

NDP Inspection Panel requesters, Pakistan Fisherfolk Forum, Japan Center for Sustainable Environment and Society, Campagna per la Riforma della Banca Mondiale (Italy), Urgewald (Germany), Bank Information Centre (USA), Hirrak Development Center (Pakistan), Pakistan Institute of Labour Education and Research, Creed Alliance (Pakistan), Sustainable Development Policy Institute (Pakistan), Action Aid Pakistan, International Rivers (Germany/USA), Creed Alliance (Pakistan)

November 21, 2007

To all Executive Directors of the World Bank

Per email

Implementation of the NDP Action Plan in Pakistan

Dear Executive Directors of the World Bank:

In 2006, the World Bank's Inspection Panel (IP) issued its investigation report for the Bank-funded Pakistan National Drainage Program (NDP). The IP report found that Bank management had violated six of the Bank's safeguard policies in the NDP project, contributing to the loss of lives¹ and livelihoods in Pakistan's Southern Sindh province.

In response to the findings of the IP investigation, Bank management outlined measures they would take to address the policy violations and problems in the NDP. The Board approved the Southern Sindh Water Management Action Plan in November 2006 and asked Bank management to report on progress of the Action Plan's implementation by June 2007 and by November 2007.

On October 19, 2007, Mustafa Talpur, a requester of the NDP Inspection Panel case, presented key concerns with the implementation of the Pakistan NDP Action Plan in a meeting with European Executive Directors and their alternates at the World Bank headquarters in Washington DC.

¹ The Inspection Panel in its 2006 report wrote that because of the structural failures of the Bank-financed LBOD and Tidal Link, they collapsed during the 1999 cyclone and the 2003 floods. This was at a time when the NDP project, which included the extension of the LBOD, was ongoing. The destruction of these infrastructures led to the loss of lives in both 1999 and 2003, according to the Inspection Panel report. See for example page xviii of the 2006 report.

The requester outlined that the World Bank's Action Plan was not prepared in consultation with the requesters of the Inspection Panel case, nor with the people living in the NDP-affected areas. The Action Plan does not include adequate measures to mitigate the impacts of World Bank-funded water projects² on the affected people and ecosystems, nor does it provide compensation for the losses of the affected people. It ignores the requesters' and the affected people's suggestions regarding long-term solutions to the problem of drainage effluent disposal and fails to provide alternative solutions.

With this letter, we want to remind the Executive Directors of the key demands that were raised by the requester at that meeting and urge you to respond to the concerns of affected people in Pakistan, who the NDP claimants represent.

The key recommendations are:

- 1) **Independent Monitoring of Implementation of Action Plan:** People from the affected areas in Sindh, Pakistan feel that the implementation of the Action Plan does not address their concerns and the findings of the Inspection Panel report. In contrast, the Management of the World Bank is of the opinion that the Action Plan is the correct response to the Inspection Panel report. In order to get clarity regarding the implementation of the Action Plan and its appropriateness as a response to the Inspection Panel report, we support the demand of the affected communities that the Inspection Panel, an institution with a proven history of independence and expertise, visit the area and do an independent assessment of the adequacy of the Action Plan and its implementation as a response to its findings.
- 2) **Tabling Action Plan Progress report and Independent Evaluation as Agenda Item in Board Meeting:** The next NDP Action Plan progress report, which is scheduled for the end of November 2007, needs to be discussed at a Board meeting. A repeat of the differences of opinion and lack of clarity regarding implementation between the management and the requesters, as witnessed in the controversies around the July progress report (see also the International

² The NDP project was originally planned as the first phase of a multi-year program for the water sector in Sindh, comprising of infrastructure investments, institutional reform, research and sector planning. The NDP project included the completion of the Left Bank Outfall Drain (LBOD). The LBOD consists of a "Spinal Drain" and related structures that drain irrigation and agriculture effluent from the north to the sea. The final connection of the LBOD to the sea is called the "Tidal Link". The LBOD was originally funded by an IDA credit approved in 1984 and closed in 1997.

Rivers report "Shattered Lives and Broken Promises"

<http://www.internationalrivers.org/en/follow-money/world-bank/shattered-lives-and-broken-promises>) can only be avoided if the November progress report is discussed in a Board meeting. For the Board to achieve a balanced assessment of the situation on the ground, the requesters, as representatives of the affected people need to be given an opportunity to present their views in that Board meeting, and the Inspection Panel should be enabled to present its findings on the Action Plan implementation at the said meeting.

- 3) **Revision of Action Plan:** The Action Plan was not prepared in consultation with the affected people and the requesters and therefore needs to be revised in close cooperation with the affected people and the requesters. The Board needs to push for a revision of the Action Plan in close consultation with the affected people and the requesters.

At the October 19, 2007 meeting, Executive Directors agreed that the November progress report should be discussed in a Board meeting and that an independent institution should be sent to Sindh/Pakistan to verify the adequateness of the Action Plan and its implementation on the ground. We very much welcome this support and urge you to follow through on these commitments by committing the Inspection Panel to carry out an independent assessment, and thereby assume responsibility for the follow-up to the NDP Inspection Panel report. We urge you to also make sure that the World Bank's Action Plan addresses problems on the ground in Sindh/Pakistan and the vulnerability of the population of Sindh, which was exacerbated by the NDP and earlier World Bank funded projects in the region.

We are happy to answer any questions you might have and thank you for your attention

Sincerely,

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Pakistan

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