSIONS ON DG ECHO’S RESPONSE TO NATURAL DISASTERS.....	55
6.1.2 CONCLUSIONS ON ROHINGYA CRISIS:.....	55
6.1.3 CONCLUSIONS ON LRRD.....	56
6.1.4 CONCLUSIONS ON FOOD SECURITY AND NUTRITION:.....	57
6.1.5 CONCLUSIONS ON HUMANITARIAN COORDINATION.....	58
6.1.6 CONCLUSIONS ON THE INGO/LOCAL NGO/ECHO RELATIONSHIP:.....	58
6.2 RECOMMENDATIONS.....	59
6.2.1 RECOMMENDATIONS ON DG ECHO’S RESPONSE TO NATURAL DISASTERS.....	59
6.2.2 RECOMMENDATIONS ON ECHO’S DIPECHO/DRR-RELATED ACTIVITIES.....	60
6.2.3 RECOMMENDATIONS ON ROHINGYA CRISIS.....	61
6.2.4 RECOMMENDATIONS ON LRRD.....	62
6.2.5 RECOMMENDATIONS ON FOOD SECURITY AND NUTRITION:.....	64
6.2.6 RECOMMENDATIONS ON HUMANITARIAN COORDINATION.....	65

ANNEXES

- ANNEX A: FIELD SCHEDULE AND OVERVIEW OF SITES VISITED IN BANGLADESH
- ANNEX B: LIST OF PERSONS AND SITES VISITED
- ANNEX C: FIELD REPORT
- ANNEX D: PRESENTATION FROM DEBRIEFING IN BANGLADESH
- ANNEX E: TERMS OF REFERENCE

List of Boxes

- BOX 1: CONCERNS FOR ECHO IN INGO/LOCAL NGO/ECHO RELATIONSHIP MIGHT BE:.....58
- BOX 2: ALTERNATIVE CONSIDERATION ON THE ROHINGYA SITUATION.....62

List of Tables

- TABLE 1: FACTS ON NUTRITIONAL SITUATION IN BANGLADESH:.....40

LIST OF DIAGRAMS

- DIGRAM 1: CURRENT HUMANITARIAN COORDINATION STRUCTURE IN BANGLADESH – CLUSTER SYSTEM.....51

1. List of Acronyms

Acronym	Meaning
ACF	Action Contre La Faim
AUP	Aid to Uprooted People
BGB	Border Security Force of Bangladesh
CBO	Community Based Organisation
CCA	Climate Change Adaptation
CCM	Climate Change Mitigation
CDMP	Comprehensive Disaster Management Programme
CED	Chronic Energy Deficiency
CMAM	Community-based Management of Acute Malnutrition
CRA	Community Risk Assessment
CPP	Cyclone Preparedness Programme
DEVCO	European Commission – Directorate General for Development and Cooperation – Europe Aid
DFID	Department for International Development UK
ECHO	European Commission Directorate General for Humanitarian Assistance & Civil Protection
DGHS	Directorate General of Health Services
DIPECHO	Disaster Preparedness section of European Commission Directorate General for Humanitarian Assistance & Civil Protection
DMC	Disaster Management Committee
DRR	Disaster Risk Reduction
EC	European Commission
EQ	Evaluation Question
EU	European Union
EWS	Early Warning System
FAO	Food and Agriculture Organisation
FGD	Focus Group Discussion
FMPU	Food Policy and Monitoring Unit
FSTP	Food Security Thematic Programme
GAM	Global Acute Malnutrition
HCTT	Humanitarian Coordination Task Team
HKI	Helen Keller Institute
HQ	Headquarters
ICRC	International Committee of the Red Cross
IMDMCC	Inter-ministerial Disaster Management Coordination Committee
IPHN	Institute of Public Health and Nutrition
IFS	Instrument for Stability
INGO	International NGO

IO	International Organisations
JC	Judgement Criterion
LDAP	Local Disaster Action Plan
LRP	Local Rights Programme
LRRD	Linking Relief, Rehabilitation and Development
MCM	Mass Casualty Management
MNS	Micro Nutrient Supplementation
MoFDM	Ministry of Food and Disaster Management
MS	Member State
MSF (H)	Médecins Sans Frontières – Holland
NDMC	National Disaster Management Council
NGO	Non-Governmental Organisation
NNP	National Nutrition Programme
OECD	Organisation for Co-operation and Development
OECD/DAC	Organisation for Co-operation and Development Assistance Committee
OTP	Outpatient Treatment Programme
PMO	Prime Minister’s Office
QA	Quality Assurance
RBA	Result-based Approach
RRA/P	Risk Reduction Assessment Plan
RUTF	Ready to Use Therapeutic Food
SAM	Severe Acute Malnutrition
SCI	Save Children International
SFP	Supplementary Feeding Programmes
SOD	Standing Order on Disaster
TFP	Therapeutic Feeding Programmes
UDMC	Union Disaster Management Committee
UNDP	United Nations Development Programme
UNHCR	United Nations High Commissioner for Refugees
UNICEF	United Nations International Children's Emergency Fund
UNISDR	United Nations International Strategy for Disaster Reduction
UNJI	United Nations Joint Initiative
UNO	Union Nirbahi Officer
UP	Union Parishad
USAID	United States Agency for International Development
VGD	Vulnerable Group Development
WASH	Water Sanitation and Health
WFP	World Food Programme

2. Appreciation

The team would like to express their considerable gratitude to everybody who, unhesitatingly, assisted us in this evaluation, with their advice, comments, information, expertise, and physical help. We have tried to list most of you in Annex 2, but we have probably missed some of you, for which we apologise. Some of you, the affected communities, will probably not read this anyway.

We realise that you all helped us to the very best of your ability and so it may be invidious to single any person or organisation out, but, without the help of the DG ECHO office in Bangladesh and their implementing partners, OXFAM, Muslim Aid, WFP, Action Aid, ACF as well as the local NGOs who support them, and many others, the team would have had much more difficulty with logistics and local knowledge. In all the areas that we visited we were, unequivocally, provided support that in some cases went well beyond the call of normal duty. The transport, which involved planes, boats, motorbikes, cars, foot, and some times long hours of travelling, came together with precision and for that we were very appreciative. We are indebted for the briefings and debriefings arranged for us both in Brussels and Dhaka and especially at the project sites on the field mission, as well as all the time that was set aside by individual desks and experts to inform, educate, and alert us to specific issues.

Throughout the field mission, from the Chittagong Hill Tracts to the coast at Cox's Bazar, we encountered nothing but generosity and considerable cooperation. Meetings were very often arranged at short notice, at a time when for many agencies it was extremely busy, in the middle of the monsoon season, when floods were causing havoc but physically illustrating the recurrent hazards and risks that prevail in Bangladesh the difficulties and thus the need for strategies to mitigate the effects – encompassing both global approaches of disaster risk reduction and the more immediate aspects of disaster response.

To all of you – thank you!

Muhammed Taher,

Iqbal Sobhan,

Peter Holdsworth

3. Executive Summary

Humanitarian Situation

1. The humanitarian situation in Bangladesh can be described as a unique and complex one; an ambiguous predicament where both humanitarian responses and development aid are needed, often in parallel. It is characterised by extreme poverty, exacerbated by frequent and repetitive disasters and an increasing occurrence of hydrologic shocks brought on by ecological vulnerability to climate change; aggravated by severe malnutrition; by marginalisation of peoples and side-lining their human rights, and an intractable refugee situation. A significant factor contributing to the marginalisation of parts of the population is the rapacious, unregulated capitalist exploitation – ‘land grabbing’/absentee landlordism/shrimp farming strategies of speculators combined with, allegedly, widespread political and bureaucratic corruption. Apart from the critical life-saving aspects in the immediate aftermath of a sudden onset disaster, longer term assistance is also needed further along the relief/development spectrum to rebuild coping mechanisms and restore livelihoods where the need for urgent humanitarian aid is intertwined with an equally vital need to protect gains achieved in many aspects of development in situations of great fragility. In addition, with the vulnerability of Bangladesh to catastrophic disasters (as recently as 1991 Super Cyclonic Storm BOB 01 killed 138,000 people and caused 1.7 billion dollars of damage leaving 10,000,000 people homeless, and the floods of 1998 left 30,000,000 homeless) the possibility that a massive humanitarian response will be needed always exists. Apart from the urgent life saving aspects in the immediate aftermath of a disaster of any size, however, assistance that is usually required is rebuilding coping mechanisms – the restoration of livelihoods. Thus many of the humanitarian projects of the Commission's partners fall into the category of ‘early recovery’ and thereby follow some of the key principles of humanitarian donorship, especially in providing humanitarian assistance in ways that are supportive of recovery and long-term development, striving to ensure support, where appropriate, to the maintenance and return of sustainable livelihoods and transitions from humanitarian relief to recovery and development activities.

The Continuing Need for Humanitarian Assistance

2. Throughout the field mission the team was reassured and heard the recurrent refrain that *‘the situation was improving’*. This applied to all the issues (with the exception of the condition of the Rohingya Refugees) that the evaluation was asked to examine – from the diminishing number of people affected by acute malnutrition to the stronger efforts made by the government in implementing DRR strategies and better coordination. We were heartened to be told that the level of poverty was reducing; that larger numbers of vulnerable people were finding sustainable livelihoods; that the ‘hunger gap’/‘lean season’ was shorter and not so pronounced; that there were fewer people living in marginal, disaster prone areas; that unregulated capitalist exploitation was also offering work opportunities. This may all be true (the evaluation saw no absolute figures that proved this one way or another) but even if it is and that the numbers of vulnerable population have contracted, there are still several million (approximately 35% of the population¹) who live not just below but **well below** the poverty line, and who, due to recurring debt cycles and lack of livelihood possibilities cannot escape, and who remain without a voice, exposed to extreme human suffering – where shocks in the form of sudden onset disasters can shatter their fragile coping mechanisms, where although

¹ World Bank figures.

there are signs of progress, the outreach capacity and determination of the government in terms of disaster risk reduction is still limited. There is no room, therefore, for complacency and, whilst greater efforts have to be made to achieve stability and sustainable development, the situation for millions of impoverished Bangladeshi still demands at the least humanitarian standby/alertness and in the worst scenario a full-scale humanitarian response. This alone justifies the continued presence of humanitarian agencies and donors capable of providing urgent humanitarian support such as the European Commission.

The Role & Importance of ECHO

3. At the moment the role of ECHO (as the instrument of the Commission that provides support for humanitarian emergencies) in Bangladesh is to provide humanitarian response through its implementing partners, rapidly and flexibly, and sometimes exclusively, providing urgent assistance when needed – and alert to the possibility of a much greater catastrophe. The evaluation found ECHO's humanitarian activities to be effective, within its funding parameters, and **the ECHO team should be commended**. ECHO support is successful because, they have built a wide network of implementing partners linked to the disaster affected community groups at the grassroots, through local and international NGOs and large national programmes (like CDMP funded by the Delegation) implemented by the government and UN agencies. Their knowledge base on poverty and humanitarian issues is founded on strong analytical processes and up to date information.² There is however, potential, for further refinement of aspects of humanitarian support; such as coordination, as discussed in this report – particularly amongst the government, the humanitarian donors, and at local levels; such as an examination of the relationship/role between ECHO/international partners/local NGOs and such as a clearly articulated LRRD strategy or alternative strategy (see below), which would work in long term, chronic emergencies in the cases of malnutrition/food security situation, and the Rohingya Refugees. (The evaluation, however, noted that attempts to develop a LRRD strategy have failed in the case of the Rohingyas in the face of the Government of Bangladesh lack of cooperation, e.g. UNJI).

Prognosis

4. Given the level of poverty and deprivation for most beneficiary groups and their physical isolation, including the marginal social and economic existence, there is always going to be humanitarian concern in Bangladesh, which demands enduring support. The gains so far are impressive enough, but their longer-term sustainability is as uncertain as the vagaries of nature. There have been local level initiatives (e.g., linking with local government institutions and promoting an RBA approach), but without a matching national level policy commitment by the government (and longer term pledges of support from donors), a significant transformation of vulnerable communities does not appear to be possible. Despite strong efforts on the part of donors such as the Commission most of the humanitarian aid that has been provided to affected populations has been a stop gap/'band aid' measure. To truly and sustainably alleviate the humanitarian situation in Bangladesh there have to be more effective measures implemented through the government with the support of long-term maintainable development instruments to reduce poverty; to create livelihood opportunities; provide better health care; create more potable water resources; to eliminate the problems, vitamin deficiencies and malnutrition brought by a single food diet (and monoculture); and continue to improve DRR strategies on a national scale.

² which became clear through different key informant interviews conducted by the evaluation.

5. **None of this excludes the presence of ECHO.** Even if all the development strategies are successful in triggering a major improvement in the humanitarian situation, there are always likely to be spikes in the process, or a major sudden onset disaster requiring an emergency response. Nevertheless, importantly for clearer definition of the work of ECHO, as an instrument of the Commission in the context of Bangladesh, is to balance or refine its role as an emergency donor, where *'the objectives of humanitarian action are to save lives, alleviate suffering and maintain human dignity during and in the aftermath of man-made crises and natural disasters, as well as to prevent and strengthen preparedness for the occurrence of such situations'*. ECHO's role in Bangladesh has to be balanced against the work that other instruments of the Commission, development agencies, and donors are doing for the longer-term stability of Bangladesh. The use of ECHO should not be too much subsumed by development orientated work and yet the emergency response projects, as well as the most important role of saving lives should also try to be complementary to the work of other donors and to the work of the Government of Bangladesh, – to act as a catalyst or a foundation for longer term development instruments. Second, given the huge number of vulnerable population, the Commission's emergency aid has to target and prioritise, through meticulous needs assessments, the very most needy in any humanitarian situation whether chronic or sudden onset.

Key Conclusions and Recommendations

CONCLUSIONS: RESPONSE TO NATURAL DISASTERS:

6. ***Appropriateness – addressing the needs & regaining self-sufficiency:*** ECHO's emergency response programmes have been appropriate in terms of addressing the needs of the affected population both in the immediate aftermath of the disasters and in the medium term. The medium term mitigation has been achieved through ensuring that partners programmes included measures that attempted to restore livelihoods and strengthen resilience, and through the adoption of a 'rights based approach' as well as a 'needs based approach'. The integration of DRR aspects in most of the disaster response projects, such as the raising of foundations of houses, or increasing the height of plinths of wells, also helps to strengthen coping mechanisms. WFP's ECHO funded programme, for example in the Chittagong Hill Tracts not only addressed immediate needs by providing food, but also attempted to restore coping mechanisms by distributing cash. In the short term the ECHO projects positively assisted the affected populations to recover their livelihoods and repair coping mechanisms, but such were the constant encroachments on vulnerable populations (as well as recurring disasters big and small; the predominant poverty exacerbated by unregulated capitalist manipulation and corruption; by monoculture and malnutrition), that donors and implementing agencies would 'always be running just to keep up'. Realistically although ECHO's programmes are vital and should not in any way be devalued, they are still mainly a 'band aid' solution. This should not be seen as a criticism, bearing in mind that a) the emergency response actions of ECHO are primarily intended to provide immediate relief, and yet b) they do integrate measures that mitigate the effects of disasters further down the line.

7. ***Timeliness:*** As far as the 'timeliness' of response was concerned, ECHO, itself, responded extremely quickly when alerted to a disaster, and often pre-empted the response of the mainly development orientated NGOs. ECHO Bangladesh made frequent use of the 'Première Urgence' instrument. Nevertheless, 'timeliness' was sometimes questionable; partly because the Government of Bangladesh was not always prepared to declare emergencies; partly because humanitarian indicators (and inadequate, or uncoordinated needs assessments) failed to recognise the seriousness of the situation (the vulnerable population in

the CHT explain that the situation there has been developing over the last five years – since the blooming of the bamboo, which has knock-on ecological consequences).

8. **Targeting, Coverage and Level of Funding:** Targeting of the affected population was achieved by ECHO's partners by a) realising that they could not cover the whole of the affected population and therefore it was necessary for them to prioritise and b) this was achieved by mapping (the most affected areas geographically) and then narrowing that down through community consultation, with c) enhancement of the targeting through the extended outreach of ECHO's partners, which in some cases was boosted by the extra coverage both geographically and technically provided by the 'Consortium System'. The evaluation found that the level of funding was appropriate, for the specificity of ECHO's coverage. In many cases the evaluation found that the Commission was the only donor providing relief.

DISASTER RISK REDUCTION AND DIPECHO:

9. **DIPECHO/DRR is essential:** Probably of all countries where ECHO operates, Bangladesh is one where DIPECHO programmes are most appropriate. History shows that the issue of disaster is not if it will happen but when and on what scale, (and this is a major concern regarding earthquakes); recurrent disasters are a major constraint to economic growth and therefore long term intervention is needed, which has to be done through the government. The 'bottom up' approaches, however, based on civil society and grassroots communities are cost-effective. This combination of a 'rights based' approach with a 'needs based' approach is effective and the concurrent top down, bottom-up strategy is pragmatic, although gaps occur in the middle, for example at district level. Thus, many strands of DRR in the ECHO strategy are intertwined and enhance the benefits of each other. ECHO has real added value with the INGOs/national NGOs and DIPECHO pilot approach, if taken up by long-term programmes such as CDMP. Despite the improvement of the government's approach to DRR very much still needs to be developed and the government does not have the outreach to implement DRR in all the areas where it is needed. Even in the capital, Dhaka, much of the vulnerable population is without adequate DRR measures, and without the DIPECHO programmes many parts of the vulnerable population would remain exposed.

10. **Reinforcing capacities:** ECHO's 'twin pronged' strategy towards DRR (although even within this there are multiple approaches) has contributed to reinforcing sub-national response capacities, including preparation and awareness of local communities. There is evidence that the DIPECHO approach has concrete benefits, as illustrated in the recent floods in the Cox's Bazar region, where the DIPECHO supported communities, when responding to a flood alert showed that they were much better prepared than some of the neighbouring communities who had not received any support. This is only a small example, however, and it will not be possible to measure the benefits until there is another major disaster. As explained in the paragraph below, however, even communities who are not supported are well aware of the need for DRR, but they do not always have the financial means to implement the measures.

11. **Replication/Multiplier Effect:** The boosting of local level capacity has percolated upwards in a limited way to national level through the auspices of such programmes as CDMP. Nevertheless, although most of the people, both local government and affected populations to whom the evaluation spoke, were well aware of the need for DRR, replication in concrete terms was limited, simply because in situations of extreme poverty they did not have adequate means to carry out such activities as raising the plinth levels of their houses without external financial assistance. If faced by the choice of using their money to buy food, pay for education or health care against paying for DRR measures, then the food, children's

health or education etc. is always going to win. The same applies with local government, who will always tell you that first, they don't have a budget and second, what budget they do have is always used up for more urgent issues. Perhaps because of this and the depth of poverty in the country the multiplier effects, or replication of the programmes were not much in evidence (see example 1). The 'rights-based approach', however, used by DIPECHO does increase the awareness of communities and although it is not possible to measure the multiplier effects of this 'software' aspect of the programme it undoubtedly does spread through communities and is vital. In the respect of replication, also the benefits of the Consortium System, introduced by DIPECHO, with the much greater outreach that a consortium has, will a) benefit the replication by producing a standard 'package', and b) extend to many more communities.

ROHINGYA REFUGEES:

12. ***Vital Support:*** DG ECHO-funded activities have delivered vital humanitarian assistance to the most vulnerable Rohingya Refugees in the makeshift camps of Kutupalong and Leda – approximately 40,000 or 16% of the Rohingya Refugees population, if the UNHCR estimated number of Rohingya Refugees, 250,000, living unofficially in Bangladesh is correct. The Commission, through ECHO, is the only donor providing assistance to these unregistered refugees and what DG ECHO is doing complements the support that is provided by the Delegation, through the IfS, for the registered Rohingya Refugees assisted by UNHCR in the official camps – a good example of how different instruments of the Commission can work in a structured way. UNHCR considers that without this assistance the circumstances of the Rohingya, already dire, would be far worse, and so the DG ECHO funded activities go beyond delivering an appropriate level of humanitarian aid... they are absolutely vital. Nevertheless, the level of assistance is minimal, and alone would not be sufficient to survive on; WFP and ECHO's implementing partners are not, for example, allowed to provide food to the refugees in the makeshift camps. What the assistance does provide is, importantly, shelter, WASH, medical care, and a fragile degree of protection, which only exists for as long as international NGOs are present. The Commission is not only '**humanely**' correct to address this crisis but the strategic approach is also realistic and it should be continued. The evaluation also commends ECHO for many of the positive initiatives that it has taken in respect of the Rohingya Refugees. The problem, in the future, for the Commission, as an emergency donor, is that the Rohingya Refugees not only require immediate assistance from ECHO, but will also require aid well into the distant future and whilst ECHO has the expertise and knowledge to deal with chronic humanitarian refugee situations, (ECHO has been or is involved in funding many long term refugee/IDP situations – e.g. Tanzanian refugee camps, S. Sudan, Ethiopia/Eritrea, Darfur, Angola) its funding mechanisms do not lend themselves to long-term programmes.

13. ***Protection and Advocacy:*** It is with regard to 'protection' that the advocacy efforts of the Commission are so important. The evaluation could not categorically state that the advocacy efforts of the Commission have been successful in reinforcing the conditions of life for the Rohingya Refugees, and UNHCR stated that they were making no headway in this largely ignored humanitarian situation, but most importantly these efforts have contributed to maintaining the 'status quo' and the presence of a major donor and international NGOs has undoubtedly prevented a deterioration in the level of 'protection' (although see alternative consideration of UNHCR). This appears to be a negative conclusion but the advocacy should be considered as an essential strategy and should not be abandoned. One reason, for example, why MSF/H appreciates receiving funding from the Commission is because they consider

them to be a powerful and neutral donor whose advocacy the Government of Bangladesh cannot ultimately ignore and which will have an impact on other donors.

OVERARCHING ISSUES:

14. All three of the issues that the evaluation was asked to examine also had overarching themes impacting on them, which included the aspects of 1) ‘LRRD’, 2) ‘malnutrition’, and 3) ‘humanitarian coordination’, all of which affected the condition of humanitarian support and all of which ECHO were actively engaged in.

15. ***Conducive to LRRD?*** In all of the contexts in Bangladesh, in which ECHO is engaged, LRRD becomes very important and, whilst ECHO does not have a widely publicised strategy, there has been much discussion on the process between themselves and the Delegation. ECHO and the Delegation have recognised the need to coordinate the use of various instruments (IfS, FSTP, AUP and CDMP) for the long-term chronic crises that they face – the cyclical, repetitive natural disasters, the intractability of the Rohingya Refugee crisis, and the overwhelming problem of under-nutrition. An LRRD strategy has often been seen as necessary not only for working in a transition situation but also for tackling long-term chronic emergencies, but the evaluation considered that given the limitations that a situation such as that of the Rohingya Refugees appears to impose on a neat dovetailing of emergency instruments such as ECHO and longer term development instruments, it may have to be accepted that refugee crises, in particular, cannot be thought of as humanitarian situations that can be resolved through implementing an LRRD strategy. It is necessary to accept that they are what they are – a long-term chronic humanitarian emergency – and for that a humanitarian donor needs to develop a longer-term outlook with the budgeting mechanisms to match, budgeting mechanisms that can both secure funds for the longer-term and, concurrently, have the flexibility to address an ever evolving, protracted, humanitarian situation, whilst the Commission as a whole has to avoid the compartmentalisation of its’ instruments.

16. ***Under-nutrition, Malnutrition:*** Another all-encompassing issue that lurks menacingly in the background of all the humanitarian situations faced by the vulnerable population of Bangladesh is malnutrition – to the extent that by itself, without any other humanitarian causes it is reaching emergency levels. The evaluation found that ECHO was fully cognisant of the problem – describing ‘it as a huge problem at the crossroad of emergency and development’. The evaluation also found that ECHO, has largely included nutrition interventions as a component in response to a disaster. The pervasive nature of malnutrition and the degree of severe acute malnutrition in Bangladesh as well as stunting and under-weight, however, provide a strong rationale for addressing it through direct and substantive measures in and of itself. The incidence of wasting, often referred to as a silent emergency in Bangladesh are at levels, if measured against WHO indicators, which warrant emergency interventions. For ECHO, once again, the problem lies in the fact that it is an overwhelmingly large problem that cannot be resolved in the short term by a single donor and would therefore require ECHO to prioritise rigorously and decide very carefully on entry and exit strategies.

17. ***Humanitarian Coordination:*** The evaluation found that humanitarian coordination was improving in Bangladesh both with the humanitarian agencies themselves and with the government; that the introduction of the ‘cluster’ system, the active work of ECHO both in coordinating its own partners during emergencies and in promoting the coordination work of the UN, and the NGOs was contributing to a more coherent system. An early illustration of

the positive progress has been shown in the response to the recent flooding that occurred shortly before the arrival of the evaluation team, in the aftermath of the severe flooding in the South East of the country when it was necessary to assess the humanitarian situation. **In this case only one assessment was conducted in which 58 NGOs and aid agencies** were represented together with the government – the findings of which assessment were generally accepted by all the aid agencies and the government. Despite the improvements it was not clear that the improving coordination was sufficiently well adapted to a sudden onset disaster – the focus of humanitarian coordination was a) (importantly) improving coordination with government bodies, and b) was tailored to a largely development outlook.

18. ***Benefits to Coordination from Community Participation:*** In many of ECHO's projects the systems adopted by ECHO partners, for involving local community, schools, CBOs, officials, disabled, elderly gives ownership to the particular process and with that more involved coordination, making it sustainable for the future and producing a more effective network on the ground in the event of a major emergency. By involving the community, coordination is also improved because the community participation tends to spur on the actions of the disaster management committees (DMC). In addition such a system helps to ensure that some of the most vulnerable such as the elderly and handicapped are not overlooked when support is needed. The evaluation team observed through its long discussions (FGDs) with many different community groups, both on the hills and plains, that there were certain coordination principles all the groups adhered to, which would last for many months and years to come.

19. The spirit of togetherness to resolve developmental problems built over many years of community development efforts undertaken by NGOs has ensured that it is not solely the material deprivation that people are concerned by or even most anxious about. They have now learned to cast a distant view on their future, for themselves, as well as for their children. That is why we now observe more disciplined distribution of relief assistance, more focus on children's health and education, prioritising assistance for disabled and aged people, expressing concern about environmental degradation by capitalist speculators and focusing on preservation of natural resources.

20. ***The Consortium System:*** Systems such as the 'Consortium System', introduced by DIPECHO, had many positive benefits for effective coordination and greatly reduced the management commitments of ECHO Bangladesh, having a central focus point in the lead agency of the consortium. The concerns of the evaluation revolved around the endemic systems developed for Bangladesh, which have been evolved with a development focus, including the cluster system, and whether in the event of a sudden onset disaster these systems can adapt themselves to a high-powered humanitarian emergency response. For example, the consortium system, is effective for managing several agencies engaged in a single project, but group agreement is generally required and this can take up to two months. In an emergency this would slow down the response considerably. In addition some important elements of the government who would be primary players in an emergency appear to be disengaged from coordination with the humanitarians. This especially applies to the military, which would in any national disaster be a primary responder.

21. ***Efficiency:*** The evaluation considered that the interventions of ECHO and most of its implementing partners were efficient in the context of the intervention, in the implementation of the response, and on the choice of partner. The evaluation was impressed with the 'consortium' system in the context of Bangladesh, although as mentioned in the paragraph

above on coordination it is not clear how efficient the system would be in the initial stages of an emergency, with question marks on how rapidly a consortium would be able to make decisions.

22. ECHO Relationship with its Partners: An element that undoubtedly enhances efficiency is the relationship that ECHO has with its implementing partners, and the evaluation found this to be very good. None of the many partners that the evaluation spoke to had anything but favourable comment for ECHO, although perhaps to some of the local NGOs ECHO's relationship was more distant – conducted through the INGO. Interestingly, none of the partners complained about slowness of funding, quite the reverse – most were pleased with the speed with which ECHO provided funding once they had decided to commit themselves to an emergency. ECHO was held up as an example for its coordination activities during humanitarian emergencies, although it was also felt that coordination, inevitably, became ECHO centric. The only open questions on efficiency that are left are 1) whether ECHO's implementing partners, who are most effective in early recovery and development programmes retain the capacity for emergency response, and 2) that of the use of local NGOs by INGOs and here the question is one of cost-effectiveness for ECHO, when the agencies that they are paying to do the work, are in fact sub-contracting or 'partnering' local NGOs – a question of additional overheads, and an ethical question as to whether the local NGOs have the same approach to humanitarian aid, are impartial and neutral or are free of pressures. (More detail on this can be found at section 2.8). There are, however, probably unseen cost benefits derived from the fact that many of ECHO's implementing partners are engaged in development projects that are not funded by ECHO but they are probably able to synchronise these projects with the early recovery projects that they implement for ECHO and thus achieve cost-efficiency and a form of LRRD. This, however, would require further evaluation.

RECOMMENDATIONS:

23. In Bangladesh ECHO's emergency response programmes are essential because of the vulnerability of the country to disasters and because the resilience of the vulnerable population is weakened by poverty and malnutrition. The Commission, through the services of ECHO, has the flexibility to respond to crises big or small. Their disaster response has been appropriate, and life saving both in the short term and in the medium term, as well as being innovative and well thought out. ECHO's presence should be maintained in Bangladesh in order to fulfil what is their primary role – emergency response – in a country that is very often going to need it.

Timeframe: Already underway, Priority: Vital.

24. ECHO should be alert to potentially bigger disasters, requiring a major humanitarian operation, (which would probably involve international support on a massive scale) whilst maintaining their presence to respond to the cyclical disasters that occur. Many experts consider that a major disaster goes beyond 'potentially happening' but is imminent. Whilst ECHO Bangladesh cannot expect to have a 'sitting'/reserve budget for this eventuality, there are some measures that they can take in advance of any major emergency. They should continue their support for improving disaster response coordination mechanisms, including the 'cluster' system, amongst the humanitarians, and to encourage continuing improvement in coordination between the government and the humanitarians, through, for example CDMP, **including the military**. They should also ensure that their implementing partners, who are mostly focussed on development activities, genuinely do have and are able to maintain the

capacity to respond to emergencies. This also applies to the use of the consortium system and to the working relationship between INGOs and their local NGO partners.

Timeframe: Short, Priority: High

25. **The DRR programmes should be maintained** both as part of the DIPECHO regional programme and as an integral part of disaster response programmes, as they are currently. Their added value, over and above the support that they provide to improve the resilience of the vulnerable populations, is that they also contribute an important element towards LRRD. The two-pronged strategy should be maintained – specific DIPECHO projects and mainstreaming DRR within ECHO disaster response projects. The combination of a ‘rights based’ approach together with the provision of material assistance is a suitable balance, although it will take more time before it can be concluded that the ‘rights based’ community involvement strategy is sustained when the NGOs have departed. The consortia appear to be an appropriate system for implementing these programmes and should be continued, but it should be ensured that they are still a suitable mechanism for responding to sudden onset emergencies, where quick responses may be delayed by the fact that all the members of a consortium have to agree.

Timeframe: Short, Priority: Medium

26. **Replication/multiplier effects:** One purpose of ECHO’s DRR projects is to encourage replication. This objective should continue to be strived for, but it should not be expected that in terms of material replication, i.e. raising the foundations of houses, there is going to be very much without financial support, whilst poverty predominates, where land tenure is uncertain, and where the limited resources of a family are more likely to be spent on the smallest essentials to sustain life. Replication should focus on the ‘software’ aspects of the DRR programmes such as the awareness raising that is done in schools and communities. To effectively measure the impact of DIPECHO programmes and replication/multiplier effects, it is recommended that the Commission specifically evaluates the impact of DIPECHO projects over a long period and wide geographical areas, but to do so would require that valid comparisons are made, i.e. much time would need to be spent measuring the benefits for assisted communities over a long period, against the neighbouring communities. (It is understood that a DIPECHO-specific evaluation is underway.)

Timeframe: Long, Priority: Medium.

27. **Rohingya Refugees Humanitarian Imperative:** It may not be appropriate to think of the Rohingya Refugee crisis in the context of LRRD but, rather, as an isolated chronic long-term emergency. Therefore, although it has probably been recommended many times in the past, the Commission should consider whether DG ECHO should possess longer term funding mechanisms for use in these situations. Concurrently ECHO’s implementing partners also need to be able to develop a longer-term but flexible strategy rather than merely to expect repeat funding for projects that combine addressing immediate needs with little towards sustainability (vital, though, providing for these needs may be).

Timeframe: Medium, Priority: Medium – but an issue which has been discussed already for many years.

28. **Advocacy:** Although the advocacy efforts made by DG ECHO in combination with the Delegation seem to have made little difference to the situation of the Rohingya Refugees, they should not be abandoned. There is little doubt that the case of the Rohingya Refugees is a gross abuse of human rights and should be highlighted as such. The only way in which this can be done is through constant advocacy. It is not sufficient, however, as emphasised by

UNHCR to conduct advocacy aimed at the Government of Bangladesh in isolation. This grave humanitarian issue and gross side-lining of human rights starts with the government of Myanmar and has become a regional issue. Advocacy efforts have to be focussed accordingly. It is recommended that ECHO should also retain close links with UNHCR concerning alternative strategies.

Timeframe: Constant, Priority: High. (Part 3.1.9.)

29. **The role of local NGOs and INGOs:** ECHO should examine the increasing role that **local** NGOs play, (undoubtedly an essential role), how much they add to the efficiency of the operations, what the additional costs might be, and, **most importantly**, what the value added of the INGOs is, whether the local NGOs are bound by the same ethics, principles etc, and whether the degree of monitoring and mentoring for local NGOs from the INGOs is adequate, (the current ECHO evaluation of LNGOs found in Bangladesh that in the case of one major INGO, **only 2 expatriates were working with 83 local NGOs and 500 unfunded ones**) what the guidelines are for this and for the contracting of local NGOs, whether these are fulfilled and whether there are parameters on ‘capacity building’ or whether what constitutes ‘capacity building’ is decided by the INGO. It would also be useful, although difficult to achieve without a major audit, to have a cost analysis of what ECHO funds the INGOs and how much is paid to Local NGOs. It is understood that such an evaluation is underway, although it probably does not include the cost analysis.

Timeframe: Already underway, Priority: High.

30. **Food Assistance/Nutrition:** ECHO’s current strategy towards under-nutrition should continue with an added emphasis on rigorous prioritisation and careful decisions on entry and exit strategies. This should be achieved by devising appropriate indicators to signal the beginning and end of their involvement. Such indicators need not necessarily all be technical indicators although those are important but should include other indicators such as the capacity of the government to take responsibility, the willingness of other donors to provide sustainable support, or other instruments of the Commission to implement long-term sustainable measures through such mechanisms as the FSTP and other instruments of the Commission.

Timeframe: Medium, Priority: High.

4. The Design, Conduct and Methodology of the Evaluation

4.1 General:

31. The methodology adopted for the evaluation followed a sequential pattern, which commenced with an inception meeting in Brussels that provided an opportunity to discuss the evaluation on the basis of the proposal submitted by the company during the bidding period. In addition to gathering information and documentation from relevant people, this provided an opportunity to review the evaluation questions and judgement criteria applied to each of them, which formed the basis of this evaluation. For evaluating the interventions themselves, the major focus was on gathering information on the dominant themes and respond to the questions defined in the ToRs. They include the overall benefit to the affected population; second, risk reduction through poverty alleviation in the effort to insulate participants from the effects of the disaster; and third, that the projects, in addition, concentrate on the ‘bottom-up’ community based approach.

32. **Overarching Issues:**

As emphasised at the inception meeting, a clear focus was kept on the overarching issues that embrace all these themes. These included the need to evaluate the Commission's programmes not merely to assess the impact of past work but with a view to providing a platform for future strategy; for example in view of the chronic and repetitive nature or intractability of the crises but with the continuing need for humanitarian aid, whether a) ECHO should be robustly engaged in a strategy to hand over to longer term development agencies – 'Transition'/LRRD, b) the humanitarian imperative and 'forgotten crisis' nature of some of the crises, the grave situation with malnutrition, or c) whether humanitarian assistance in Bangladesh has to be viewed as a constant need which will take place alongside rehabilitation and development, rather than a linear process – i.e. *Crisis → Emergency Response → Relief → Rehabilitation → Development etc.*

33. The inception meeting culminated in an inception note and a subsequent desk report, which allowed a thorough review of available documentation and interviews with relevant people particularly a detailed review and refinement of evaluation questions and judgement criteria used. The field mission that visited the country over a period of three weeks covered a range of emergency interventions supported by ECHO emergencies including floods, tidal flooding, water logging, rodent infestation and the refugee situation and a diversity of geographical areas.

4.2 Field Report, Workshop, and Feedback:

34. Observations from the field trip were presented in a Field Report, which outlined the operational matters relating to the field visits. Prior to its departure from the field, the mission held a workshop with implementation partners and representatives of ECHO, where the mission's provisional findings were discussed with partner NGOs and implementing organisations (IOs). The purpose of the workshop was to allow the NGOs and IOs to comment on the initial findings of the evaluation, promote dialogue, mutual learning and ownership. The final stage included assimilating, collating, and rationalising the information gathered and synthesising them within a coherent framework to provide conclusions and recommendations in the draft full report of the mission.

4.3 Methodology:

35. Overall the evaluation was dictated by the use of three complementary methods of analysis: (i) analysis of available documentation; (ii) interviewing of stakeholders (e.g. direct beneficiaries and key implementing partners) and others whose programmes or strategies may have an impact on ECHO's work in Bangladesh, and (iii) undertaking visits to a sample of project areas covering a diverse range of support provided by ECHO. These three methods also served to triangulate information gathered.

36. All three elements of this methodology were channelled towards answering the evaluation questions defined in the ToRs and took into account the full set of Evaluation Questions and Judgement Criteria outlined in the Annex C Field Report.

- (i) **Documentation Analysis:** The team reviewed a comprehensive list of all documentation relating to the projects including relevant Financing Agreements, covering annual global decisions implementing partners project submissions, logical framework matrices; work plans; annual reports and interim reports; external monitoring mission's reports, and external audit reports. This also included reviewing relevant documents produced by partners, other donors or

international agencies where possible, and most importantly government disaster preparedness and disaster risk reduction strategies and relevant statistical data.

(ii) Interviewing stakeholders: Interviews with stakeholders covered four different groups:

- **The project final beneficiaries** (refugees and affected populations from disaster prone areas) for obtaining information on effectiveness, efficiency, impact and sustainability, and where possible affected populations who do not necessarily benefit from ECHO projects – in order to make comparisons and put into context the ECHO programmes.
- **Decision makers** for gathering opinions on the relevance and the coherence of the project and for understanding what may be the most effective future strategies, these included decision makers both at the local levels and at the national level
- **Implementing and/or associate partners** for assembling information on connectedness effectiveness & sustainability issues; community based organisations
- **Project managers and staff** for getting opinions on operational issues (efficiency and coverage).

(iii) Field Visits to Project Areas: Field missions were undertaken to a sample of interventions, which reflect the dominant themes of EC involvement in the country, including refugee camps. These are listed in Annex B of this document. The choice was based on geographical diversity as much as intervention variety, dictated by the time available and physical constraints, including security, access. The areas covered included the southern coastal and south central region (subject to cyclones, floods and reflecting the need for emergency assistance), and the south-eastern part of the country (refugee camps) including ethnic population groups living in remote hill tracts threatened by malnutrition and food insecurity.

37. The object of the field visits was to obtain a first hand experience of the geographical and social context by (travelling long hours) visiting remote project sites, interview beneficiaries and other affected populations, local communities, and project implementers. During the visits the evaluation observed and gathered opinions on the effectiveness and sustainability issues of the project, and project impact i.e. whether their conditions have been improved or disaster preparedness has been enhanced whether there are multiplier effects from ECHO's programmes, whether other instruments of the Commission have used the ECHO programmes as a foundation to launch some of their development assistance.

4.4 Data Collection - Multi-criteria and Cross Checking analysis:

38. Data collection tools that have been applied in the assessment include document study, interviews and visual examination through field visits. It included crosschecking results from different methods: referring to the process of triangulating, matching and comparing information collected from different sources (from documents, from interviews and/or from stakeholders) in order to confirm its validity. The main object of crosschecking was to spot contradictions between information sources. A further analysis of the degree of reliability of these information sources in order to validate the most objective conclusion was carried out.

39. As an example: from the desk study (reading reports and meeting with UNHCR) it was clear that the situation with Rohingya Refugees although a potentially disastrous humanitarian situation if neglected, is also quite an intractable situation that could not be solved in Bangladesh in isolation, but has to be examined in the larger context of these refugees (often described as ‘the Palestinians of Asia’) who have also migrated as far away as Saudi Arabia, Malaysia, Thailand, Indonesia and Australia. This, therefore, is not only a political issue but a regional one on a long-term scale as well, and for ECHO therefore, an emergency response donor, it has to be examined in the context of LRRD/Transition.

4.5 Evaluation Questions

40. Against the broad concepts of lesson learning and accountability with a view towards improving performance, the evaluation assessed the appropriateness and effectiveness of the Commission’s actions in accordance with the ECHO’s mandate. The evaluation was based on the application of a set of evaluation questions along with Judgement Criteria (JCs) and Indicators which were developed by the team and answered to the extent possible based on the study of currently available documentation further verified by on-site inspection and discussions with relevant people. Although not framed as specific questions they are aimed at identifying the main factors that have affected the relevance, efficiency and effectiveness of DG ECHO’s actions.

4.6 Division of Tasks and Responsibilities

41. The team leader had the overall responsibility for the quality of deliverables and together with the AGEV evaluation management team, which put special emphasis on coordination, presentation, formal editing and adequate incorporation of comments. The team leader, together with the international team member, worked on the design of the evaluation and documentation study during the desk phase. The national team member supported the team during the preparation and implementation of the field visit. This was seen as the best approach whereby the team benefited from understanding the interaction between the various national and international agencies, both Government and non-Government. The TL also contextualised the various findings of the team as a whole. Throughout the whole evaluation process, the team cooperated closely on identifying critical sources of information, formulating a clear understanding of the historical data, analysing findings, identifying options and deriving conclusions and recommendations. While jointly responsible for the formulation of the report, the responsibility for finalisation of the report was the overall responsibility of the team leader.

5. Evaluation Questions

5.1 Response to natural disasters

42. **Evaluation Questions:**

To what extent was the response appropriate in terms of

- *Addressing needs of the affected population in a timely manner?*
- *Coverage of affected population, including an estimate of affected population covered by DG ECHO intervention, in total and as a percentage of the total affected population?*
- *Level of funding?*

How effective was the response in helping people meet their basic needs and regain a minimum of self-sufficiency?

To what extent conditions were conducive for an effective LRRD? What were the main challenges/achievements?

43. **Work done by the Evaluation Team during Field Mission:**

As well as the work done during the ‘desk study’ phase of the evaluation, to evaluate the ECHO response to natural disasters in Bangladesh, the evaluation team conducted the following activities during the field mission:

- 1/. Meetings with ECHO Bangladesh and the Head of the EU Delegation,
- 2/. Meetings with implementing partners engaged in disaster response both in the field and in Dhaka;
- 3/. Field visits to current disaster response projects (e.g. Chittagong Hill Tracts) and to areas previously affected by disasters.
- 4/. Meetings in sites with beneficiaries, focus groups, CBOs, government officials – local, district, and national.

44. **Main Points:**

- ◆ ***Bangladesh is highly susceptible to disasters*** – always a potential need for emergency humanitarian response.
- ◆ ***The most marginalised are often the most vulnerable*** in any disaster in Bangladesh – there is a regrettable correlation between those most affected by disasters and poverty
- ◆ ***ECHO has been highly active in disaster response*** for emergencies both big and small (and although the so-called ‘small’ disasters may be small in scale they can be catastrophic to the actual people affected),
- ◆ ***ECHO response has been timely***, often using the Première Urgence instrument, appropriate, and well considered. The combinations of Cash and Food, Cash for Work, Cash for Training have been appropriate and satisfactory for the beneficiaries and in some respects leads to much more straightforward interventions.
- ◆ ***Cash and food balance*** in Chittagong Hill Tracts appeared to work well and contributed to a more effective approach.

45. **Background:**

Bangladesh is a country with the densest population in the world, where, despite progress, poverty weakens the lives of 31% of the population; where the health of most of the population is fragile; and where, although much of the population depends on subsistence farming, a large percentage of the rural population has only achieved a level of ‘migrant labour’ and is unable to rise above this vulnerable condition. The poverty levels, monoculture farming practices and single food diet (almost exclusively rice) combined with the lack of healthcare from the government (the total expenditure on healthcare as a percentage of their

GDP was only 3.35% in 2009)³, have also contributed to the persistent and overwhelming complications of malnutrition. ACF, UNICEF, and the World Bank estimate that Bangladesh has amongst the highest rate of U5s suffering from malnutrition – moderate to severe malnutrition affects 46% of children and 26% of the overall population are undernourished.

46. Bangladesh straddles the low-lying Ganges-Brahmaputra delta, which has created some of the most productive plains in the world, but it also means that most of the land mass of Bangladesh is less than 12 metres above sea level, leaving Bangladesh particularly exposed to chronic flooding. It is estimated that approximately 10% of the country would be flooded if the sea level were to rise by 1 metre creating the possibility of 20 million ‘climate change refugees’. Bangladesh is also subject to annual monsoon floods and cyclones as well as being potentially exposed to cyclonic induced super floods, earthquakes, which given the density of population and the high concentration of urban building could have catastrophic consequences. Nevertheless, Bangladesh is listed among the ‘*Next Eleven Economies*’⁴, and in 2010 the United Nations acclaimed Bangladesh ‘*for achieving tremendous progress in human development*’ although it continues to face a number of major challenges, which will have an impact on the humanitarian situation of the country and on its further development.

47. Combined with the fragility of the population, exacerbated by poverty, there is, therefore, always likely to be a need for humanitarian emergency response. Between 1980 and 2010, the country suffered from a total of some 234 natural disasters of different types⁵. In the context of people affected, of the top 10 disasters during the period, 8 were due to floods.

48. A large portion of the Commission's humanitarian funding for Bangladesh has been used for one of ECHO's core mandates – ‘emergency response’, contributing €53 million in humanitarian aid for the victims of Cyclones SIDR and AILA since 2007 and over €29 million for flood victims since 2004 and for other victims of disasters such as the recent rodent infestation in Chittagong Hill Tracts.

49. It is inevitable that in Bangladesh some of the most vulnerable population are the marginalised poor. Because of their situation they find themselves forced to live in peripheral coastal areas or low lying land in river basins, which are extremely exposed to cyclones, high winds, tidal waves, and consequent flooding, or trying to earn livings through the cultivation of ever shifting river basin land. With an estimated 30% of the population living below the poverty line there are always millions who are liable to become victims who will need humanitarian aid. It was clear from the field visits that ECHO, through the programmes of its implementing partners has tried to target the very worst affected communities who a) have considerably diminished coping mechanisms and b) do not have adequate access to the limited services that the national government provides.

³ World Bank report published in 2010.

⁴ The **Next Eleven (N-11)** are the eleven countries — Bangladesh, Egypt, Indonesia, Iran, Mexico, Nigeria, Pakistan, Phillipines, Turkey, S. Korea, and Vietnam.—identified by Goldman Sachs and economist Jim O’Neill in a research paper as having a high potential of becoming, along with the BRICs, the world's largest economies in the 21st century. The bank chose these states for their promising outlooks for investment and future growth.

(In economics, **BRIC** is a grouping acronym that refers to the countries of Brazil, Russia, India, and China, which are all reckoned to be at a similar stage of newly advanced economic development.

⁵ ‘Disaster Risk Reduction as Development’, UNDP Bangladesh; "EM-DAT: The OFDA/CRED International Disaster Database, University Catholique de Louvain, Brussels, Belgium".

50. **ECHO Response:**

ECHO's response has covered a wide range of natural disasters in Bangladesh from the very large to the very localised. This has included responding to the impact of floods as a consequence of abnormal localised rainfall (as in the case of the Chittagong Hill Tracts in 2011) or from increased river flows from across the borders. These floods have been of such regularity that the concept of 'living with the floods' has gained a degree of currency.

51. In addition to floods, storms, cyclones and tidal surges that move in from the Bay of Bengal have also occurred with regularity and have had a great impact in terms of lives lost and damages caused. The damage to physical infrastructure such as embankments, roads and canals have an enduring impact in that repairs and rehabilitation take longer, as can be physically seen from the recent tropical storms AILA and SIDR which hit the coastal areas of the country in the recent past. Negative fallout of the rapid, but unplanned, development in the rural secondary and tertiary road network has been impeding the natural north-south flow of the rivers and excess runoff from occasional abnormal rainfall. The resulting consequence of water logging in the southern districts (as in Satkhira) has affected production drastically – to which ECHO has also provided support. A special case of ECHO support has also been the case of the Chittagong Hill Tracts where the population have suffered from rodent and other pest (wild pig) attacks that have disrupted the productive lives of the population.

52. **Efficiency of Response**

The Impact of the Response: To make judgements on how effective the Commission's disaster response projects are it is necessary to look at them in the context of what the government did or is doing and what other agencies, donors did or are doing. Whilst there is an urgent humanitarian imperative to save lives and provide assistance in the immediate aftermath of a disaster it is also crucial to save lives in the future by setting up structures that mitigate the effects of future disasters, that enable people to regain livelihoods, that empower affected populations to recover coping mechanisms. In Cyclone SIDR, for example, an estimated population of 3,200,000 people were affected with 650,000 having been evacuated to prepared storm shelters. The capacity of such shelters, however, was inadequate and still remains inadequate for the full number of those needing evacuation in cyclones of this scale and many remained and will remain exposed.⁶ The Commission and other donors cannot be expected to provide all this, and without a limitless pot of money can only address some of the affected population. In the case of ECHO projects responding to emergencies they have 1) achieved good impact on the targeted populations, 2) they have tried to dovetail in to the larger picture, by including DRR elements and by including advocacy through a 'rights based' approach as well as a needs based approach, and also through the EU head of delegation. Large-scale natural disasters, however, will always require additional emergency humanitarian aid and in this respect ECHO's constant presence in Bangladesh will enable it to respond accordingly, and with speed.

53. **Coverage:**

The coverage and average costs are shown in the table below. Although the evaluation made the calculations from figures extracted from all the fichops that they were made available to them, the figures should not be regarded as highly accurate for the reasons shown below.

⁶ Source : Bangladesh Disaster Management Bureau

Above all; methods for defining the numbers of beneficiaries covered varied from agency to agency; it is not possible to calculate the ‘soft’ benefits of the programmes, especially in the case of DRR and DIPECHO; and there was no way to distinguish between the seriously, moderately, and mildly affected population and so to give a percentage of people covered is not possible.

Table 1: Coverage

CATEGORY	COVERAGE OF ECHO PROGRAMMES	AVE. COST PER BEN.	COMMENT
Disaster Response	6,113,931 (<u>very approximately</u> ECHO interventions covered 7% of the ‘affected’ population – but this could give a totally fallacious impression.)	€27.45	<ol style="list-style-type: none"> 1. Based on Fichops since 2007, with additional caveats explained below. 2. Range of costs per beneficiary was €65 per person to €4 per person but this does not mean that each beneficiary was receiving this value of assistance. (i.e. to reach these figures the cost of the project to ECHO was divided by the number of beneficiaries). 3. The coverage does not take into account any multiplier, replication, training, economic/market, health and education access, benefits of the projects. 4. The coverage and costs do not take into account the period of time for the project which varies between 6 months and one year.
Rohingya Refugees	227,011	€18.01	<ol style="list-style-type: none"> 1. There are only 40,000 Rohingya Refugees in the 2 makeshift camps. 2. What the coverage shows is that a) the refugees have been helped in different sectors by different NGOs, and 2) this assistance has been repeated year after year.
DRR, DIPECHO	Not possible to measure with any accuracy, because of too many intangibles		<ol style="list-style-type: none"> 1. The ‘soft’ benefits – replication, awareness raising, training, and secondary benefits of the physical assistance, access to health, schools etc. (i.e. of resurfacing roads, raising the plinth levels of wells) DIPECHO programmes are not possible to measure.

54. Some issues:

1. Many of the beneficiary figures are calculated on the basis of family units and although it appears that most agencies use a figure of 5 people per household, this is not consistent and some agencies use a higher number.
2. In the disaster response projects there is almost certainly some overlap in numbers, inasmuch as different NGOs will be assisting similar populations, although in different sectors.

3. The Rohingya Refugee population in the makeshift camps are approximately 40,000 but if the figures are added up then it would appear to be many more, but this is because the same population has been assisted several times.
4. Some of the NGOs estimates as to the number of beneficiaries is broad – for example, Muslim Aid state in the fichop of February 2009 that their target number of beneficiaries was 711,000 people at a cost of €727,000 meaning that they were able to provide each person with food aid, livelihood support, shelter, NFIs, watsan and hygiene promotion for only 1€ per person. This does not seem likely and hardly seems possible. What is more likely is that certain parts of the affected population were assisted in different sectors or that the figure of 711,000 is merely an estimate and is probably the size of the population in the catchment area in which Muslim Aid is operating.
5. Similarly, probably due to the fact that only rough estimates are made of the beneficiaries in the fichops, in two fichops of 2009 agencies engaged in almost identical sectors show a situation where providing that support costs €4 per person from one NGO and €24 for another. A third one worked out at €10 per head for the same activities. (One agency was funded €400,000 to provide WASH, shelter for 81,600 people and another was funded €560,000 to assist 23,120 people.) In 2008 one agency providing shelter, watsan, and livelihoods worked out at €65.2 per person assisted and another agency providing shelter, watsan, and agricultural inputs worked out at €12 per person. Of course, these examples do not take into account what other funding these agencies might have been receiving or the very specific context of the areas in which they were working.
6. None of the coverage and cost on the fichops shows whether or which local NGOs are implementing the programme on behalf of the INGO. This would greatly add to an analysis of the cost-efficiency of ECHO's programmes.
7. Some of the budgeting goes towards cash for work and cash for training. These aspects can have a multiplier effect. Cash for example may help to regenerate local economies, and training can raise awareness amongst many more people than just the recipient of the training and so the effects of these sorts of ECHO programmes can reach a much larger number of people. In addition funding that goes towards some of the 'hard' assistance, such as the raising of roads, raising the plinth levels of wells, also has a multiplier effect – through improved access to markets, improved and speedier access to healthcare, to schools, and to livelihood prospects.

55. **Nature of ECHO Response**

Types of response: ECHO's response to the sudden onset of a disaster requiring an emergency response has followed the pattern of first; saving of human lives with the provision of food and/or cash to enable them to save themselves, and second; an equally important element, has been the restoration and strengthening of the coping mechanisms of the affected population, which effectively saves lives further down the line – basic elements of DRR and LRRD. This has included a wide range of measures supporting cash for work, income generating activities and cash for training. Support has also been provided for water and sanitation activities. The response has gone hand in hand with an effort to rebuild local capacities to offset the recurrent nature of the emergencies and equally importantly to try to

ensure that gains achieved in many aspects of development are protected. Recent reports, quoted by OXFAM, indicate that in the aftermath of cyclone AILA, despite major inputs of aid, many communities are worse off than they were before the disaster notwithstanding the aim of all humanitarian agencies 'to build back better'.

56. ***Restoration of Coping Mechanisms:*** In most project interventions, the rehabilitation of physical infrastructures, cash for work and/or training including support for income generating activities contributed to recovering livelihoods and to gaining food security. The restoration of the coping abilities of the affected people has implied a range of measures depending on the nature of the emergency. While the rehabilitation of canals for improving irrigation or drainage have constituted one element of support, providing seeds and other inputs to meet their productive needs or improving connectivity through the rehabilitation of tertiary roads⁷ by providing access to markets both for inputs and for outputs have been other equally important aspects of that support. All of these measures constitute elements that support recovery through food security by strengthening the coping strategies of the affected population, including support for income generating activities. Similarly, disaster risk reduction constitutes an element in shoring food security to the extent that it insulates the productive potential of the individual. In addition, the measures have an equal impact on assuring livelihood security through the ability to access medical services and schools and/or increased employment opportunities.

57. ***Partnership with INGOs – and the involvement of local NGOs:*** The implementation of the emergency measures has been through a partnership with international NGOs who, in turn, form partnerships with local NGOs for actual implementation. In some cases, as with Muslim Aid, ACF, and MSF the international NGOs directly implement the programmes themselves. The effectiveness of this approach has been variable and depends on the extent to which the NGO has been able to establish a collaborative association with existing local government structures, particularly in its ability to access local Government resources.

5.2 DIPECHO/DRR-related activities

58. ***Evaluation Questions:***

To what extent have DG ECHO-funded DRR activities contributed to reinforcing sub-national response capacities, including preparation and awareness of local communities? To what extent has this reflected in practical terms on the occasion of recent natural disasters and how well have DIPECHO-assisted areas responded, as compared to non-assisted areas?

To what extent have DG ECHO-funded DRR activities had an impact at national level, through replication, scaling up, advocacy, or complementarity with national initiatives?

To what extent has DRR been mainstreamed into the response activities?

59. **Work Done by the Evaluation Team During the Mission**

The evaluation team looked at many aspects of DRR and the DIPECHO programmes during the field mission. In addition, to several meetings in Dhaka on DRR topics, ranging from meetings with ECHO Bangladesh to meetings with the Government Disaster Management Bureau and the Fire Service and Civil Defence Training Complex, the team also visited sites

⁷ These have been primarily through cash of income and cash for training as well as support for income generating activities.

where projects were being implemented from Khulna province to the slum areas of Dhaka. On every occasion the team arranged to meet beneficiaries either individually or through talking to focus groups.

60. **Context**

Probably of all countries where ECHO operates, Bangladesh is one where DIPECHO programmes are most appropriate – where DRR measures are most needed. Despite the improvement of the government’s approach to DRR very much still needs to be done and the government does not have the outreach to implement DRR in all the areas that it is needed. Even in the capital Dhaka much remains to be done and without the DIPECHO programmes many parts of the vulnerable population would remain exposed.

61. **ECHO Approach:**

Multi-pronged strategies: The evaluation found that ECHO has developed a ‘twin pronged’ strategy towards DRR (although even within this there are multiple approaches). Since 2004 DIPECHO has included Bangladesh in its regional programmes, where they have implemented programmes through INGOs that support a ‘bottom-up’ approach – by working with local communities; the second prong of the strategy is that ECHO emergency response programmes have mainstreamed DRR by including a budget line in the funding for DRR.

62. The above is the fundamental approach but there are other strands in this strategy. DIPECHO and the Commission's response programmes take a ‘bottom-up’ approach by implementing their projects at community level in situations where communities are particularly vulnerable to disasters and where they need to enhance their disaster risk reduction and disaster preparedness measures at community level because government has inadequate outreach or capacity or determination to assist these communities. However, this part of the approach is anticipated to run in parallel with the strategies of other donors or instruments of the Commission, taking a ‘top-down’ approach by supporting capacity building of the government in DRR.

63. ***Inclusion of DRR:*** The evaluation considered that an important element of ECHO’s disaster response programmes was the mainstreaming of DRR. In all the ECHO funded projects DRR was mainstreamed – for example, it was used for raising the plinth levels of wells or raising the foundation levels of houses. This a) achieved efficient cash for work schemes, b) introduced an effective element of DRR by providing a guard against future disasters, c) provided at grass roots level a basic LRRD measure.

64. ***Implementing Partners & DRR:*** A concern of the evaluation was that some of the NGOs had very broad ideas on what DRR measures might be – to the extent that some of them believed that everything done in an emergency response was effectively a DRR measure. Arguably anything done to restore coping mechanisms might be regarded as a DRR measure, including, for example, the restocking of livestock (chickens and ducks, in this case), even though it is an activity that was going to be implemented by the NGO concerned anyway.

65. ***Impact:*** It was difficult, however, to measure the impact of such a diverse programme (which is part of a greater regional programme) in the time available. The concerns of the evaluation were that whilst for many of the affected communities the benefits of DRR seemed obvious, a) the communities who benefited were very small in number and so there was no

wide national impact, and b) the wide diverse nature of the projects probably diluted the overall impact.

66. ***DRR considered vital but could not be done without financial support:*** The evaluation found that most of the people to whom they spoke, both local government and affected populations were well aware of the need for DRR but they did not have adequate means to carry out such activities as raising the plinth levels of their houses without external financial assistance. If faced by the choice of using their money to buy food, pay for education or health care against paying for DRR measures, then the food, children's health or education etc. is always going to win. The same applies with local government, who will always tell you that first they don't have a budget and second what budget they do have is always used up for more urgent issues. Perhaps because of this and the depth of poverty in the country the multiplier effects, or replication of the programmes were not much in evidence.

Example 1: Multiplier Effects/Replication:

Multiplier Effects or Replication:

One community, in the slum areas of Dhaka had raised the road/footpath levels and the foundation levels of their homes and a school in a DIPECHO project, but one yard away the next neighbourhood, which had not received the benefits of an ECHO DRR project had done nothing – so for example the track deteriorated into a muddy foot way which becomes impassable when flooded, emasculating many of the benefits of raising the track next door. When asked by the evaluation team whether they did not think that it was a good thing to continue with the work, they pointed out that they could not afford it – that they did not have the benefit of a sponsor such as the next-door neighbourhood. (Who should be targeted for assistance was determined geographically – the areas most prone to flooding – and done with community participation working out which communities are poorest and most vulnerable). Thus the important multiplier effects or replication were not functioning and were not likely to, where the constraint is money. There will always be something more important for poverty stricken communities to spend their money on. The only way in which it might become replicable is through a 'rights based' approach where the communities put pressure on local government to introduce such measures

67. The evaluation saw other aspects of the DIPECHO DRR work in Dhaka, such as the flood mitigation measures and, importantly the disaster preparedness measures against the possibility of a major disaster such as an earthquake where huge casualties become a potentially overwhelming problem. Part of DIPECHO's funding goes towards training volunteers, some of whom the evaluation met and saw in action. Although, in theory, this should be a primary responsibility of the Government, their capacity in this sector has to be developed. The training of volunteers also serves another purpose, which is to raise community awareness and this too contributes to DRR and to aspects of LRRD. The assimilation of disaster risk reduction (DRR) measures in emergency response are also positive and appropriate steps towards evolving a framework on linking relief, rehabilitation and development.

68. ***Awareness raising*** is a theme that correctly runs through all the DIPECHO programmes and ECHO emergency response programmes. It is done in community settings, in women's focus groups, and at schools. It is an important element of a 'rights based' approach and will hopefully lead to more effective DRR.

69. **The Benefits of the Consortium System**

An interesting benefit introduced by DIPECHO has been the Consortium System, where several NGOs collaborate under the lead of one NGO on the same disaster management project. Such a system is similar to ‘basket funding’ and the benefits for ECHO, and hopefully for potentially vulnerable populations is that it delivers a pre-disaster management system that provides a more systematic comprehensive approach, bringing a consistent uniform package over a wider geographical area. For ECHO it introduces a system that narrows management focus by providing a single lead NGO, with whom they co-ordinate (although there are also some inherent dangers in this approach – see part 10). The consortia envisage working at several levels in disaster preparedness from government institutions to local communities and in doing this fulfil a major goal of DRR – that of multi-layered awareness raising.

70. **Long-term impact?**

The long-term impact, which might fit better into a ‘do no harm’ bracket is important in the context of DRR the very point of whose programmes are to have sustainability, to provide support to a community when all else fails. From the emergency donor’s point of view it is often difficult to assess what the long-term impact of a response might be partly because few evaluations or studies are done in the longer-term aftermath. Most evaluations are done within weeks or months of a disaster and in that timeframe any benefits may not have worn off. More needs to be done to look at the more distant impact of programmes such as DIPECHO programmes in Bangladesh to find out whether/how much communities benefit. For example, recent reports, quoted by OXFAM, indicate that in the aftermath of cyclone AILA, despite major inputs of aid, many communities are worse off than they were before the disaster notwithstanding the aim of all humanitarian agencies ‘to build back better’, although in the recent flood alerts that took place in Bangladesh, whilst the evaluation team was there, ECHO assisted communities responded much more quickly and effectively to the alerts than non-assisted communities.

71. Although it was clear to see that there were great benefits for the populations that were assisted by the programmes, it was not clear to the evaluation team that the ideas were being replicated in, for example, neighbouring communities. The clearest constraint was that neighbouring communities would only help themselves if they were assisted to do so – in other words the financial resources required to, for example, raise a foundation, were already committed to more urgent needs. There is also a thought that the impact of the programmes are diluted by the variety and size and that it may be better to focus on a single larger project.

5.3 Rohingya Crisis

72. *Evaluation Questions*

To what extent have DG ECHO-funded activities succeeded in delivering an appropriate level of humanitarian assistance to Rohingya refugees?

To what extent have advocacy efforts promoted by the Commission been successful in reinforcing the conditions of life of Rohingya refugees and increasing the level of protection?

73. **Work done by the Evaluation Team during the Field Mission:**

As well as the work done during the ‘desk study’ phase of the evaluation, to evaluate the ECHO programmes with the Rohingya Refugees the evaluation team conducted the following activities during the field mission:

- 1/. Meetings with ECHO Bangladesh and the Head of the EU Delegation,
- 2/. Meetings with UNHCR in Geneva; the head of UNHCR in Bangladesh; the head of the UNHCR field office in Cox's Bazar;
- 3/. Meetings in situ (i.e. in Cox's Bazar) with ECHO's implementing partners for this crisis, MSF/H, ACF, Muslim Aid (who hosted the team's visit);
Field visit to LEDA Camp, where they also spoke to Rohingya Refugees themselves.

74. **Main Points:**

- ❖ ***Serious but Intractable crisis***, with no end in sight, given, 1) the 'hard line' position of the government of Myanmar, (although when ECHO first became involved in support 5 years ago a caretaker government was in place and it was anticipated that there would be a more benevolent attitude to the Rohingya) 2) the fact that it has evolved into a major regional issue (approximately 250,000 refugees in Bangladesh, 500,000 in Saudi Arabia, 111,000 refugees housed in 9 camps along the Thai-Myanmar border and many hundreds of thousands of others in the region) 3) the obdurate approach of the government of Bangladesh. UNHCR is making little headway either in Bangladesh or with the government of Myanmar, or regionally and the non-citizen, stateless position of the Rohingya makes any sort of cessation clause or status determination exercise impossible.
- ❖ ***Hard-line announcements:*** Recent announcements from the governments of Myanmar and Bangladesh have aggravated the situation and the position of some of the NGOs working with Rohingya Refugees has become more tenuous. UNHCR considers that in Myanmar there is a severe danger that this form of religious fascism shows dangers of translating into ethnic cleansing with all the consequences that would bring not only to Myanmar but to Bangladesh and the region. At the same time there is reluctance on the part of the international community to tackle the government of Myanmar 'head on' on this major human rights issue, because in other respects they are showing signs of changing and improving.
- ❖ ***Government of Bangladesh:*** Within Bangladesh the government has a hard line, which further marginalises Rohingya Refugees and also affects the work of the NGOs who are frequently being harassed, ordered to stop work to support the refugees, and being denied work permits, makes their work, in effect, illegal. This has happened to Islamic Relief, and is happening now to Muslim Aid, MSF and ACF.
- ❖ ***Rohingya Ostracised*** and not recognised, no rights, no status, either in Myanmar or Bangladesh – UNHCR defines it as the problem of '*the Palestinians of S. Asia*'.
- ❖ ***Advocacy:*** UNHCR and the aid agencies believe that the only solution is through international advocacy, major 'Protection' issue, (human rights, IHL, etc.)
- ❖ ***There is a humanitarian imperative*** to address the humanitarian problems of this banished and stateless population who have no voice and no protection, and who are particularly exposed, with no official means of livelihood, living in fragile conditions in crowded unsanctioned camps (malnutrition rates higher than even the rest of Bangladesh), even though through the support of ECHO and its' implementing partners conditions in LEDA camp (the unofficial camp visited by the evaluation) have improved.
- ❖ ***Appropriate for ECHO to Support:*** It fits with the ECHO mandate to respond but it is going to remain a serious humanitarian situation for the foreseeable future, which means that the Commission would have to commit itself over the long-term, which does not fit

easily with the mandate of an emergency response donor although it is accepted that it is not incompatible with the mandate of a 'humanitarian' donor – where the 'humanitarian donor' has the instruments to address a long term chronic emergency.

- ❖ ***Humanitarian assistance, however, in this case is mostly a 'Band-Aid' solution.*** This is a major 'protection'/human rights issue. UNHCR believes that the only apparent sustainable long-term solution is through strong pressure on relevant governments. ECHO is part of this strategy through the advocacy of the Head of the EU Delegation.

75. **Background:**

Regional Situation: It was an appropriate time for the evaluation team to conduct a mission to the unregistered camps supported by Commission funding (although for security reasons and time constraints only LEDA was visited). It was at a time when there was fresh violence in Myanmar between majority Buddhists and the stateless Rohingya in Rakhine province, forcing many Rohingya to attempt to cross into Bangladesh but the government of Bangladesh was continuing with its tough stance on this matter and was refusing entry, whilst the government of Myanmar was asking UNHCR to take all the Rohingya and send them to a third country. (UNHCR had to explain to Myanmar that their role did not include creating refugee situations).

76. **Government Position:**

Whilst the evaluation was in Bangladesh the Government was expressing its disapproval of the recent visit to Teknaf and Cox's Bazaar by the UNHCR representative in Bangladesh. The inflexible government position on this issue is that the country cannot accommodate new refugees from another country; that the Rohingya are, in any case, not refugees but economic migrants; that the UN should try and focus their efforts in Myanmar, so that Rohingya are not forced to leave their own country; and that the Government will resist efforts to assist the refugees. The government of Bangladesh is not obliged by any treaty – it has not signed the UN Convention of the Refugees – to provide shelter to the fleeing Rohingya.

77. Repatriation for the refugees who had entered the country in late 1992 has been stalled since 2005 (a legal complication whereby they cannot be repatriated if they are stateless or if they are not registered), and the government of Bangladesh has only allowed 25,000 refugees to be registered and will not allow any more, including the additional 4,000 who have been born to the original 25,000.

78. Beyond the registered 25,000 refugees in the camps, it is believed that there are over two hundred thousand unregistered Rohingya in Bangladesh (although UNHCR considers that this may be a conservative estimate). Civil society groups in Bangladesh also seem to be cautious in making their position on this issue clear being regarded as 'complex' and very 'sensitive'. In the meantime as seems to be typical with many refugee situations the Rohingya are used as scapegoats for all the issues arising in the Cox's Bazaar region. This makes work with Rohingya very difficult for ECHO and its partner organisations.

Example 2: Working Difficulties in Supporting Rohingya Refugees

Working Difficulties of ECHO Partners in Support of Rohingya Refugees

To illustrate the difficulty faced by ECHO and partners in addressing this grave humanitarian situation whilst the border security force of Bangladesh (BGB) was arresting and 'pushing back' Rohingya to Myanmar, (although with a degree of restraint and sensitivity thanks in part to the recent awareness-raising courses run by ICRC in Bangladesh), the Government of Bangladesh through the local authorities in Cox's Bazaar were

issuing warnings to the NGOs (including implementing partners of ECHO), who are working in the two refugee camps at Ukha and Teknaf against any 'interference' in the current crisis. Another of ECHO's partners, Muslim Aid, at the time of the evaluation was asked to stop working in the unregistered camps

79. **Justification for Humanitarian Intervention:**

From a humanitarian perspective the plight of the Rohingya Refugees is very serious and particularly that of the unregistered refugees, which is what most of the Rohingya are – there being only 25,000 officially registered amongst a population of over 250,000 (unofficial) refugees, some 40 000 of whom are receiving ECHO support.

80. The residents of the unofficial camp of LEDA are stateless; they have no voice, have no rights, no protection; and they live in unacceptable conditions more vulnerable than the rest of the population in Bangladesh to illness (including stress and mental illness), malnutrition, and to the consequences of any of a multitude of disasters that might hit Bangladesh. Legally in Bangladesh they have no rights to work and so have no means of livelihood.

81. The partners **cannot**, provide food (even in the official camps WFP is only allowed to provide food for the officially registered 25,000 beneficiaries). The rates of malnutrition in LEDA camp alone are higher than the already dangerous threshold rates prevalent in the rest of Bangladesh. The only alleviation to their humanitarian adversity comes through the work of the implementing partners of ECHO who are limited in what they can provide – medical care, shelter, WASH and limited nutrition and protection interventions.

82. The evaluation found that there was a humanitarian imperative to address the humanitarian difficulties of the Rohingya Refugees, although their situation appeared to be intractable and there was no end in sight, presenting an ambivalent situation for an emergency donor. UNHCR believes that without the funding provided by ECHO for the makeshift camps the situation of the refugees living in these camps would deteriorate drastically.

83. Nevertheless, ECHO is a service of the Commission designed to respond to emergency humanitarian crises and whilst ECHO also fulfils an important function in responding to 'forgotten crises' its funding mechanisms are devised for relatively short term interventions. ECHO is, in this case, **committing itself to a long-term humanitarian crisis** (bearing in mind that the crisis of the Rohingya Refugees influx into Bangladesh began in 1990 and fresh influxes were arriving during the three weeks that the evaluation team were in the country) and it is questionable whether, therefore, it is the best instrument of the Commission to do so. Despite the changing attitude of the government of Myanmar, there is nothing to indicate that their attitude to the Rohingya Refugees will change quickly. Even Madame Suu Kyi, such a strong advocate for human rights and minorities, shows no signs of sympathy for them. In a speech, which she made a month after the deadly clashes in parts of Burma's western Rakhine she said that she did not know whether Rohingya should be regarded as Burmese citizens. At the same time, the attitude of the Bangladesh towards the refugees does not appear to be changing either, even though 70% of the refugees in the official camps were either born in the camps or brought to them as infants.

84. The Commission's response to the Rohingya Refugees does, however, provide a good example of co-operation in a type of LRRD process between the Delegation and ECHO, where they work closely together, fulfilling a form of LRRD strategy. ECHO provides funding for the most vulnerable refugees in the makeshift camps of LEDA and KUTUPALONG, through NGOs such as Muslim Aid, ACF, and MSF, whilst the Delegation supports the programme of UNHCR in the official camps for the limited numbers of registered refugees, through funding from the AUP instrument. This is an appropriate example of how different instruments of the Commission can work on the same crisis.

85. ECHO also engages in advocacy in conjunction with the Delegation, through the voice of the Head of Delegation, in a situation where UNHCR believes that the only apparent sustainable long-term solution is through strong pressure on relevant governments. These actions demonstrate coordination between different instruments of the Commission in what is, effectively, and LRRD strategy.

5.4 Efficiency of Response

86. *Evaluation Question:*

Main factors that affected the effectiveness and the efficiency of DG ECHO activities, in terms of:

Context of the intervention

Implementation of the response

Coordination and complementarity of the different actors

87. The question of efficiency is cross-cutting and is dealt with throughout the document when referring to all aspects of ECHO interventions – see individual sections of the report. In general, however, as far as ECHO is concerned and most of its implementing partners from what the evaluation team saw the interventions were efficient in the context of the intervention, in the implementation of the response, and on the choice of partner. It should be pointed out that much of the field visit was to projects that had already been implemented and so it is difficult to judge how efficient the response might have been at the moment that it was activated. The two major interventions that were on-going whilst the evaluation team were present were the response to the rodent infestation in the Chittagong Hill Tracts – all aspects of this were appropriate and efficient and the evaluation team have already commented on the fact that they considered the balance between cash and food not only to be appropriate but an efficient system – in that there is no wastage. The other real time response that we witnessed was to the Rohingya Refugees makeshift camp situation. Once again this was as efficient as it could be in all contexts, bearing in mind the severe constraints imposed by the government on both the Rohingya Refugees and any agency that tried to help them.

88. ***The timeliness of the response.*** There was little complaint on the timeliness of ECHO's response, from the partners – indeed it is noticeable that in many of these crises ECHO has used its 'Première Urgence' funding instrument which provides funding, to the maximum amount allowable, within 48 hours. Nevertheless, it could be argued that ECHO's response was not always timely. In the case of the CHT, the affected population state that the situation has been building up for at least 5 years. In this respect, the lack of timeliness is not the fault of ECHO but a fault in the humanitarian surveillance system for not appreciating the indicators quickly enough or on the part of the government of Bangladesh for either failing to recognise disasters or for refusing to acknowledge them as such for political reasons. It should also be noted that most of ECHO's partners have a development orientation and may not understand the humanitarian indicators sufficiently. (See also sections on INGO/Local NGO relationship). ECHO, however, responded as soon as they were alerted to the disaster.

89. ***The appropriateness of the response*** – from the what was seen in the field mission, most partners provided an appropriate response and focussed on basic life saving (both in the short and medium term) sectors – potable water, food, shelter, and included DRR elements in their projects to mitigate future disasters,

90. ***The selection of partners to implement the response;*** Whilst there is nothing that the evaluation saw that indicated anything other than that the partners of ECHO were entirely appropriate to implement an emergency response, two factors were noted:

- 1/. Much of the emergency response has physically been directly implemented by local NGOs although it is the INGOs who have been funded. The local NGOs have no direct responsibility to the Commission, although their work is, obviously managed/supervised by the INGO, who are accountable. Although the local NGOs undoubtedly have the benefit of good access in an emergency it is not clear what capacities some of them have for implementing emergency response and to what extent this is taken into account by ECHO's INGO implementing partner. See further discussion on these issues in section 8 of this report.
- 2/. Currently many of the INGOs to whom ECHO would turn if there were to be a major emergency are more orientated towards development work. It is important, for the future, to ensure that if they are focussed on development work, they also have the capacity to respond quickly to emergencies – which means having the emergency personnel to upgrade their team swiftly, the access to the materiel needed, the knowledge of emergency systems and the ability to adjust to emergency coordination. In this context, however, the evaluation noted that the INGOs who are development oriented, are mandated and capable of responding to emergency – this is, supposedly, one of the general strengths of INGOs in the country, although the evaluation was not able to witness this.

91. ***The 'shrewdness' of the response*** – Most of the ECHO projects mainstreamed DRR, which demonstrates a longer term approach, that may help the affected population to survive in the future, recover livelihoods and build up their coping mechanisms. In this respect also ECHO appears to have adopted a sensible attitude by developing symbiosis between the DIPECHO projects and its disaster response projects. See, however, comments on genuine/effective DRR strategies in next section.

92. ***Targeting:*** An important element of efficiency, which sets the standard at the outset of an emergency, is the aspect of targeting, which, in turn requires effective needs assessments. The evaluation discussed targeting and needs assessments with all of the implementing partners that were met and in most respects found that the targeting was effective, bearing in mind that it was necessary to prioritise rigorously. After identifying disaster affected areas forms of mapping were used and some of this derived from WFP's mapping of poverty, which effectively narrows down the groups to be targeted. Concurrently liaison with the government also assisted targeting, both nationally and locally. Within the geographical areas identified much ground level assessment took place, utilising community participation and this participation was certainly approved of by the beneficiary groups to whom the evaluation spoke. The consortium system also improved targeting in two ways, 1) because the consortium has a greater outreach and can identify needs in a larger area, and 2) by working together they produce a standardised package. The INGO/Local NGO relationship also enhances targeting in most circumstances, through the access that the local NGO has to communities, although care has to be taken that the local NGO is not pressurised into favouring specific communities.

93. ***Process dominated:*** Concerns arising from the evaluation were that needs assessments and targeting, although in most cases extremely conscientious, 1) still lacked a common approach (but this is where the consortium system has an advantage, and also an issue that would be addressed by the cluster system) and in the opinion of the evaluation had 2) become

almost too process-dominated rather than outcome orientated. In other words the NGOs were developing time-consuming systems and forms to conduct needs assessments, and were using these to demonstrate that they were following correct humanitarian policies rather than focussing on what the end result needed to achieve. It was also considered that this process focus was used as an inelegant form of monitoring the work of the local NGOs. Some of the INGOs argued that this evolution of needs assessments and targeting was as a consequence of the procedures that they had to follow in preparing submissions for funding to donors such as ECHO.

94. An aspect of efficiency that needs to be considered is that the consortium coordination system may have a major disadvantage in an emergency situation, which is the ability to respond rapidly. This is because they need to reach a consensus and so when there are many NGOs in a consortium this can take a lot of time. There are, for example, 6 international NGOs in the NARRI consortium, and 13 local partners – a total of 19 members. In the case of some of the ECHO projects it has taken as long as two months to reach consensus.

95. The only open question on efficiency that is left is that of the use of local NGOs by INGOs and here the question is one of cost-effectiveness for ECHO, when the agencies that they are paying to do the work, are in fact sub-contracting or ‘partnering’ local NGOs – a question of additional overheads, and an ethical question as to whether the local NGOs have the same approach to humanitarian aid, are impartial and neutral or are free of pressures. A complete section on this subject now follows.

5.5 Additional findings on the INGO/Local NGO/ECHO relationship in the context of coordination:

96. Background – Use of Local NGOs:

With the exception of Muslim Aid, MSF, and ACF, most of the ECHO projects were physically implemented by local NGOs, with supervisory/capacity building/mentoring activities conducted by the international NGOs. This includes the DIPECHO projects where, for example, the six international NGOs in the consortium implement the projects through 13 local NGOs. The team even found in one situation that the national NGO partner of the ECHO framework international partner receiving the funding had further subcontracted work to a local partner. This is an issue that should be considered under both ‘Efficiency’ and ‘Humanitarian Coordination’. It was not possible to determine in the limited time available, whether it causes dilution of the implementation quality or not. If done in a planned fashion, it could actually be a better option bearing in mind the closer relationship of the local NGO with the community and their superior local knowledge.

97. Context with ECHO

Whilst realising that ECHO is fully aware that much of the ‘work at the coalface’ is done by local NGOs it was not established to what extent these associations are formalised and the issue provokes some serious consideration particularly about what should be the relationship of ECHO with local/national NGOs. The local NGOs are not accountable to ECHO either in terms of funding or political or **ethical perspectives** and many of the local NGOs to whom the team spoke sometimes had little idea or had significantly different thoughts on the principles of humanitarian aid – humanity, neutrality, impartiality, freedom of access. Currently in Bangladesh there is a strong movement to set up NGOs and, although this may

be for purely altruistic reasons, many cynics argue that ‘NGO business is the best business to be in’⁸.

98. The issue also raised much debate in the context of coordination and particularly in the workshop at the end of the evaluation. Although it is a common practice globally for INGOs to implement many of their ECHO-funded programmes through local NGOs and indeed for many of the INGOs in a country **to be made up almost entirely of national staff**, including heads of office, (ActionAid Bangladesh told the ECHO LNCO evaluation that it has been fully nationalised for the past 2 years and is entirely run and managed by national staff - 108, no expats, including its own governing board – this surely must make it a local NGO); and although ECHO is aware of this, the degree to which it is done in Bangladesh raises many coordination questions, some of which are:

- ***How does humanitarian coordination work with ECHO/International Agency, INGO/Local NGO equation?*** The only official/legal interface as far as coordination is concerned is between the international agency and ECHO; there is therefore a coordination gap, although the international agency would indicate that they carry out the necessary coordination. This, in theory should be fine, if the coordination from the international agency is satisfactory, (which it generally is), but, for example, one of the concerns of the evaluation team was the amount of monitoring conducted by the international NGO, which in many cases appeared to be minimal (if not grossly inadequate) – most international NGOs and local NGOs indicated that it was approximately once or twice a month. How can 2 expatriates, for example, effectively monitor the activities of 83 local NGOs? If they only spend one day with each of the NGOs they would need nearly 3 months to cover them all (working weekends and all hours of the day!)

Some of the local/national NGOs are large enough and have sufficient expertise and experience that they do not believe that they need the mentoring of the international NGOs. What they need is funding and in return for that they can provide the INGO with the capacity, the flexibility and the access to work within Bangladesh.

- ***What is the added value of the international agency for ECHO?*** One might even ask whether the INGOs exist in Bangladesh, except in name only, and one or two token international staff. ECHO cannot fund local NGOs, and yet effectively that is what they are doing through the auspices of the international NGO. The cost benefits for implementing programmes through an international agency only become apparent if the international agency 1) ensures the effectiveness, impact, cost-efficiency, and general benefit of the ECHO programme, and 2) ensures that the programme meets the aims of ECHO, which can only be achieved through efficient coordination and monitoring. It is difficult to believe, for the reasons mentioned above, that this can be achieved.

99. From speaking to local NGOs in the field it seemed that monitoring visits from the international agencies were not frequent and were quite short in duration – often a maximum of 24 hours. The international agencies indicated that 1) the local NGOs often had sufficient expertise that they did not require regular monitoring once the programme was being implemented, 2) that micro management diluted ‘capacity building’, 3) that field visits were not the only form of monitoring and that much monitoring could be carried out through analysis of the reporting systems that had been developed and through other measures that had been taken – the exchange of information and expertise through workshops, the use of the

⁸ Although the number of NGOs registered with the government’s NGO Affairs Bureau, (who are entitled to receive foreign funds directly from donors) is under 2,000, the estimated actual number of NGOs in the country is in the region of 20,000.

internet, (even to the extent that one international NGO had introduced a system where each latrine had a GPS designation). This is not surprising when considered against the number of the local NGOs that some of the INGOs work with. In the case of OXFAM only two expatriates work with 83 local NGOs and 500 unfunded ones.

100. **Advantages and Disadvantages:**

Although it has been suggested that this was a sub-contractual relationship or that the INGOs were acting as ‘donors’, the INGOs in Bangladesh were quick to correct those perceptions pointing out that it was a true ‘partner’ relationship which brought many benefits for the communities, the donors, and the INGOs or international agencies, not least in matters of coordination. The benefits of working with the local NGOs for both the INGOs and the local/national NGOs are numerous:

- ***Local context/knowledge:*** Local NGOs know the context better, culturally, politically, socially, and economically; they have a much better social and political capital needed to effectively operate locally;
- ***Access:*** Working through local NGOs not only increases the geographic outreach of the INGO, but gives them access to areas that they would not otherwise be able to approach (for all sorts of reasons – social and cultural restraints, security constraints, political, language). Classic examples, war in Lebanon 2006 where many International NGOs only had access to Hezbollah controlled areas through local NGOs, especially if the NGOs were American, similar in Pakistan. By working with local NGOs international NGOs will gain access to areas during an emergency that might not otherwise be accessible and for which they cannot afford time to spend negotiating access, plus they will have a better understanding of such issues as cultural restraints.
- ***Big disadvantages*** (put forward by evaluation team) however in working through local NGOs (or national Red Cross branches) who have strong party political affiliations, regressive cultural orientations, or faith fundamentalism, (classic examples SCF & local workers in Darfur, World Vision and local NGOs in Lebanon and Banda Aceh, American fundamentalist Christian NGOs working with local Christian NGOs (feeding off the excesses of each other) in HIV/AIDS pandemic in Zambia). If not careful, INGOs may easily get trapped by local NGOs with poor governance mechanisms and by managements with nepotistic practices, non transparent financial dealings and so on!
- ***Sustainability:*** There is the element of sustainability of benefits – which local NGOs can ensure through building local capacity – knowledge, skill and building resilience of the communities etc. They considered that their roles in respect of the partnership with the local NGOs were as follows:
- ***Channelling international experience*** and expertise in managing disaster through INGOs is a great value addition. International NGOs have great experience in coordinating the activities of the local NGOs and can direct them to maximum effect for themselves and for the donors, (Similar to above but with an emphasis on obtaining funding rather than motivated by altruism): To act as a conduit for funding, and in that respect to ensure accountability through regular monitoring,
- ***To act as mentors, to devise the strategy for the local NGO,*** which will then be put forward to ECHO, and to enhance the knowledge of humanitarian principles, to monitor the implementation of the programme, on behalf of the donor, as well as

themselves; to act as ‘middle management’ especially in situations where donors capacity is limited,

- ***To enhance the capacity of the local NGOs***, although the evaluation team were unable to find any concrete examples of effective capacity building and considered that capacity building and support from INGOs are conveniently indeterminate, measured against individual INGOs perception of what capacity building consisted of and no records kept of what ‘capacity building’ had been carried out or what its impact has been. Such capacity building approaches must be consistent (according to predefined standards), in order to avoid confusion between training provided by many different (and often successive) international agencies and donors.
- ***To assist with logistic aspects of the project.***

5.6 Additional Findings on LRRD

101. Throughout the evaluation the team examined aspects of LRRD/Transition, both in terms of post disaster response and linkage with DRR longer-term initiatives. This was accomplished by discussing with the Commission and implementing partners what measures were being taken to implement the linking of relief, rehabilitation, and development. Most of the INGOs were aware of the concept of LRRD, without necessarily attaching great significance to it, but many of the local NGOs were not very aware of the theory beyond the fact that they wished to extend their work with ECHO implementing partners for as long as possible. The evaluation team found that DIPECHO and its projects were an important way of implementing LRRD and that the ‘consortium’ was an effective system for doing this.

102. **Main Issues:**

- ◆ **Transition approach needed:** Bangladesh is a country where some form of LRRD/Transition approach is needed; where sudden onset disasters occur concurrently with chronic humanitarian situations and yet where there is sufficient stability and a functioning government that development activities can be implemented on a relatively solid foundation.
- ◆ **No formal LRRD strategy:** There is no formal ECHO LRRD plan in place, nor is there any exit strategy, although there is considerable discussion, liaison and good relationships between ECHO and the Delegation. In addition, many aspects of the ECHO programmes and their relationship with the Delegation form the basis for LRRD, even without an articulated plan.
- ◆ **DIPECHO projects** in Bangladesh are also effective forms of LRRD, and the Consortium system is an efficient structure for the extending of LRRD.
- ◆ **Development orientated NGOs:** Because many of the NGOs in Bangladesh are heavily positioned towards development they are able to extend their emergency programmes into development or they have the capacity to do so. This is a form of LRRD, although not expressed as such nor clearly coordinated with that in mind.
- ◆ **Use of Commission Tools to implement LRRD:** Some of ECHO’s NGO partners understand the different use of Commission tools and the timeframes, and running alongside ECHO humanitarian programmes they also engage in development projects, often funded by the Delegation, and so by default they are in an LRRD process. Some of ECHO’s implementing partners also have projects with DfID who, generally have longer-term programmes than ECHO. This is something that both ECHO and DfID in

Bangladesh are aware of, and which they work with in a coordinated manner (although informally) and this, therefore, is another form of LRRD.

103. **Context:**

Given the nature of the humanitarian situation in Bangladesh – i.e. that it is the result in large part of overwhelming poverty, exacerbated by chronic malnutrition and for many parts of the population limited food security, compounded by chronic flooding, and regular and cyclical disasters it is clear 1) that there will always be a need for emergency humanitarian aid, but 2) at the same time the only way to deal with the overarching problems is through sustainable, long term development aid, where the government has to have input and ownership even though limited in capacity and possibly, resolve. The necessary bond between emergency aid and development support creates a situation where a form of ‘LRRD’ or ‘Transition’ becomes essential and has to be considered in parallel with most of the humanitarian situations that exist in Bangladesh – from the serious issue of malnutrition to the fate of the Rohingya Refugees.

104. The problem for the Commission in the context of LRRD and the situation of Bangladesh, as an emergency donor, is that emergency humanitarian aid will deliver services rapidly (and ECHO Bangladesh has been complimented on this by all the agencies that we spoke to) but is ill suited both in mandate and budgetary instruments to engage in sustained capacity building, whilst development aid, which considers that the use of state capacity is crucial for a sustainable solution and is therefore bound to work with government bodies, is governed by the speed at which these institutions, often weak, undermined by corruption and lacking in absorption capacity, are able to work. In Bangladesh that is often very slow, without adequate outreach. Emergency humanitarian aid, which in the case of ECHO, attempts to be an apolitical, emergency-orientated and short-term form of relief primarily to save lives – not endeavouring or pretending, necessarily, to provide sustainable solutions although with an increasing awareness of the principles of ‘do no harm’ and the need for comprehensive approaches. In addition, Commission development aid is distinguished from humanitarian aid by focusing on alleviating poverty in the long term, rather than easing suffering in the short term – which also explains another of the big differences between humanitarian aid and development aid – humanitarian aid focuses much more on details and immediate needs where development aid looks ahead at the ‘big picture’. Nevertheless, the focus in Bangladesh is on the big picture.

105. At the same time, whilst there are chronic humanitarian situations which require constant or steady responsiveness, the sort of sudden onset emergencies that ECHO normally addresses do not occur all the time, and neither are there many ECHO partners in Bangladesh who are dedicated exclusively to emergency aid – possibly only MSF/H. Most of ECHO’s partners are actually occupied in various aspects of development aid and even when they were implementing programmes in direct response to emergencies such as AILA their projects focussed for the greater part on early recovery. The importance of this is twofold; 1) the implementing partners being mostly orientated to development activities, 2) by default there is a form of LRRD in place, even if not strategically planned for.

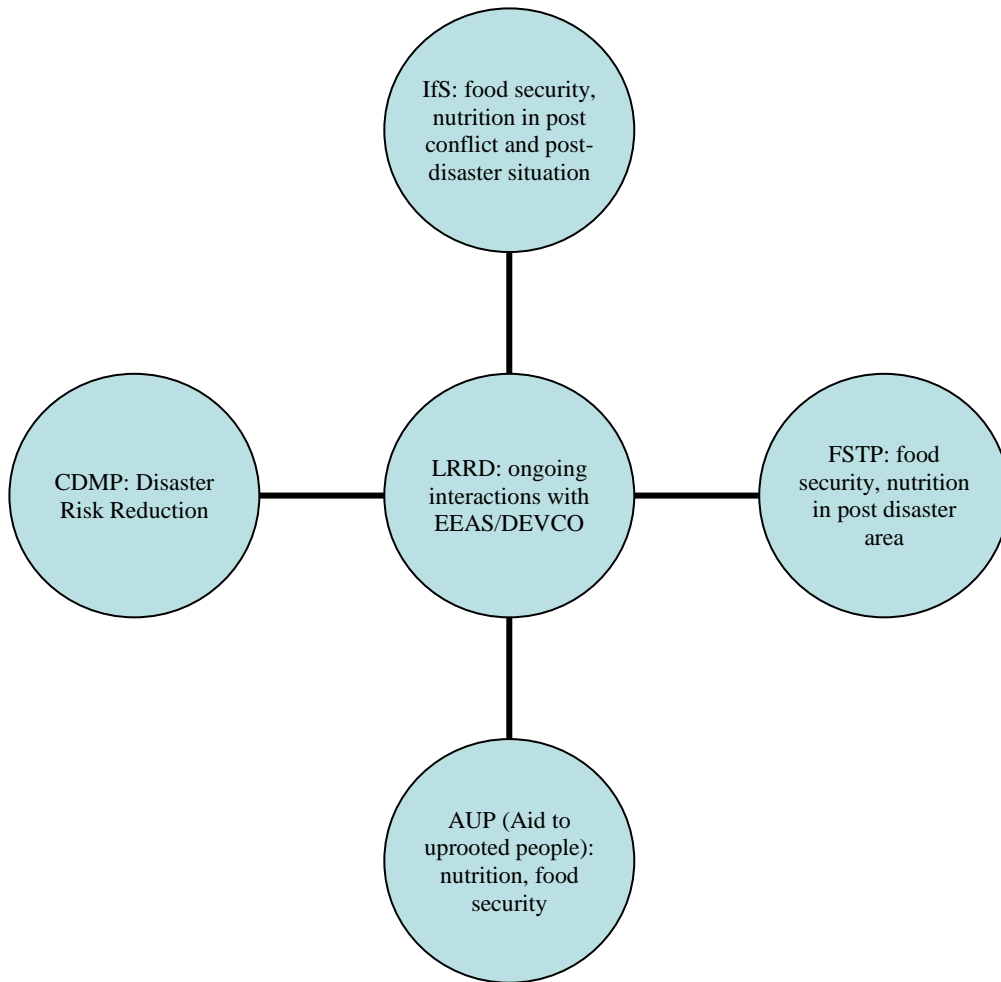
106. **Some LRRD Strategies in Bangladesh:**

Although the evaluation found that there was no formal strategy for linking relief, rehabilitation and development, or that there were any articulated systems for a comprehensive approach, elements of such a strategy were in place and were functioning, albeit possibly without a consistent structure. This happens in a number of ways:

- On aspects of an LRRD strategy, ECHO and the Delegation cooperate closely and in this respect are aware of each other's programmes. An example of co-operation on a type of LRRD process between the Delegation and ECHO is with the Rohingya Refugees, where they work closely together, fulfilling a form of LRRD strategy both in terms of material assistance and advocacy.
- Between ECHO and the Delegation there is, for example, also much discussion on food assistance, but the issue between ECHO and the other instruments of the Commission is the difference in timelines.
- Both response interventions and DIPECHO programmes all contain elements that focus on early recovery and sustainability. For example the simple DRR action of raising plinth levels of houses, help mitigate the effects of future flooding and thus strengthens coping mechanisms.
- There is active liaison between ECHO and other instruments of the Commission at the Delegation. In particular there is liaison with the FSTP, as a longer-term way of addressing the situation with malnutrition, there is liaison with IfS and AUP. A summary of the interaction between ECHO and other instruments of the Commission is shown below⁹:

⁹ DEVCO/EEAS preparation of the next programming cycle (2014-2020), ECHO country fiche, *Bangladesh*

Example 3: LRRD Interactions between ECHO & Delegation



- There has already been some productive coordination between DfID who sees ECHO as an excellent flexible donor for emergency response, and who themselves try to provide more sustainable continuity through their more lasting projects. An interesting example of this symbiosis was seen in some of the villages where ECHO through its cash for work programmes had improved the roads and reduced the impact of flooding by repairing dike walls, whilst in the same village DfID was raising the plinth levels of houses – a coordinated approach.
- Most of these NGOs in Bangladesh are well acquainted with the other funding mechanisms of the Commission and make use of these as well as funding from other donors in conjunction with the ECHO funding. NGOs such as OXFAM develop multi year plans for their work in Bangladesh and can tie in their emergency response actions into longer-term programmes; this can be seen as a form of LRRD. Care, however, has to be taken to ensure that ECHO, with its much quicker funding mechanisms is not merely used as a ‘bridging loan’ bank for NGOs waiting to obtain long-term funding for development purposes. It is also important that if there is a major disaster that NGOs are capable of providing an adequate emergency response.

Example 4: Concepts of LRRD

Concepts of LRRD

It is increasingly believed that, to implement LRRD/Transition strategies, rigorously following a sequential compartmentalised mind-set i.e. *Crisis* → *Emergency Response* → *Relief* → *Rehabilitation* → *Development etc.*, or *Emergency Aid Agencies* → *Early Recovery Instruments, Development Programmes*, should be avoided. Activities that in the past were seen to be either humanitarian or development are now increasingly recognised as interlinked and possibly inseparable, if a successful LRRD strategy is to be developed for a situation such as exists in Bangladesh. If LRRD or Transition is thought of in terms other than occurring as a linear sequence and as a variation of a ‘quantum’ state of parallel worlds where humanitarian aid is needed concurrently to development support; or if it is thought of as a strategy for using different instruments in the same setting, then LRRD is being implemented in Bangladesh. Alternatively, it could be thought of in spatial terms where humanitarian aid continues to be applied to certain areas, whilst sustainable progress is achieved in others through development aid. Most important of all in the context of LRRD is the adverse effect of ‘compartmentalisation’ whereby sectors such as ‘emergency humanitarian aid’, ‘rehabilitation’ and ‘development’ are regarded as separate entities and the instruments used to address these issues are also disconnected.

If LRRD is conceived of as a linear sequence, or as an exit strategy for an emergency donor, then LRRD as it exists in Bangladesh does not fulfil this objective.

107. Need for Refinement of Strategy:

Whilst elements of an LRRD strategy exist this needs to be developed into a more coherent structure and bring into play more effectively other instruments of the Commission. In particular this has to be considered in the context of the crises with the Rohingya Refugees, and with malnutrition but given that most of the humanitarian problems in Bangladesh can be considered as chronic, repetitive, cyclical, aggravated by uncontrolled capitalist enterprise and lack of government regulation possibly LRRD has to be considered differently. In the specific case of the Rohingya Refugees, it may not be appropriate to think of the Rohingya Refugee crisis in the context of LRRD but, rather, as a chronic long-term emergency awaiting a political solution, where no LRRD strategy is suitable. Therefore, although it has probably been recommended many times in the past, the Commission should consider whether DG ECHO should possess longer term funding mechanisms for use in these situations. Concurrently ECHO’s implementing partners also need to be able to develop a longer-term but flexible strategy rather than merely to expect repeat funding for projects that combine addressing immediate needs with little towards sustainability (vital, though, providing for these needs may be).

5.7 Additional Findings on Food Security & Nutrition

108. Work done during by the Evaluation Team during the Field Mission:

During the evaluation food security and nutrition were issues that were discussed with many of the implementing partners and many of the projects that were visited included these sectors in their make-up. The evaluation team looked at food security issues in the Chittagong Hill Tracts and in the Rohingya Refugee Camps. They spoke to the populations who were constantly affected by floods and water logging over their food security concerns. They visited health clinics in Satkhira where several of the children were receiving nutritional treatment.










109. Background:

Adequate nutrition has been and remains a persistent problem for Bangladesh despite reports that the numbers affected by malnutrition are diminishing. Nevertheless, in terms of scale, under-nutrition is an overwhelming crisis, on the border between emergency and development. An estimated 500,000 children suffer from severe acute malnutrition annually

in Bangladesh. Among children under five years of age, 48 per cent are stunted and 13.5 per cent are acutely malnourished, of which 3.4 per cent are suffering from severe acute malnutrition¹⁰. The damage caused by severe malnutrition in the early years of childhood is permanent.

It is directly related to the overarching issue of poverty together with landlessness of most of the population, which creates a lack of access to adequate food, exacerbated by monoculture and a single food diet. The prevalence of malnutrition in Bangladesh is among the highest in the world. Millions of children and women suffer from one or more forms of malnutrition including low birth weight, wasting, stunting, underweight, vitamin A deficiencies, iodine deficiency disorders and anaemia. Malnutrition, more specifically under-nutrition, affects all sections of the community but infants, young children and women of reproductive age are at greatest risk because of their proportionately higher nutritional requirements for growth, development and maintenance. Here are some facts:¹¹

Table 2: Facts on Nutritional Situation in Bangladesh:

	Bangladesh is ranked <i>FIRST</i> in the world for the number of children suffering from malnutrition¹².
	26% of the population are undernourished in Bangladesh,¹³
	Bangladesh has the lowest weight for age population in the world.
	46% of the children suffer from moderate to severe underweight problem.
	48% of children under 5 years old are stunted.
	One in five pre-school age children are vitamin A deficient.
	One in two are anaemic.
	Two-thirds of the children, under the age of five, are under-nourished and about 60% of them, who are under six, are stunted.
	More than 45 per cent of rural families and 76 per cent of urban families were below the acceptable caloric intake level.

110. **Food Security Context:**

Bangladesh's physical parameters, which determine its prospects for achieving food security, are limited. It is a broad deltaic plain with a landmass of over 147,500 sq.km and rainfall that averages at least 2,300 mm for most of the country. It falls within the flood plains of three great rivers, the Ganges, the Brahmaputra, and the Meghna, their tributaries and distributaries that add up to a total of about 700 rivers. While those river systems drain a total area of about 1.72 million square kilometres in India, China, Nepal, Bhutan, and Bangladesh, only 8% of this area lies within Bangladesh. As a result, huge inflows of water over which Bangladesh

¹⁰ Source: National CMAM Guideline. GoB Sept 2011.

¹¹ From the World Bank & UNICEF

¹² Child and Maternal Nutrition in Bangladesh – UNICEF

¹³ The state of food insecurity in the World 2011 – FAO

has no control, enter the country. The intense rainfall during the monsoon period along with (often) increased flows across Bangladesh's borders results in a scenario of annual flooding causing enormous hardship and hindering development.

111. At the same time however, the flooding lays fresh deposits of rich silt that replenish the fertile but overworked soil. A coastline of about 580 miles fissured by numerous rivers also subject the land to a recurring onslaught of cyclones and tidal waves from the Bay of Bengal. Physically, Bangladesh, therefore, represents a country with limited resources that is subject to a wide range of natural disasters.

112. **Availability & Access**

The adverse physical resources aside, Bangladesh has succeeded in maintaining steady progress in one dimension of food security – **availability**. Aggregate production has increased at an impressive rate to reach around 30 million tons per annum to attain marginal self-sufficiency. The impressive growth has been despite a very limited cultivable land mass and a very high population, estimated at about 150 million (2011), which it supports. Despite this consistent supply increase, the per capita supply of cereals has remained relatively constant. However, in the context of declining availability of land and water resources for agriculture and in view of demographic trends, the sustainability of food grain production and supply remains a major issue. In addition, the scenario for food security in the future in the context of climate change is one of serious concern.

113. Notwithstanding the improved food availability, poverty remains a major factor that acts as a barrier to the attainment of the other dimension of food security – **access**. Poor households, both food producers and non-food producers, do not have food security because they are unable to afford a minimum basket of food items through their own food production, cash income, market purchases and other resources necessary to acquire safe and nutritious food. For instance, the percentage of landlessness is estimated at around 60 % who are dependent on wage labour for their survival. Although the country has also made significant progress in the reduction of poverty, current estimates of about 30-35 % population living below the poverty line (World Bank) implies a population that is large and vulnerable.

114. Further, transitory food insecurity remains an important element in the overall picture: large segments of the population face the distress of transitory food insecurity caused by drought, floods, cyclones and other natural disasters, which, in many instances, results in highly adverse adjustments in their means of livelihoods due to lack of coping capabilities. Another element of periodic transitory food insecurity arises from the seasonal food crisis that occurs before the harvest of '*aman*' rice each year in the northern region of Bangladesh. The crisis has typically been known as '*monga*' (near famine situation), has a drastic impact particularly in the North West part of the country.

115. Additionally, with the country being placed in the bottom 25% of the Global Hunger Index ranking, that indicates that it faces a high risk in the context of food price hikes such as that of 2008 and such as is going on currently in 2012. Nationally representative household food security and nutrition survey conducted in 2008-2009, which assessed the impact of price hikes during 2007-2008, revealed that in addition to coping strategies of reduced portion sizes and borrowing money, 22% families also reduced health expenditure. The assessment also reported strong linkages between nutritional status of children and women and food security indicators related to food price hikes. Nevertheless, the retail price of rice is now 3% higher than its peak in 2008, indicating a continued risk for children and women.

116. Food Security therefore remains an elusive goal for the country. While significant advances in output have contributed to some measure of food security on the dimension of

availability, poverty remains a major factor in its inability to reach food security from the dimension of access. A corollary of this is also that under-nutrition remains a major threat to substantial sections of the population, particularly women and children

117. **Government Plans**

Food security has implicitly or explicitly been a focus of the Government's Five Year Plans, which had poverty alleviation as its major objective. With nearly 60 % of the population classified as landless, the importance of policies in ensuring food access would need to focus on managing demand as much as supporting to increase supply and production.

118. Bangladesh is perhaps one of the few countries which have put together a comprehensive framework of food security actions comprising of an initial National Food Policy (2006) focused on availability, access and nutrition and a subsequent National Food Policy Plan of Action (2008) comprising 26 areas of interventions and 314 specific actions. The establishment of a Food Policy and Monitoring Unit (FPMU) supported by USAID and the EU is overseeing the implementation of the Plan.

119. A range of safety net programme of the Government is aimed at the different risk groups. Programmes can be divided into cash and food-based transfer programmes. While the largest programmes tend to be food-based, conditional cash transfers have become increasingly important, including for improved access to schooling for children, particularly girls. These include:

- ***Cash Transfers:*** Children receive transfers to enrol in school; and the working age population has access to a variety of work-based, cash transfer programmes. A cash-transfer programme is in place to support the elderly poor. Smaller programmes provide cash assistance to other marginalised groups; and,
- ***Food/in-kind Transfers:*** Food/in-kind transfer programmes are typically aimed at the poor and are often combined with microcredit programmes designed to enable individuals to start up small businesses. Various rapid response food programmes help different groups to cope with the aftermaths of natural disasters.
- Implemented through a wide variety of line ministries including the Ministry of Social Welfare, Ministry of Food and Disaster Management and the Ministry of Women and Children Affairs, they have also included implementation in partnership with NGOs. While the coverage of the programmes are low and reaches a small percentage of the target population, studies present a mixed picture with the results of these programmes.

120. **Parameters for ECHO Intervention:**

With poverty itself acting as a major barrier, Bangladesh's susceptibility to natural disasters both in terms of variety and frequency has been a major element contributing to food insecurity for substantially large segments of the population across large swathes of the country.

121. It is during responses to emergencies that ECHO has mainly intervened in aspects of 'food security' – using the emergency as an entry point. Typical of this is the current ECHO supported WFP programme in the Chittagong Hill Tracts. This is probably the most appropriate approach for the Commission as an emergency donor, because it is usually the very most vulnerable/marginalised parts of the population who are affected and who therefore need food. Emergency responses are, however, necessarily short-run stopgap measures that

attempt to restore the individual to his original status and coping ability but do not substantially change his vulnerability.

122. **Sustainable food security needs to be perceived from a wider perspective.** It is based on measures that assist, change and increase the productive potential of the individual and/or his income earning capacities. As an emergency donor, ECHO's mandate does not typically support the sort of interventions in food security that require substantive long-term application. Nevertheless, the impact of measures introduced during emergency response could gain much greater traction in food security in the longer term if they can be integrated into the continuum of relief, rehabilitation and development (LRRD). Substantive measures taken to address food security should be considered by linking ECHO's emergency programme to EU's thematic programme support for food security.

123. **Nutrition - Seriousness of Nutritional Situation in Bangladesh¹⁴**

At a visit to a health clinic in Tala Upazila, Satkhira where ECHO's implementing partner, ACF, was supporting a nutrition programme, the team found that an average of 5 out of 50 patients daily were U5 children suffering from malnutrition. This is 10 per cent of one very small part of the country. Bearing in mind the size of the population even in the marginal areas where malnutrition is most likely to be found this, instant and obviously unscientific, snapshot would represent a significant problem nationally. In respect of nutrition whatever amount of funding ECHO allocated would be inadequate to deal with such a massive issue both within Bangladesh and regionally. Not only that, but the problem is chronic and nutrition programmes such as the ACF programme supporting the government run health clinic are likely to continue for a long time. Furthermore, the problems of nutrition are not exclusively related to lack of food, (as shown earlier, from a national point of view, Bangladesh has statistically achieved self-sufficiency) although this is one of the factors, but as found at the health clinic in Tala Upazila, they are also caused by water borne diseases, by dysentery, and by single food diets. Malnutrition therefore requires a holistic approach over a long period of time – more suitable to sustainable development programmes rather than short-term emergency interventions. As they currently do, therefore, the Commission has to adopt a more selective and prioritised approach finding the appropriate entry and exit points and at the same time maintaining readiness and awareness of how serious an issue it could become.

124. ***A Major Health Problem:*** Under-nutrition has been and continues to be a serious public health problem in Bangladesh. Although malnutrition rates have seen a marked decline in Bangladesh throughout the 1990s, they have remained high at the turn of the decade. The incidence of under-nutrition among children and pregnant and lactating women is acute and warrants urgent action. (See statistics in Table 3, below.) Underweight prevalence decreased slightly between 2004 and 2007. Of greater concern are the rates of wasting that increased over the same period reaching 17.4 %, exceeding the WHO emergency threshold level (15%), which indicates an urgent need for action. These rates are some of the highest in the world and these children are at risk of death or severe impairment of growth and development.

¹⁴ Data obtained from:

1. Statistical Yearbook of Bangladesh, Bangladesh Bureau of Statistics, 2004
2. Bangladesh Demographic and Health Survey, 2007
3. Helen Keller International / Institute of Public Health and Nutrition, 2002
4. Child and Mother Nutrition Survey of Bangladesh, 2005
5. Nutrition Surveillance Programme; Helen Keller International / Institute of Public Health and Nutrition, 2005
6. Bangladesh Iodine Deficiency Disorder / Universal Salt Iodisation Survey, 2005

Table 3: State of Nutrition in Bangladesh

NUTRITION	% OF POPULATION
Malnutrition, in children (birth to 59 months):	
Wasting (weight-for-height)	17.4
Stunting (height-for-age)	43.2
Underweight (weight-for-age)	41
Low birth-weight	36
Exclusive breastfeeding (birth to 6 months)	43
Anaemia, in children (6 - 23 months)	64
Chronic energy deficiency, in mothers	32
Night blindness (Vitamin A deficiency), in children (18-59 months)	0.04
Iodine deficiency, in children (6 - 12 years)	33.8

125. Despite the substantial gains in the broad area of nutrition, much remains to be done. In Bangladesh, over one-third of the babies (36%) are born with low-birth weight (<2.5 kg), nearly three-quarters of which is caused by maternal under-nutrition during pregnancy (BBS/UNICEF, 2005); nearly half (45 per cent) of the women of reproductive age suffer from chronic energy deficiency (CED). Unlike children, the nutritional status of women in Bangladesh however shows a better trend. In 1997, 52% of women had chronic energy deficiency, defined as body mass index <18.5 kg/m². Ten years later, there has been a sustained reduction in prevalence of chronic energy deficiency (30% in 2007). **Government Plans**

126. Nutrition interventions have been largely supported by the Government, but possibly without adequate coherence and without being able to concurrently address the problem of poverty, or even the other issues that contribute to malnutrition such as water and sanitation (although UNICEF is engaged on a major project together with the government to improve access to potable water). Some other agencies, such as the Helen Keller International (HKI) have also undertaken projects such as the Surveillance Project, in cooperation with the Government, while others, such as Action against Hunger (ACF) and WFP have undertaken specific spot programmes. Nutrition plans of the Government have gone through considerable evolution over the last two decades. Currently there are three major programmes under implementation: the institute of public health nutrition programme (IPHN), the Micronutrient Supplementation (MS) and the National Nutrition Programme (NNP). The IPHN and MS work under the Directorate General of Health Services (DGHS) and the NNP works directly under the ministry. The programmes of IPHN and MS cover the entire country. The coverage of NNP through community nutrition centres on the other hand, is far more limited. The target populations of NNP's nutrition programmes are: (a) under-2 children; (b) pregnant and lactating mothers; (c) newly married couples; (d) adolescents boys and girls; and (e) in-laws and (f) husbands of pregnant women. The latter two target groups are for advocacy. The services include nutrition supplementation of malnourished children and all pregnant and lactating women; monitoring weight of under-2 children and pregnancy weight gain; training; behaviour change communication; and food security interventions through vulnerable group feeding as well as through encouraging people for homestead gardening and poultry farming.

127. A growing body of evidence, however, reveals that targeted interventions for children and pregnant and lactating mothers have a distinct impact even in the short run, as a consequence of which an alliance of national and donor agencies (UN, World Bank, USAID and several national Governments) have joined in establishing the 1000 day programme of nutrition for children and pregnant and lactating mothers.

128. **ECHO Response**

ECHO Response. ECHO's response to nutrition has been at two levels: first, the immediate provision of food for survival in the event of an emergency (e.g. Rodent Infestation in Chittagong Hill Tracts) for varying periods, which has been the norm for almost all the programmes. Second, it has included providing targeted support for under nourished children under the age of 5 years of age and pregnant and lactating women (e.g. ACF programme in Rohingya Refugee Camps). Although a part of the emergency response, nutrition interventions were based on exhaustive surveys in specific geographic areas, which have also included community mobilisation and involvement. Programme support was targeted specifically for children suffering from globally and severely acute malnutrition (GAM and SAM) and whose situation was determined as critical with the application of WHO parameters.

129. The response included interventions ranging from enrolment in therapeutic feeding programmes (TFP), supplementary feeding programmes (SFP), outpatient treatment programme (OTP), ready to use therapeutic food (RUTF, known by the brand name of 'plumpy-nut') as well as the provision of family food protection rations. The most intensive nutrition support programmes were in the Rohingya refugee camps, implemented by Action Contre La Faim (ACF) in partnership with Muslim Aid as well as MSF (Médecin Sans Frontières). Nutrition interventions in other areas such as in the Chittagong Hill Tracts or in the water-logged areas in Satkhira were less intensive and included supplementary feeding and the provision of RUTF. The interventions were supported by a considerable degree of nutrition screening, monitoring and surveys. In most cases, nutrition interventions were combined with programmes for increasing household based food production such as vegetable and a robust WASH programme focused on protecting and improving drinking water supplies and the construction of sanitary toilets.

130. While nutrition interventions have largely been included as a component in response to a disaster, the pervasive nature of malnutrition in Bangladesh (stunting and under-weight) provides a strong rationale for addressing it through direct and substantive measures in and of itself. The incidence of wasting, often referred to as a silent emergency in Bangladesh are at levels that warrant emergency interventions in its own right. It is this recognition, particularly of the inter-generational impact on human development as a consequence of stunting that has created a worldwide momentum now increasingly being addressed by donor agencies. Nevertheless, the malnutrition in Bangladesh would have to be tackled by long-term, sustainable programmes – ECHO's interventions would be to address serious spikes in a chronic situation.

5.8 Humanitarian Coordination in Bangladesh:

131. **Context:**

An important and overarching element of humanitarian support in Bangladesh is coordination. It is important not only because the country has a history of recurring disasters but also because since its birth in 1971 it has attracted numerous national and international humanitarian agencies with different kinds of assistance, approaches, and mandates – often

with overlapping objectives and at times duplication of assistance. Without effective coordination there is a danger that not all the most affected parts of the population receive the support that they need and that donors funding is not most efficiently used. Good coordination, on the other hand, has a multiplier effect, enhancing the humanitarian aid that is provided. Coordination is a common thread that runs through all the humanitarian programmes and it was looked at by the evaluation, although they were not able to discuss it in any considerable detail with one of the most important bodies in coordination; the government.

132. **Work done by the Evaluation Team during the Field Mission:**

As well as the work done during the ‘desk study’ phase of the evaluation, the evaluation examined aspects of humanitarian coordination throughout the field mission. This was achieved by discussing and observing coordination issues with ECHO Bangladesh; most of the implementing partners; with government officials at a local and national level; with local NGOs; with beneficiary groups and other focus groups. The issues were also extensively covered in a final debriefing meeting with all concerned organisations and their 27 representatives in Dhaka.

133. **Main Issues:**

- ◆ ***Absence of Coordination Systems:*** Within humanitarian coordination in Bangladesh the absence of systems and structures had long been a problem both at government level and amongst the humanitarian agencies. There is an indication of some progress: from the central government perspective some of the systems have now become activated (partially in line with the Hyogo Framework of Action Agreement) and law is being finalised (waiting for endorsement of parliament) passed to underline this.
- ◆ ***Good Coordination, Bad Coordination, & Haphazard Coordination:*** Not all the coordination was bad – mainly it was not consistent or formalised, very often resulting in overlapping or inefficiency, especially, for example, concerning humanitarian needs assessments. Main area of concern both with the Government and with the INGOs is between HQ level and field/sub district/Upazilla.
- ◆ ***Some coordination mechanisms not evident*** – for example in the event of a disaster there appear to be no clear coordination mechanisms between humanitarians and the military, or for that matter between other government bodies and the military. The systems are only activated when there is a major national emergency – by which time it is too late to correct any deficiencies,
- ◆ ***Importance of coordination, ownership, sustainability at community level:*** ECHO’s programmes have played an important role in building awareness of coordination mechanisms,
- ◆ ***Humanitarian Coordination Imposed on Government bodies,*** In past disasters, the government, local bodies, local NGOs feel that they have had coordination systems imposed on them by the humanitarians with little thought given to existing national coordination systems. They felt a lack of ownership in the humanitarian systems, which led to poor coordination between government bodies and the humanitarians. It is anticipated that this will be resolved by the ‘cluster’ system – something that the Government has already used as a model for its coordination mechanisms. In an emergency, the government says that ***‘they provide 95% of the assistance, but the humanitarians make 95% of the noise’***. This obviously reflects a gap between the groups

and a lack of complementary roles as well as mutual appreciation of each other's contributions

- ◆ ***Cluster System: Humanitarian Coordination improving*** with the ECHO funded presence of a humanitarian affairs officer from OCHA, with the introduction of the 'Cluster System' and with the positive measures that the ECHO office in Bangladesh had taken in the past and was currently taking.
- ◆ ***'Standardisation of Package'***: There has been more work in coordination, within the humanitarian community on 'standardising the package', i.e. making the delivery of aid more consistent amongst all those involved
- ◆ ***Some effective coordination as a bi-product of the Consortia system*** and as a consequence of the partnership system between INGOs and local NGOs – however see section on coordination issues concerning local NGOs.

134. **Background:**

Lack of coordination in terms of systems, structures and procedures to provide effective humanitarian assistance in Bangladesh has long been a problem. Wastage, duplication, and mismanagement of resources allocated for the purpose have been a matter of concern for the national leaders as well as the external donors and humanitarian agencies as well as those directly affected by any disaster. In order to make delivery of assistance for response and preparedness effective and cohesive, many initiatives have been undertaken over the past two decades – with mixed results. After the 1987 and 1988 floods and the 1991 cyclone, the Government of Bangladesh (GoB) started to reconsider its role in humanitarian response and disaster management. In 1993, the Ministry of Relief was renamed the Ministry of Disaster Management and Relief (MDMR), and a Disaster Management Bureau (DMB) was set up alongside the Directorate for Relief and Rehabilitation (DRR), with active support from donors (UNDP and UNICEF). MDMR was small and generally regarded as one of GoB's weaker ministries, although DRR always attracted political attention due to its role in distributing large quantities of food aid and other assistance. It also had responsibility for other issues like refugees.

135. For a long time, the functions of DMB remained feeble, uncertain and limited to providing training to officials and local elites on disaster management and helping the creation of local Disaster Management Committees (DMCs) and Local Disaster Action Plans (LDAPs). The absence of a strong government coordination mechanism or a well developed system for emergency response was strongly felt by all concerned – affected populations and humanitarian agencies, particularly after the protracted and devastating 1998 floods when about two thirds of the country was inundated for over a month. Since then, significant progress has been made in the humanitarian coordination sector with the establishment of different policies and structures as discussed below. It was not, however, until the middle of the 1990s that the government policies and planning begun to reflect the link between disaster impact and the vulnerability of a section of poorer population groups. In its fifth five-year plan (1997-2002) little attention was given to disaster management, with only brief references to flood management in the water resources section. A study on vulnerability was commissioned in preparation for GoB's Poverty Reduction Strategy Paper in 2003. Since poverty is integrally linked with food insecurity, the Ministry of Food (and Agriculture) was re-constituted and linked with the Ministry of Disaster Management and Relief – to form the present Ministry of Food and Disaster Management (MoFDM). The Directorate of Relief and Rehabilitation (DRR) and the Disaster Management Bureau (DMB) forms the two key wings of the Disaster Management and Relief Division of the MoFDM.

136. A National Policy on Disaster Management¹⁵ and a Disaster Management Act (recently approved by the Cabinet of Ministers in June 2012) and a 'Plan'¹⁶ to implement it has been prepared. GoB's Disaster Management Bureau has produced Standing Orders on Disasters, which specify the roles of all parts of national and local government in responding to and preparing for disasters. These are widely disseminated but only partially implemented¹⁷. A number of different committees at different levels have been formed to coordinate humanitarian response. Most important among these are considered to be the one at the top (NDMC) and the one at the bottom (UDMC) of the hierarchy for obvious reasons of their link with the highest policy makers of the country and people at the grassroots.

137. Elusive Coordination and the Value of ECHO Interventions

The National Disaster Management Council (NDMC) exists to formulate and review disaster management policies. It is headed by the Prime Minister and **rarely** meets. The Inter-ministerial Disaster Management Coordination Committee (IMDMCC) is chaired by the Minister for Food and Disaster Management and is usually convened when a big disaster strikes the country. The coordination function of MoFDM is supplemented (and allegedly undermined, at times), by the active involvement of the Prime Minister's Office (PMO) and the Armed Forces Division (AFD) following major disasters. These elaborate structures and procedures mostly remain dormant and are often caught unawares during sudden onset disasters and humanitarian crisis. This is possibly because there has not been a thoughtful 'peace-time' activity programme for these committees but whatever the reason it is a major disadvantage in humanitarian coordination, especially for the international or non-government humanitarian agencies who when a big emergency occurs are not familiar with the government coordination mechanisms.

138. **CMCoord:** The elements of the military involvement in civil military coordination as a primary responder have been taken into account by the UN OCHA HAO attached to the Resident Coordinator but by himself he is only making limited progress. Concurrently an officer within the Bangladesh military council has been appointed to examine the issue and is trying to promote active involvement but has also met with limited interest. It is important, however, from the point of view of coordination that there is a greater liaison with the military. It is not even known, for example, whether a military response is integrated into plans for a major disaster; whether they are part of any 'mass casualty management' (MCM) strategy.

139. At the other end of the spectrum, the *Union Parishads* (UPs) play a significant role in local disaster management activities, particularly in the distribution of relief at local levels. UP chairmen and members draw up distribution lists and supervise the final allocation of food which has been stored and transported by the Public Food Distribution System (PFDS). Politicisation of relief delivery and leakage (which also includes non-food items) at local levels had been a major problem. In order to address these problems, DMB has encouraged the formation of Disaster Management Committees and drawing up of Local Disaster Action Plans (LDAPs) at Union, *Upazila* (sub-district) and District level. During the late 1990s and early 2000s, hundreds of LDAPs had been prepared in many districts, *Upazilas*, Unions and

¹⁵ Government of the People's Republic of Bangladesh, Ministry of Disaster Management and Relief: *National Policy on Disaster Management* (drafted first in February 2000).

¹⁶ GoB 2010. National Plan for Disaster Management 2010-2015, Disaster Management Bureau, Ministry of Food and Disaster Management.

¹⁷ GoB 2010. *Standing Order on Disaster*. Disaster Management Bureau, Disaster Management and Relief Division, Ministry of Food and Disaster Management.

pourashavas (municipalities) of the country with enormous costs – only to see them become useless and ineffective in times of need. Because, these plans have been prepared by consultants with little participation in their formulation from the local people they have soon become out of date, inappropriate and thus irrelevant. Moreover, the local government officials and elected representatives had no budgets or resources to implement local disaster action plans.

140. ***Comprehensive Disaster Management Programme (CDMP)***: An adjunct of the MoFDM is the Comprehensive Disaster Management Programme (CDMP). An important and effective form of coordination at a strategic level comes through the work of the CDMP, which is a programme (supported by UNDP and the EU Delegation among other donors) designed to strengthen, advise, and support DRR in Bangladesh by working with the relevant government bodies. Although a significant function initially has been to advise the government in DRR it has an essential role in coordination, particularly in working with committees at National, District and Local levels.

141. Thanks to CDMP, a particular model of community risk assessment (CRA) has been developed – a process that follows development of risk reduction action plans (RRAP) – to undertake different emergency preparedness activities. Developed by the community following a participatory (PRA – Participatory Rural Appraisal) approach, these plans are often very thorough and realistic. Lack of organisation and resources, however, at the local level has meant that many of these action plans do not see the light of implementation. This is where the importance of ECHO supported programmes, particularly those under DIPECHO, come to the fore because they have very appropriately chosen to work around these structures, i.e., the DMCs formed at Union and *Upazila* level and help them develop/implement their RRAPs.

142. ***ECHO Interventions & The ‘Rights-Based’ Approach***: The ECHO sponsored community level interventions are partly filling in the resource gap by providing limited funds to repair embankments, roads, developing demonstration rain water harvesting plants, and introducing small study projects on disaster management for high school children and communities, but an important element of the project is the **‘rights based’ approach** to programming of such action plans for some community groups (e.g., Women’s REFLECT Circles). This has been helping to sensitise people to their basic rights as well as spurring different government institutions at local and national level responsive towards meeting their needs. Indeed, it was heartening to observe during this evaluation that some of the local institutions, which had long suffered from inaction and neglect, are being mobilised effectively by different ECHO interventions.

143. **Sustainability of Local Level Coordination**

The question of sustainability of these efforts looms large when one considers an end of this external intervention. Will the community groups continue to be together to plan and undertake community actions in the manner they have been doing now? What is the future for CBOs formed in the absence of NGO supervision and follow up? What will be the alternative sources of resources for them to build expensive road and WATSAN infrastructures? Will the groups of older persons and people with disability survive without NGO help?

144. The important point, however, is that the development workers of INGOs and their local partners are aware of these issues. They have explained how these challenges are being dealt with in the finite project life. The community groups have had the short duration of current interventions clearly explained to them, and their expectations from these are being carefully trimmed and shaped. It is hoped that the coordination mechanism will continue to remain

effective because these are linked with government designated public bodies and they do not need much funding to continue.

145. ***The impact of the ‘rights-based’ approach and the importance of community involvement:*** The ‘rights based’ programming approach has taught the people how to make effective demands of the services due to them, while the responsible institutions have been made aware of their obligation to the people. As a result, institutional response in this regard has already been encouraging. As a growing economy, Bangladesh should not have resource constraints in future for the kind of work currently undertaken by donor assistance; provided that its governance practices are improved with enhanced level of transparency and accountability. However, when the evaluation team spoke with the beneficiaries – knowingly or unknowingly, they all decided to ignore our independent role and asked us to see that the current level of donor support had continued!

146. One of the great advantages of the way in which the ECHO projects are implemented is the positive involvement of the local communities – through CBOs, schools, local officials, the disabled and the elderly, creating a sense of ownership that enhances coordination and goes a long way to becoming self sustainable. The spirit of togetherness to resolve developmental problems built over many years of community development efforts undertaken by NGOs has ensured that it is not solely the material deprivation that people are concerned by or even most anxious about. They have now learned to cast a distant view on their future, for themselves, as well as for their children. That is why we now observe more disciplined distribution of relief assistance, more focus on children’s health and education, prioritising assistance for disabled and aged people, expressing concern about environmental degradation by capitalist speculators and focusing on preservation of natural resources.

147. **National level Coordination**

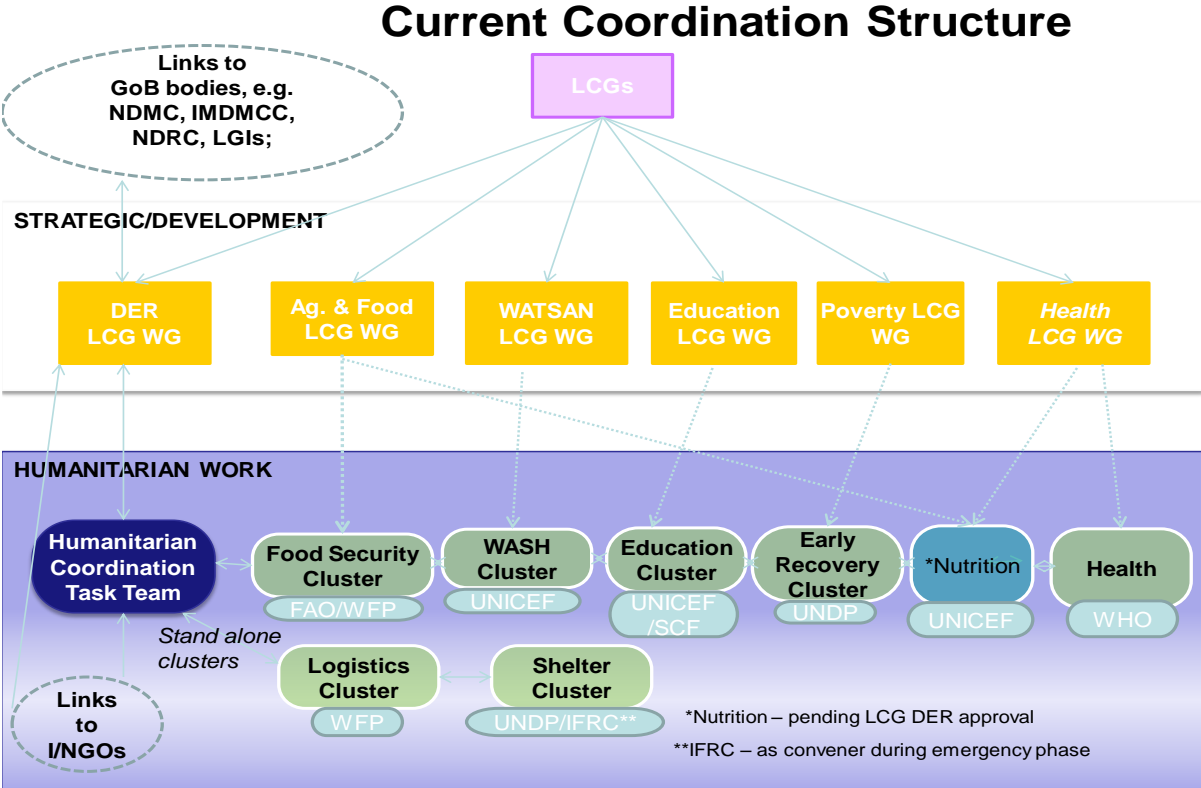
The Government’s mechanisms for coordination of both disaster response and wider disaster management have generally been improved over the years. Yet, despite elaborate structures and processes developed for the purpose of coordination, the issue remains elusive as ever. As an example, this is reflected in the ambivalent role of the armed forces during and before the emergencies. It is also evident that there is a lack of inter-ministerial coordination during the time of emergencies, while the role of members of the Parliament (MPs) during the time is sometimes regarded as ‘unfair interference’ because of their party bias. Politicisation of relief distribution has been seen as a chronic problem that discriminates people by their allegiance to particular political groups. At meso level, Deputy Commissioners (DCs) and their Union Nirbahi Officers – executive officer (UNOs) try to promote coordination of response, but have limited capacity and are often seen to be working with donor-funded organisations with different agendas.

148. **Cluster System:**

Although, there has been a general level of improvement in coordination of humanitarian responses among the government and donors, in the absence of a working model of a central coordination mechanism, the improvement stutters and there are still coordination issues for the humanitarian agencies – UN and International NGOs. Thanks to strong advocacy on the part of ECHO and other donors in the aftermath of cyclone AILA, and a general awareness by the humanitarians of the inconsistent coordination mechanisms that existed in Bangladesh, OCHA seconded a Humanitarian Affairs Officer to the office of the Resident Coordinator at UNDP Bangladesh to set up the ‘cluster’ system for humanitarian coordination. Having only recently been started, it is too early to judge how successful it is – something that will

probably only be measured in the next disaster. It is, however, beginning to reap benefits as 6 clusters have become activated, and it is accepted and being used as a model by the government as a model for enhancing their coordination mechanisms. The clusters are directly linked to the line ministries working groups, which creates significant involvement of the government and should counter some of the perceptions that coordination is imposed on them.

Digram 1: Current Humanitarian Coordination Structure in Bangladesh – The Cluster System



149. This ‘cluster’ system as adapted for Bangladesh, however, is unusual in that it is intended to be fully operational all the time, i.e. not just activated for emergencies, and because there is no exclusion of the government, although at the moment this does not embrace the military, who in a major emergency would be one of the most important responders. The ‘cluster’ system has been modified to work in an environment that is mostly ‘early recovery’/development focussed. Although it is in its early stages of evolvement it will need to be constantly reassessed for effectiveness. As with all cluster systems much depends on the involvement of the cluster members, on the leadership, and on the inter cluster coordination as well as the intra cluster coordination. There are, currently, seven operating clusters and one, ‘nutrition’ in the pipeline. The government has categorically rejected one potential cluster – protection – although most humanitarians would regard this as one of the most important. The government considers, possibly correctly but not necessarily for the right reasons that this issue should be central to all clusters. Some of the clusters have been working well already, particularly the food security cluster. Inter cluster and overall coordination is taken care of by the Humanitarian Coordination Task Team (HCTT). ECHO is heavily involved in the ‘cluster’ system and is a member of the HCTT.

150. The cluster system will hopefully improve humanitarian coordination and it is already becoming more coherent but there are some cautions:

- **Government involvement, development slant:** This cluster system has evolved in such a way that it a) involves the government considerably, and b) it has a strong development outlook, but it has not been tried in an emergency environment and in such cases different forms of coordination are often needed. It has been shown, for example, that the cluster mechanism in place in Pakistan to address the complex emergency caused by the internal strife was not well suited to tackle the sudden onset natural disaster of the 2010 floods, although this was in part due to the ambivalent role of the Pakistan military. Whilst it can serve as an important base for humanitarian coordination, it is important that it can be adjusted to become a major coordination mechanism in a big emergency in conjunction with the state mechanisms, including the military.
- **Working with the consortium system?** It is also not clear how the cluster system will work in conjunction/parallel with the consortia system (see below), and whether or not the consortia system does not overlap with the cluster system or whether there will be too many coordination mechanisms leading to confusion. This, obviously, requires clear definitions of roles and responsibilities for each of the different structures in place, including those mentioned in the government’s SOD (Standing Order on Disaster).
- **Outreach:** There is also concern as to the extent that the cluster system can be decentralised. Currently it is operational centrally in Dhaka but it is very important, especially in the case of a major emergency that macro-coordination works, lest local level initiatives lose momentum. In the same context for all these systems to be ready in an emergency they a) have to be working before an emergency, and b) have to be sustainable, which in turn means that there has to be local involvement.
- **Needs Assessments:** A major factor, for the cluster system, will be in improving humanitarian coordination will be in rationalising ‘needs assessments’. A step towards this seems to have been taken – see example 2, above. Once again the perspectives of various different bodies, the affected communities, the government at national and local levels, local NGOs, international NGOs, the consortia, and the donors will all have to be brought into a uniform approach.

151. Needs Assessments:

Example 5: Improving coordination demonstrated in ‘Needs Assessments’

The problems of coordination and the fact that it is, nonetheless improving is illustrated by the following example:

In the immediate aftermath (within 48 hours) of Cyclone AILA, **27 separate needs assessments** were conducted by the same number of individual international aid agencies (and does not include government assessments or assessments carried out by non humanitarian agencies) most of which were never published or shared.

Two weeks before the evaluation team arrived in Bangladesh in the aftermath of the severe flooding in the South East of the country it was necessary to assess the humanitarian situation. **In this case only one assessment was conducted in which 58 NGOs and aid agencies** were represented together with the government – the findings of which assessment were generally accepted by all the aid agencies and the government

152. As mentioned above a vital function of the ‘cluster’ system will be to rationalise ‘needs assessments’. ‘Needs assessment’ is an issue that was looked at by the evaluation, although it was not possible to see needs assessments being conducted in situ. The overall impression of the evaluation from several discussions was that:

- a) There was an awareness that ‘needs assessments’ needed to be rationalised,

- b) That whilst there were improvements in the approach to ‘needs assessments’ they appeared to be very much **process** orientated rather than **outcome** orientated – many long time-consuming assessment forms to be filled in,
- c) There have been strong efforts on the parts of the humanitarian agencies to make the assessments as inclusive as possible – i.e. community involvement, and the formulation of community groups and CBOs has helped this,
- d) Needs assessments have, nevertheless been innovative enough to discover new ways of delivering support, i.e. the cash/food balance distributed to the affected population in the CHT.
- e) Some elements of needs assessments are determined by the donors, which can sometimes have a negative impact – such as the way in which the implementing partner may be channelled in certain directions by the methodology for the submission of the bid, i.e. the format of the submission form, which very often focuses on ‘output’ and cost efficiency measures rather than ‘outcome’
- f) Government’s assessments and the humanitarian agencies, in the past, had widely varied, but the government is adapting its approach,
- g) ECHO’s projects, nevertheless, have managed to target the most needy.
- h) The newly introduced ‘cluster’ system should go a long way towards ensuring that needs assessments become more coherent and this has recently been demonstrated by the joint needs assessment that was conducted recently in the aftermath of the floods in the South-East of the country.

153. Nevertheless the approach towards needs assessments requires consolidating and in this ECHO can be a strong advocate. In addition ‘needs assessments’, as they are used at the moment, are fine for addressing what is required in a sudden onset emergency but in Bangladesh, there also has to be a more comprehensive approach towards assessing needs after the emergency, to decide what the impact of the aid has been both in the immediate aftermath and the longer term and to monitor needs continuously during chronic emergencies or define needs for a longer term approach. Needs assessments therefore, in Bangladesh, need to develop beyond linear methodology and there should be greater coordination not just amongst humanitarian agencies, but also between humanitarian work and development work, between international agencies, donors, and government developing a more holistic approach that will fit well in to a ‘transition’ system. To an extent ECHO Bangladesh is already aware of the need for this and there is much dialogue between ECHO and other instruments of the Commission, between ECHO and its implementing partners towards achieving a more integrated system for ‘needs assessments’.

154. **The Consortium System & Humanitarian Coordination:**

The adoption of the consortium system (introduced for DIPECHO projects), acts as a useful coordination mechanism as well as its other benefits, although it is not clear how it will work in conjunction with the ‘cluster’ system (see above). One of the major benefits of this system is that, for ECHO it provides a single standard ‘package’, single transaction costs and therefore, in theory economies of scale (although this aspect of cost efficiency has not been fully assessed and the evaluation team saw no figures that demonstrated this one way or the other) and it also means that the management of several projects with limited resources is greatly reduced. It also provides a unified front and greater geographical coverage. It could, however, be argued by the UN aid agencies, that they, in effect, provide the same system with

the 'cluster' system or a large NGO with capacity could also do the same, although the consortia were introduced by DIPECHO in Bangladesh long before the 'cluster' system.

155. The consortium system is well adapted to the slower moving pace of development projects where there is less of the urgency to make a quick decision as there would be in an emergency and one problem for ECHO who also expects the NGOs to be able to respond to an emergency is that they may be slow to do so, because they need to reach a consensus amongst the consortium members. In the case of some of the ECHO projects it has been as long as two months.

156. Major advantages, however, of the consortia in an emergency and once again in terms of coordination are that they have vastly increased outreach, large pools of expertise and experience and that by providing a 'standard package' they will a) become more systematic in targeting and b) cover all gaps and most needs. Although there is a potential problem with the need for consensus and therefore the potential time delay, they regard themselves as less bureaucratic than the 'Cluster' system.

6. Conclusions and Recommendations

6.1 Conclusions

6.1.1 Conclusions on DG ECHO's response to natural disasters

ECHO's emergency response programmes are necessary in Bangladesh because of the vulnerability of Bangladesh to disasters and because ECHO has the flexibility to respond to crises big or small. They are appropriate, and life saving both in the short term and in the medium term, as well as being innovative and well thought out. For example, ECHO Bangladesh and DIPECHO encourage DRR actions through 'rights based' approaches rather than specifically 'needs based', (although these, of course, are part of the projects) supply oriented approaches. Another example of appropriateness is the use of a balance between cash and food in responding to crises such as the rodent infestation in the Chittagong Hill Tracts, utilising WFP experience in the country. The suitability of this approach appeared to be effective for the affected population as the people on the ground did have no major complaints. The evaluation found that the programmes have been timely had impact and were efficient. The efficiency of the resource and community mobilisation is potentially an effective sustainable measure that could fit well as part of an LRRD strategy. ECHO, in difficult circumstances, has also recognised the necessity of dynamic and flexible response to changing needs in humanitarian crises, striving to ensure predictability and flexibility in funding to United Nations agencies, funds and programmes and to other key humanitarian organisations – once again fulfilling an important element of 'good donorship principles'

6.1.2 Conclusions on Rohingya Crisis:

157. **Pragmatic Approach:** The evaluation considered that ECHO is not only 'humanely' correct to address this crisis but that the strategic approach is also rational. The evaluation also commends ECHO for many of the positive initiatives that it has taken in respect of the Rohingya Refugees. Given the extent of the problem ECHO has chosen to:

- **Target the very most vulnerable sections of the Rohingya Refugees** displaced in Bangladesh – those living in the makeshift camps, which is realistic given that ECHO funding cannot cover all the Rohingya Refugees.
- **Engage in advocacy** through the Head of the EU Delegation and through the NGOs who are their implementing partners. The fact that MSF/H accepts 'institutional' funding from ECHO is partly because they see ECHO as an unbiased strong international advocate. This is an important aspect of the approach to the Rohingya Refugees and complements the funding provided for their direct assistance,
- **Support their implementing partners, by advocacy** on their behalf – when the Government of Bangladesh puts pressure on them to discontinue. This is an important element to ensure that the Rohingya Refugees continue to be supported.
- **Complement the Delegation Strategy** – who whilst ECHO provides support for the refugees in the makeshift camps, provides funding for UNHCR for the registered refugees in the official camps.

158. **Prognosis:** The problem, in the future, for ECHO is twofold. On the one hand there is a humanitarian imperative – UNHCR says that without the intervention of the aid agencies and donors there would be a severe humanitarian crisis and that the Rohingya Refugees are also far more susceptible to any other disasters that affect Bangladesh – especially to the grave problem of nutrition. On the other hand, despite the changing attitude of the government of

Myanmar, there is nothing to indicate that the predicament of the Rohingya Refugees will be resolved quickly, and at the same time, the attitude of the Bangladesh towards the refugees does not appear to be changing either.

159. ECHO is therefore, as an emergency donor, (albeit one that is involved in funding many long term refugee situations – e.g. Tanzanian refugee camps) liable to become locked in to a long-term humanitarian ‘forgotten’ crisis. The humanitarian imperative demands that the problem is addressed with humanitarian aid, but the only sustainable solution leading towards stability has to be achieved through political solutions and the use of longer-term support more suited to development instruments of the Commission or other donors.

160. The Rohingya Refugees not only require immediate assistance from ECHO, but will also require aid well into the distant future. Their needs should, therefore, be considered in the context of a LRRD/Transition strategy, where, ECHO provides the emergency assistance but also acts as a platform from which longer-term instruments can launch their programmes currently impossible given current GoB attitudes. Currently this approach is challenging, because it would also involve the collaboration of GoB. Long-standing attempts have been made, throughout 2011, to persuade the government to accept a \$33 million United Nations joint initiative (UNJI) for Cox’s Bazar District, in an effort to achieve sustainable progress through development aid. Earlier this year the UNJI was finally rejected by GoB due to their concern that the Rohingya Refugees could possibly benefit from the initiative.

6.1.3 Conclusions on LRRD

161. ECHO’s approach to LRRD should be determined by, whether, although there is a chronic and enduring nature of humanitarian aid but concurrently there is a constant need for emergency support, they should remain in Bangladesh to effectively do what they are doing now, which is to quickly and flexibly respond to humanitarian crises big and small or whether they should be robustly engaged in a strategy to hand over to longer term development agencies – ‘Transition’/LRRD.

162. There is little doubt that currently in Bangladesh there is a humanitarian imperative and ‘forgotten crisis’ nature to the humanitarian situation, with the potential for major disasters as well as the silent but deadly situation with malnutrition. If humanitarian assistance in Bangladesh is seen as a constant need and at the same time there is sufficient stability within the country to implement long-term development programmes then an LRRD strategy for ECHO should be defined even if it does not follow a linear process.

163. The forms of LRRD occurring in Bangladesh at the moment, such as the coordination between ECHO and other instruments of the Commission through the Delegation such as the IfS and FSTP and AUP, whilst not clearly articulated as a policy to ECHO’s partners, fulfils efforts to implement LRRD. Although this may not be clearly stated to implementing partners it might be because most of the agencies involved in aid, including ECHO’s implementing partners, are broadly speaking development agencies and mainly engaged in, at the least, ‘early recovery’ and mainly durable development projects. They do not, therefore, feel the need to tackle LRRD as a separate strategy.

164. The DRR programmes implemented by DIPECHO and through the emergency response programmes of the Commission combine material assistance with a ‘needs based’ approach, which in turn gives greater awareness over the long term to the affected population and by making them aware, helps to spur local government into action. The material approach i.e.

such as the raising of foundation levels of houses in flood affected areas such as seen in Khulna district as well as being a DRR strategy is a form of LRRD

6.1.4 Conclusions on Food Security and Nutrition:

165. ***Large scale problem:*** Despite the principle of ‘humanity’ which requires humanitarians to intervene wherever there are cases of need, and despite the grave situation in Bangladesh in respect of nutrition and food security, the problem, although approaching emergency humanitarian levels, is on such a large scale that only a coordinated long-term approach prioritised and sustained by the government with support from durable development aid can solve the issues. ECHO interventions will, nevertheless, remain a critical factor for addressing the ‘spill-over’ by providing short-term food assistance interventions in an emergency by virtue of ECHO’s speed of response and flexibility.

166. ***Involvement of local government:*** From the specific perspective of food security, ensuring sustainability, greater effectiveness and impact in the rehabilitation of physical structures must involve local government agencies, (i.e. union Parishads, Upazila, and district) with ***the objective of leveraging resources*** from existing Government allocations (block grants to Ups by local Government Division, LGD). For instance, the rehabilitation of an embankment cum road under ECHO was assisted with resources from the UP to make it an all weather road (by brick soling). In addition, local level project implementation committees must undertake to commit themselves to day-to-day ***monitoring and maintenance of rehabilitated structures after project implementation***¹⁸.

167. ***LRRD:*** For an emergency donor such as ECHO and for all those agencies involved in nutrition and food assistance in Bangladesh there has to be a coherent LRRD strategy, whether, in the case of ECHO, it means greater linkage between themselves and other instruments of the Commission, or whether it means linkage with other long term development aid donors. Of particular interest in this respect would be the food security thematic programme of the Delegation.

168. ***Addressing WASH?*** Although the evaluation did not have sufficient time to fully investigate this aspect, it is clear that some of the causes of malnutrition can be attributed to the poor state of WASH. A combination of polluted water¹⁹ and endemic water-borne diseases aggravated by limited latrine facilities (despite claims by the government that 56% of households in Bangladesh have access to latrines). During the evaluation’s field visit, for example, it was found that many of the schools did not have adequate WASH facilities, and both of the clinics that the team visited had non functioning water pumps. UNICEF does have a major WASH programme known as ‘SHEWA B’ on-going enhancing WASH in both urban and rural communities. It is taking a ‘bottoms up’ approach through social mobilisation. It is covering 19 districts – 76 upazillas. This initiative should be widely supported and ultimately should contribute towards mitigating malnutrition.

169. ***Urban Malnutrition:*** One aspect of malnutrition of which there is not sufficient awareness is ‘urban malnutrition’. Given the increase in the phenomena known as rural/urban

¹⁸ Although ‘Parishad’ means council after the Pakistan era was over, Union Council has been renamed as ‘Union Parishad’ or UP for short.

¹⁹ UNICEF estimates that only 46% of the population has access to potable water in Bangladesh against the government estimates of 98%. Similarly UNICEF considers that the government estimates of 80% latrine coverage is a major overestimation and that it is nearer 56%.

drift and that the urban populations only access to food is through the market structure, they become especially vulnerable when they cannot access the market, through lack of cash, and even more so when global market prices for food commodities rise. Any food security/nutrition interventions need to pay heed to the urban food security situation.

6.1.5 Conclusions on Humanitarian Coordination

170. ECHO itself has effectively engaged in many coordination activities, such as actively providing funding for setting up the humanitarian ‘cluster’ system and has strongly promoted improved coordination (DER group activities) as well as setting a standard of coordination. Many of their programmes, where beneficiary community groups were formed, showed dual benefits. First they improved coordination within the local communities by giving people a sense of ownership/responsibility, by raising awareness of disaster preparedness approaches in general and specifically such strategies as evacuation systems, and by promoting different community based initiatives (for example the implementation of their risk reduction plans). Second, coordination was improved by and with local authorities because community based groups, who were collectively becoming aware of their rights, demanded better action and coordination from the local authorities – ‘the rights based approach’.

171. Nevertheless one cannot coordinate on ones own and whilst continuing with its own coordination activities, ECHO has to ensure that its partners coordinate and that ECHO itself continues to coordinate and enhance coordination activities with other instruments of the Commission through the EU Delegation, with other donors, with government at local and national level, and with the UN and humanitarian agencies, all the time taking into account coordination mechanisms within the local communities.

6.1.6 Conclusions on the INGO/Local NGO/ECHO relationship:

172. The evaluation team is not necessarily challenging the symbiosis between international NGOs and local NGOs in Bangladesh, and would support the potential value additions by adopting this approach. The concerns of the evaluation in Bangladesh were that the quality of local capacity building still seems inadequate and monitoring seems casual and limited in terms of frequency, as does knowledge of humanitarian ethics amongst some of the local NGOs.

173. The INGOs seemed to be fully aware of the limitations and advantages of the local NGOs and appeared to be in full control of the situation with apparently some risk minimisation measures in place.

174. There is an argument in Bangladesh that there needs to be carefully arranged space created for local NGOs, so that they can implement programmes more independently (empowering them...), bring innovation and creativity of approaches, while INGOs needs to be more vigilant so that transparency and accountability in implementation is maintained. In the experience of the evaluation team good experienced local NGOs manage to create their own space and by creating this so called ‘space’ for weaker local NGOs all that the INGOs are doing are absolving themselves of responsibility for effective monitoring.

Box 1: Concerns for ECHO in INGO/Local NGO/ECHO relationship might be:

ECHO’s funding is, in effect, being spent by agencies that are not directly accountable to them. ECHO should have a clearer break-down of costs between what

they pay the INGOs and what the INGOs pay to the local NGOs.

Although the INGOs are responsible for accountability there are other elements where accountability is less clear such as:

- a. The motivation of the local NGOs;
- b. The political, cultural, moral and ethical philosophies of these NGOs, whether they have the same humanitarian values (most of the local NGOs to whom the team spoke were not fully aware of the main principles of humanitarian aid) and to what extent these are affected by cultural differences;
- c. The political pressure that is sometimes applied to local NGOs, or for that matter their political affiliations. This is also where INGO monitoring is so important, as the presence of INGO staff can often relieve that pressure,

It also elicits the question of what the added value of the international NGO framework partner might be in cases where the local NGO is large and has considerable capacity and expertise and feels that it does not need the mentoring of the INGO.

6.2 Recommendations

6.2.1 Recommendations on DG ECHO's response to natural disasters

175. Whilst there appears to be little in the European Commission's humanitarian programme in Bangladesh that requires major alteration within the funding parameters that exist, there are some elements that could be refined, reconsidered or adjusted and it should always be remembered that although emergency aid is usually a stopgap/'band aid' solution, in Bangladesh it may need a longer-term perspective, particularly for DRR interventions.

176. ECHO should maintain their presence and their programmes in Bangladesh in order to fulfil what is their primary role – emergency response – in a country that is very often going to need it. ECHO also needs to be always alert to the possibility of much greater disasters requiring proportionately bigger responses. Whilst ECHO Bangladesh cannot expect to have a 'sitting'/reserve budget for this eventuality, there are some measures that they can take in advance of any major emergency – such as ensuring that:

- a. Their implementing partners who are mostly development orientated have the capacity to respond to a major disaster, and that the INGOs ensure that their partner local NGOs have the capacity as well;
- b. The coordination mechanisms do not become totally skewed to a development orientation and can gear up for emergencies,
- c. Emergency response coordination mechanisms amongst the humanitarians are understood and that they are enhanced between the government and the humanitarians, including the military,
- d. The 'cluster' system which appears to have started well in a development focussed environment and which does coordinate with government mechanisms can function efficiently in emergencies.

Timeframe: Soon, Priority: Medium.

177. ECHO's emergency response programmes should continue, as they do now, to include DRR elements, and at the same time to clearly define what the parameters are for any DRR activities.

Timeframe: Ongoing, Priority: Medium.

178. Importantly for ECHO in the context of Bangladesh is to balance or refine their role as an emergency donor, where *'the objectives of humanitarian action are to save lives, alleviate suffering and maintain human dignity during and in the aftermath of man-made crises and natural disasters, as well as to prevent and strengthen preparedness for the occurrence of such situations'*.

6.2.2 Recommendations on ECHO's DIPECHO/DRR-related activities

179. **The DRR programmes should be maintained** both as part of the DIPECHO regional programme and as an integral part of ECHO disaster response programmes, as they are currently.

Timeframe: on-going, Priority: Medium

180. **It is recommended that ECHO specifically evaluates the impact of DIPECHO** projects over a long period and wide geographical areas, but to do so would require that valid comparisons are made, i.e. much time would need to be spent measuring the benefits for assisted communities over a long period, against the neighbouring communities.

Timeframe: underway, Priority: Medium

181. **Defining DRR within emergency response projects:** Although the INGO partners of DIPECHO and the consortia members had good knowledge of DRR and strategies, the evaluation was not convinced that all the local implementing NGOs had the same knowledge or knew what were suitable DRR measures. As DRR becomes more recognised for its importance more thought is given to effective strategies and whether they work. It is not clear how 'up to speed' some of the local NGOs were with this. Even amongst the INGOs who were including DRR in their ECHO emergency response programmes it sometimes appeared that a project that the NGO wished to carry out anyway became entitled a DRR measure. Parameters need to be set within an ECHO to distinguish between a genuine DRR activity and an activity that would be a standard emergency response action.

Timeframe: Medium, Priority: Medium

182. **DRR is also an effective LRRD measure.** This aspect of LRRD should be further explored and enhanced – especially in a country like Bangladesh.

Timeframe: long, Priority: low.

183. **Clarification on DRR Measures:** To ensure that the DRR budget is mainstreamed in ECHO projects appropriately there needs to be a more rigorous definition of what ECHO perceives as a DRR measure. In the case, for example, of the 'restocking' of livestock in some parts of the world – in the Horn of Africa this might be considered as counterproductive to DRR, because it is overstocking of livestock that has led to many of the difficulties with

drought there. The impression of the evaluation was that many of the NGOs had not given sufficient thought to DRR and that some of them wanted the budget line to carry on with projects that they were going to conduct anyway.

Timeframe: long, Priority: low.

6.2.3 Recommendations on Rohingya Crisis

184. **Maintain Current Strategy:** ECHO's current strategy is realistic and programmes should be continued at the current level, with the full knowledge that there is no short-term solution and that ECHO should therefore concurrently try to dovetail their activities into the longer-term strategies of the EU Delegation or other donors so that ultimately they would have an exit strategy from this chronic situation. Alternatively, ECHO as a humanitarian donor involved in a long-term humanitarian crisis should seek the budgeting mechanisms that allow it to fund a long term crisis with flexibility as it evolves, rather than for example being tied in to the sort of long protracted processes that development agencies have to go through if they have to make changes.

Timeframe: soon, Priority: high.

185. **Long-term requirements:** There is a need for a more formalised or better articulated LRRD/Transition policy both between other donors and ECHO and within the Commission, although, the onus is probably on the Commission to find additional ways to adapt funding instruments to support the Rohingya Refugees stranded in Bangladesh. Consideration should be given, for example, to budgeting mechanisms such as the instrument for stability (IfS) or Aid to Uprooted People (AUP).

Timeframe: medium, Priority: medium.

186. **Advocacy:** This is another element of their strategy that ECHO should continue both through the EU Delegation and through their implementing partners. Although it only seems to have had a limited effect on the hard lines of both the governments of Myanmar and Bangladesh, only this sort of advocacy can lead to a political solution.

Timeframe: underway, Priority: high.

LRRD/Transition, Other Instruments of the Commission

187. **Other Donors:** ECHO and the Commission are not the only donors in Bangladesh and other avenues of support for the Rohingya Refugees should be explored, such as, possibly, DfID, USAID, SIDA, AUSAID.

Timeframe: long, Priority: low.

1. **Maintain support for UNHCR:** ECHO and the Delegation should continue to support and coordinate with UNHCR for the Rohingya refugee crisis.

Timeframe: long, Priority: high.

Box 2: Alternative Consideration on the Rohingya Situation

UNHCR has spent many years covering the Rohingya Refugee situation both within the countries to which the Rohingya have taken refuge and within Myanmar itself. Although they have provided considerable humanitarian support they are no nearer finding a sustainable solution and although they receive plenty of vocal support on an international level, they do not receive adequate funding to address all of the humanitarian condition posed by the plight of these stateless and ostracised people, although they do receive sufficient funding for their programmes in the official camps in Bangladesh. For the most part, what they lack is collaboration from the GoB. A strong attempt, for example, was made to improve the general situation in the region and help integrate the Rohingya Refugees through the mechanism of the UNJI, but the GoB would not support this on the grounds that as well as benefiting the indigenous population, it would help the Rohingya. UNHCR believes, as do many other agencies who are involved, that the most practicable solution for the Rohingya Refugees in Bangladesh is to allow them to integrate into the local population and because they have the same dialect, the same religion, and many of the same cultural practices, because they are hard workers and prepared to do the work that indigenous Bangladeshi are reluctant to do, they are potentially ideal candidates for integration. The refugees themselves also want little more than to integrate. Because, however, this has become such a high profile issue and because the government of Bangladesh has been 'backed against a wall' there is little likelihood that this can be achieved in the present climate. It is impossible to run parallel scenarios but it is worth considering what the effects would be if assistance had been kept very low-profile, and whether without the presence of the international agencies and prominent advocacy the Rohingya Refugees might have achieved their aim and quietly integrated into the local population. It is, however, difficult to speculate on this; the intervention was decided precisely after crackdown of already integrated Rohingyas which pushed them around the Kutapalong camp and near Tal/Teknaf)). UNHCR believes that this may be the case and may adjust their strategy, having failed with other approaches. ECHO should maintain dialogue with UNHCR on this issue.

6.2.4 Recommendations on LRRD

188. *Emergency response should not be seen in isolation or compartmentalised.* It has to be seen in the broader framework of sustainable recovery. To achieve this there is a need for LRRD to become integrated into all projects in the manner in which DRR has become.

Timeframe: long, Priority: high.

189. *Forms of LRRD are being applied in Bangladesh,* and they should be continued. ECHO needs to decide what the primary objective of an LRRD strategy should be; whether they see it as a short term exit strategy, or whether they see it as a strategy for enhancing the emergency aid projects that they implement. Through its involvement in a crisis such as the Rohingya Refugees, ECHO is committing itself to a long term emergency and yet its mandate and budgetary constraints are not best suited for an enduring commitment such as this. (Nevertheless comparable to protracted refugee situations of the Horn e.g. Dadaab)

Timeframe: long, Priority: high.

190. **LRRD should be clearly articulated as a policy** then needs to be formulated in a concrete way between ECHO and the other instruments of the Commission, between ECHO and its implementing partners, and between the Commission and other donors. If LRRD were mainstreamed then some thought should be given towards ensuring that the budget reflects this encouraging the implementing partners to ensure that there are links developed between the ECHO-funded emergency response projects and their longer-term recovery projects. This is something, for example, that OXFAM tries to achieve in Bangladesh. Nevertheless, ECHO would have to be wary of being used in such a way that their quick funding mechanisms for emergencies are not used as a sort of bridging loan for agencies waiting to receive long-term funding for development projects.

Timeframe: long, Priority: medium.

191. **Greater coordination between the instruments of the Commission:** Other ways in which to achieve LRRD is by closer linkage with other instruments of the Commission or other donors (Instrument for Stability EC, AUP, FSTP, DRR, Climate Change policies). Certainly, the food security thematic programme (FSTP), which is working towards improving access, improving diet, reducing vitamin deficiencies, awareness raising in Bangladesh can be tied in closely with ECHO's food security and nutrition actions and with livelihood strategies. Other instruments of the Commission (IfS) have been used successfully for the Rohingya Refugee crisis. **The Commission does have a number of instruments to pursue an LRRD strategy** – the difficulty appears to be in reconciling the procedures and time lines.

Timeframe: long, Priority: high.²⁰

192. **Input to Country Plan:** The evaluation team was encouraged to hear that for the first time there would be formal input from ECHO into the Delegation 'Country Plan'. This should prove to be an invaluable contribution to an LRRD strategy.

Underway. Priority high.

193. **ECHO should continue its coordination activities between other donors**, such as DfID on LRRD/Transition issues.

Underway. Priority high

194. **DIPECHO programmes are inherently orientated towards LRRD** through their efforts at encouraging sustainability and they should be continued including the use of consortia.

Underway. Priority medium.

195. **Prioritisation:** Ultimately the degree to which ECHO can pursue LRRD in Bangladesh depends on the size of budget and what the priorities would be. It is recommended that the annual global plan for ECHO Bangladesh should take into account LRRD and ensure that there is some allowance made in budgetary terms – possibly for mainstreaming it. For

²⁰ This, however, has been a major topic within the Commission for many years, and many studies have been done on the issue.

example in some countries where ECHO has implemented specific LRRD projects such as in Angola or Tajikistan, they have supported longer term primary health care developments, including nutrition, and they have gone beyond merely drilling boreholes for access to water and emplacing more durable systems. Whilst these are not necessarily applicable to Bangladesh, the main sentiment which is looking for sustainability is equally germane. .

6.2.5 Recommendations on Food Security and Nutrition:

196. ECHO's overall approach towards food insecurity and malnutrition in Bangladesh is pragmatic and should be continued i.e. short-term interventions in emergency situations, but possibly the strategy could be refined in a number of ways:

- ***Clearly define indicators for entry and exit:*** Currently ECHO's entry point is when an emergency occurs, but the exit point is not so clear. As an emergency donor working in a chronic situation of enormous magnitude, ECHO needs a clear set of indicators for deciding when to become involved and almost more importantly indicators to determine when they could exit.

Although it is beyond the scope of this evaluation to define such indicators, ***they should be seen holistically*** – for example, numbers of U5s above or below certain malnutrition levels in a targeted area might be one indicator, where the exit strategy might be according to Sphere standards – access with treatment for at least 60% of all under five children suffering from SAM and performance indicators that meet SPHERE standards²¹, (cure rates $\geq 75\%$; defaulter rates $< 15\%$; mortality rate $< 5\%$; gain of weight (GOW) in OTP $> 6\text{g/kg/day}$; length of stay in OTP < 45 days). Equally, however, the readiness of another donor or instrument of the Commission to dovetail into an ECHO programme with a longer-term intervention, from, for example, the food security thematic programme, might be another.

Specific nutritional indicators would need to be carefully ***corroborated on information from objective nutritional surveillance***, such as the programme jointly implemented by Helen Keller International (HKI) and the Institute of Public Health and Nutrition (IPHN) of the Government and or other agencies.

Indicators should also come from the ***identification of specific geographical areas***, which evolve from those surveys, complemented by additional area specific surveys. For instance, HKI identification of the 'char' (alluvial islands on major rivers) people indicates an acute poverty group highly vulnerable to floods and acutely deficient in their nutrition intake. The outlines of a project area would be based on specific surveys undertaken. In this respect the WFP poverty mapping is an extremely useful tool.

The evaluation understands that the food security and nutrition sector are fully aware of the Community-based Management of Acute Malnutrition, (CMAM), Helen Keller Institute approach and use some of these indicators, but for ECHO, as an emergency donor, their own indicators as to when they should become involved in a nutritional situation have to be developed. To emphasise, these would not necessarily be technical nutritional indicators, but could include other aspects that would affect the decision of an emergency donor, such as the degree to which other donors become involved. If, for example, DfID were to state that they were going to implement a 2 year nutritional programme, this would lessen the need for ECHO's involvement over a protracted period.

Underway. Priority high

²¹ The Sphere Project : Humanitarian Charter and Minimum Standards in Humanitarian Response

197. **Coordination with EU Thematic Programmes (e.g. FSTP):** Interventions for food security and specifically targeted nutrition interventions under ECHO support should be coordinated with on-going interventions of the EU under its thematic programmes both at entry and exit, as well as with other donors – in other words implementing an LRRD or transition strategy.

Underway. Priority high

198. **Holistic/Comprehensive Approach:** ECHO should continue with interventions that have a comprehensive approach. For example, by providing cash for work, as happens in many of their programmes, not only does it enable the affected population to obtain food with the cash, but the cash regenerates the market and in cases, for example, where the work improves road structures, then access to the market is improved.

199. **Livelihoods:** Emergency interventions should also continue to aim at the provision of not only short-term food security but also short-term livelihood security, including health, water, sanitation and employment options.

6.2.6 Recommendations on Humanitarian Coordination

200. Bearing in mind that Bangladesh, as a sovereign state is responsible for coordination in major emergencies, and although the government coordination mechanisms appear to be making progress, they are yet to be tested and it is likely that during a humanitarian disaster they would need support. This, however, would have to be done in such a way that coordination is not ‘imposed’ by the international system.

201. Civil military coordination, in a major emergency situation where the military are likely to be a primary responder needs to be better established and ECHO Bangladesh should advocate for clear civil military coordination in an emergency setting.

Underway. Priority medium.

202. Generally ECHO Bangladesh should continue with its current coordination strategies, but in addition ECHO supported programmes should give increased emphasis to participation, partnership, rights and enhanced humanitarian values. This is very important from the perspective of sustainability of benefits. Community participation from planning to implementation process gives people ownership to their work and their achievements, thus responsibility to maintain them. This is also an important aspect of durable, yet cost-effective processes for ‘transition’ or linkage to development – an element of LRRD.

Underway. Priority high.

203. ECHO should continue to support (ECHO is currently funding the OCHA HAO) the efforts to introduce the ‘cluster’ system. If this becomes effective the system will solve many other coordination problems. At the same time, whilst it is commendable that much effort has been put into improving the humanitarian coordination mechanisms in Bangladesh, and that progress is being made, it is likely that the current system (and, for example, the single OCHA humanitarian affairs officer responsible for coordination) would still need to be significantly bolstered in the event of a major disaster. This should be borne in mind in the context of OCHA’s ability to deploy rapidly in a major emergency.

Underway. Priority high.

204. ECHO should continue with its effective, informal coordination activities with other donors (mainly DfID).

Underway. Priority medium.

205. Emphasis also needs to be given to 'Partnership' relationship between community groups and local NGOs as much as INGOs and local NGOs. Because, partnership implies shared responsibility and a process of enhancement of capacity and empowerment for the weaker partner.

Underway. Priority medium.

206. The rights orientation of the programmes should be continued. It gives the deprived a sense of respectability and undoubtedly it helps the concerned public and private sector service institutions to become more responsive to the needs and demands of the people and ultimately spurs the government institutions in to greater action, thus prompting a drawing together of the 'bottom up' approach to the 'top down approach'. This approach also awakens the sense of the humanitarian values among the community as demonstrated by people's concerns in the project areas about the helpless older persons and persons with disability. This is important not just from an altruistic viewpoint, but also very important for a sustainable and inclusive process of development.

Underway. Priority high.

207. For effective coordination in the long term amongst and between the INGOs and local/national NGOs there also has to be an emphasis on genuine partnership as opposed to what appears now as contractor/contractee relationship. It has to be an empowering process rather than merely a subcontracting arrangement of commercial nature.

This issue is being examined by the ECHO evaluation on LNGOs.

208. The consortium system has great advantages for coordination, but the way in which it has been developed in Bangladesh appears to suit development situations. It may need to be customised slightly to be able to swiftly respond to emergency situations. As it works now, in an emergency situation it is questionable whether it can be sufficiently speedy with so many members of a consortium whose consensus would be required. This is an issue that needs to be further investigated. It is also important to ensure that the consortium system works in harmony with the cluster system.

Timeframe medium. Priority medium.