

LCG Environment Sub-Group Assessment of the Bangladesh iPRSP

Summary

The iPRSP has been assessed from an environmental perspective under the four criteria specified by the World Bank. In summary, it can be concluded that whilst the importance of environmental issues has been acknowledged, they have not been adequately integrated into the sectoral parts of the document, the means by which they will be addressed have not been spelled out, and some specific issues have been neglected. For example, the environmental aspects of health, vulnerability due to climate change and natural resources, all need more attention. Moreover, given that the Poverty Reduction Strategy (PRS) largely depends upon sustainable growth in the utilisation of natural resources, the additional cost of improved environmental management should have been included in the budget.

Sector Strategy

Environment is not a sector as such, but there is a short section (H) on 'Caring for Environment' at the end of the Poverty Reduction Strategy. This clearly outlines:

- the intimate relationship between poverty and environment,
- national dependence upon sustainable utilisation of natural resources,
- and the need to integrate environmental issues into the sectoral poverty reduction strategies.

However, environmental issues have not then been fully integrated into the rest of the document, and there is not a clear expression of how environmental issues should be addressed. The problem may be due largely to the perception in the iPRSP that *degradation* is the only environmental concern, whilst the tackling of a much broader range of issues by environmental *management* should be the main focus within poverty reduction. The optimisation of environmental benefits can then also be considered, in addition to the prevention of harm to the environment (which can have a negative image in development circles). Given that environment is a cross-cutting concern, it does not matter if the word 'environment' is not used, as long as the issues are clearly expressed.

The only environmental agenda in the Medium Term Policy Matrix for 2004-6 (Table 6) is to 'Integrate environmental conservation into the national development strategy.' The concept of integration is welcomed, but again, the approach to environmental management should be much more fundamental and broader than *conservation* alone. The relevance of environment should therefore be mentioned in relation to the other agendas in the matrix, e.g. for education, health, tax policy, privatisation and power (see comments under Reforms below). For 2003-4, the given agenda is implementation of 'the environmental strategy', drawing upon the Environmental Policy 1992, NEMAP and the Dhaka Declaration 2000 (now superseded by Dhaka Declaration on Bangladesh Environment 2002). This is a reasonable approach, but the PRSP should make clear what 'the environmental strategy' actually is (presumably the sentiments expressed under section H). It should also outline how the very comprehensive recommendations of the referenced documents are to be implemented.

There is insufficient recognition that the term 'environment' encompasses a large number of issues, many of which have been mentioned separately in the iPRSP under the individual sectors. The benefit of recognising the linkages between these issues under the hat of 'environment', is that they can be addressed in an integrated and therefore more effective manner. If the very concept of environment is not understood, the potential benefit of that integration will be lost.

Energy Policy Most of the rural population cook using biomass fuel, which accounts for 73% of the per capita energy consumption. The burning of animal dung results in a loss of organic manure and building material, whilst the use of fuelwood results in soil erosion and reduced biodiversity in the hill lands. Both fuels cause indoor air pollution, which has its greatest effect on the health of women and children. However, the PRSP only addresses power development and rural electrification. It is necessary for the PRSP to present a more comprehensive equitable energy policy, which will take into account all energy sources, including bottled gas and cost-effective renewables, and will seek to avoid the serious environmental problems referred to above.

Environmental Health It is estimated by WHO that one third of all disease in Bangladesh is environmentally attributable, including 90% of diarrhoeal disease and 60% of acute respiratory disease. However, the Health Sector Annex (7) of the iPRSP concentrates on the provision of improved health *services*. The challenge for the final PRSP will be to refine the health strategy so that it also addresses the underlying environmental causes of so much of Bangladesh's ill health, and defines their solutions, such as reduced indoor and urban air pollution, proper sanitation and improved quality of water supply (particularly re arsenic concentration), along with the promotion of hygienic practices.

Agriculture & Natural Resources Management Much reliance is placed on the intensification of crop production. Whilst reference is made to the need for good environmental management, further stress should be placed on the benefits of good soil husbandry, integrated pest management (IPM), permaculture, etc. The potential environmental consequences of agricultural intensification should also be flagged, particularly the health and ecological impacts of increased pesticide use. A more holistic approach to NRM is also needed, including the issue of equitable access of the poor to the common property resources of land and water bodies, and their management to avoid over-use. In addition, opportunities for natural resources based employment and the benefits of a *sustainable livelihoods* approach should be emphasised. Given the reliance of the population on finite natural resources, continuing efforts to reduce population growth should be given much greater prominence.

Environmental capacity-building Implementation of the PRS will need much improved environmental management skills in both government and the private sector. The Ministry of Environment, and particularly the Department of Environment will also require a significant increase in staff numbers as well as revenue budget support as this will help to increase its competencies and therefore enable it to sustain main activities beyond specific project period.

Processes:

The importance of community participation in both the design and implementation of the PRSP should be emphasised. Further attention also needs to be given to environmental management of the proposed rural industrialisation and privatisation of state enterprises, including the application of EIAs, 'cleaner production', EMPs and environmental audits. Fiscal measures are another environmental management tool that should be introduced – taxes and charges for the benefit of good NRM, eg licensing and charges on brickfields and shrimp farms, could be very effective. Improved public awareness and environmental education are also needed (to men, women, girl and boy children).

Overall Assessment of the Realism of the Agenda

Implementation - Whilst the poverty / environment link, sustainability, and the need for integration have been recognised in the iPRSP, there is the need for an overt environmental implementation strategy. It is not sufficient to assume this to be the responsibility of the individual sectors. The addition of an Environmental Annex would be helpful in elaborating the environmental agenda.