

Policy Responses to Climate Finance in Bangladesh: An Anthropological Interpretation of Policy Making Process

Nushrat Tashmin

Lecturer

Department of Sociology and Anthropology
Green University of Bangladesh
Begum Rokeya Sarani, Dhaka, Bangladesh
tashmin.soc@green.edu.bd

Abstract: *Bangladesh is widely recognized to be one of the most climate vulnerable countries in the world and climate change issues are being one of the major focuses of the government and other development agencies of Bangladesh. The present paper deals with the policy making process of climate change finance in Bangladesh, as policy and financing issues are the major responses to combat climate change, which is posing constant threat to the ecosystem of Bangladesh. In the present paper, this issue is analyzed from the perspective of the anthropology of public policy, as anthropology is a multidisciplinary field. The Current public policy discourses (regarding climate change finance) of Bangladesh do not significantly uncover the insight stories of making the policies. How culture, power, social structures in a particular institution play a central role in defining policy agenda and how and what ideology incentives and grievance drive the policy agenda is not explored and well written in most of the policy research. These issues are revealed in the present paper which identifies the contestation, negotiation and gaps of the present climate finance policies of Bangladesh by analyzing the process of policy formulation from the perspective of the anthropology of public policy, on which we need to know more about.*

Keywords: *Climate Change; Climate Finance; Culture of Policy Making; Anthropology of Public Policy*

1. INTRODUCTION

The present article is about the critical analysis of the present situation of the policy making procedures regarding climate change in Bangladesh with a specific lens of anthropology. The present article focuses on the public policies of Bangladesh regarding climate change from a critical analytical stance of the anthropology of public policy. As a subject of anthropological analysis the importance of policy arises from the fact that policies are major instruments through which governments, companies, non-governmental organizations (NGOs), public agencies and international bodies classify and regulate the spaces and subjects they seek to govern, and through the analysis of these policy processes we are able to observe the way fragments of culture and society are brought into new alignments with each other to create new social and sematic terrains (Shore and Wright 2011).

Bangladesh is widely recognized to be one of the most climate vulnerable countries in the world and climate change issues are being one of the major focuses of the government and other development agencies of Bangladesh. In the last several decades Bangladesh played important roles in the scientific and political arena of climate change. The country also made significant progress in formulating climate change related policy documents. In the last few years all major national policy documents have addressed and incorporated climate change issue (Mukta 2012). The Government and other development agencies are involved in climate change adaptation (CCA) and disaster risk reduction (DRR) programs and in Bangladesh context, the Ministry of Forest and Environment plays an important role (Including policy formulation, planning, resource allocation and programme implementations). A financial procedure regarding the climate change funding (policy and fund management) is largely involved in translating climate change policies. Therefore, it is very important that without proper strategies, planning and resource allocation procedures, the meaningful implementation of national level climate change policies and plans will be impossible in Bangladesh. In case of meaningful implementation of the sectoral programmes regarding climate change, policies are essential. Considering climate change risks, Bangladesh government has already formulated National Adaptation Program and Action (NAPA), Bangladesh Climate Change Strategy and Action

Plan (BCCSAP-2009), and Bangladesh Climate Change Trust Fund Act-2010. In recent time, anthropologists have expanded their analysis of the current context from a concentration on communities and nation states to the interrelationships between economic, cultural, social, and political dimensions of globalization. They highlight the similarities and differences in the experiences of people, and the multiple dimensions of global, economic, political, and cultural processes on productive and reproductive activities (Okongwu and Mencher 2000). In the present article, the major reason for focusing on policy is because it articulates social processes which span many locations. Climate related policies in our country corresponds to the differing needs and capabilities of the people to deal with the challenges of climate change, as well as the social and economic realities of the people living in this country. With a special lens of the anthropology of public policy, the present article proposes to highlight the policy making procedures of the climate change in Bangladesh with a detailed analysis of the policy formulation, planning, allocation, distribution, implementation and evaluation of the regarding the issue. Here another goal is to identify the loopholes of the policy making procedures of climate change in Bangladesh with a critical analysis from the perspective of anthropology of public policy.

The notion of policy is different from the authoritative instrumentalism of conventional approaches, entails opening up and sustaining a space for reflection by critical and reasoning subjects. In this present article anthropology gives the policy making process of climate change in Bangladesh, an analytical edge which is about to understand the meanings and subjective understandings of the policy makers of the climate change related activities in Bangladesh and at the same time, it is about to challenge received wisdom and to think outside of the conventional policy box. An anthropology of policy is not simply concerned with representing local, indigenous, or marginalized 'cultures' to policy makers, government agencies, or concerned NGOs. Its focus instead is simultaneously wider and narrower: wider insofar as its aim is to explore how the state (or to be more exact, those policy makers and professionals who are authorized to act in the state's name) relates to local populations; and narrower to the extent that its ethnographic focus tends to privilege the goal of understanding how state policies and government processes are experienced and interpreted by people at the local level, keeping in mind that anthropologists are recasting the 'local' or the 'community' to capture changing realities (Wedel, et al. 2009). From the researcher's point of view, social anthropologists are experienced at tracking the genealogies and flows of policies and their impact on peoples' lives and everyday behavior. For this reason the researcher tends to present the policy making process of climate change related activities in Bangladesh from the perspective of the anthropology of public policy.

To have an overview on the policy making procedures regarding climate change related activities, here, the researcher has studied the policy making procedures for combating climate change in Bangladesh, from the perspective of the anthropology of public policy. For collection of data, the researcher used various methods (qualitative research methods). For the present study the researcher has interviewed different actors and stakeholders related to the field of the climate finance of Bangladesh. Anthropological approach in the analysis of public policy recognizes that policies are simply instrumental governmental tools- they are actants that have agency and that change as they enter into relations with actors, objects and institutions in new domains. There has also been a series of policy and institutional changes undertaken by the Government of Bangladesh in recent years influenced by transformations in ideas, knowledge, actors and incentives to face the challenges of climate change. Here, the available sources of secondary information (like: Books, articles, newspapers, magazines, relevant Government documents, policies, national and international policy related documents, relevant study reports and documents of different NGOs and NGOs, web sites) regarding the climate change, and policies to combat against climate change in Bangladesh, have been explored. As the present article focuses on the policy making procedures of climate change related activities in Bangladesh, so the researcher has collected plenty of data from secondary sources for the basic understanding about the climate change related policies and the process of the planning and implementation of the policies in Bangladesh. To have an overview on the topic many actors were interviewed who are related to the climate change issues of Bangladesh. Different stakeholders were interviewed, such as, actors of policy making, experts on IPCC /academics/practitioners, climate change experts, government bureaucrats, international organization personnel, local community people, NGO personnel and so on. To have data from primary sources different methods were used, such as Interview, key informant interview, focused group discussion, and the extended case method.

1.1. SITUATION and CONTEXT

Climate change is the significant change in the weather patterns over periods (Jade 2014). It means a change in the climate patterns of the world. Climate change can lead to desertification, more intense storms, melting of the polar ice caps, and rising sea levels, changing the physical face of the Earth and the pattern of our everyday lives (Encyclopedia 2007). Today climate change is one of the greatest challenges for the world (The World Bank Group 2012) and the intensity and frequency of climate-induced disasters have been increased in recent years (Roy 2010).

Climate change policy making involves many actors. These include emitters of greenhouse gases, those who make climate change policy and those who will be affected directly and indirectly by climate change. This covers organizations from the national and international research community; national, regional and local government; non-governmental organizations (NGOs); multinational corporations and the huge range of local communities and citizens. Thus, perceptions of, and policy responses to, climate change are closely related to individual/ societal outlooks, consumption patterns, and the influence of regulations, pricing, media coverage and awareness-raising campaigns (Shafie 2014).

Public policy making can be seen as a process occurring in several domains including problem identification, policy formulation, advocacy, implementation, and evaluation. Although these domains of activities 'ought to' happen sequentially, but in reality many of these processes are iterative and may occur simultaneously. In the case of climate change, challenges of designing research to be 'policy-relevant' largely remains with the responsiveness of the scientific process to the needs of policy managers for particular clarity or understanding lying behind scientific assessments or predictions (Shafie 2014).

1.2. Climate Change Impacts in Bangladesh

A change in climate will affect natural resources, such as water, forests, and grasslands. Changes in natural resources will have social and economic effects; some beneficial, some detrimental. The socio-economic effects of climate change therefore arise from interactions between climate and society and how these in turn affect both natural and managed environments. Traditionally, in Bangladesh, climatic variations have provided opportunities (resources) and imposed costs (hazards), depending on how society adapted to the environment. Bangladesh is a newly developing country in transition from being a traditional rice-growing society. In the drive for modernization, evolving technologies and economical and social structures alter existing systems and make many sectors of, and groups in, society more vulnerable to significant variations in climate and sea level (Ericksen, Ahmad and Chowdhury 1993). The impacts of global warming and climate change are worldwide. For Bangladesh they are most critical as large part of the population is chronically exposed and vulnerable to a range of natural hazards (Department of Environment, Bangladesh 2007).

Climate change impacts are already adding significant stress to our physical and environmental resources, our human ability, and economic activities. Impacts of observed changes are felt most in the different sectors, like: Water resources, Coastal resources, Agriculture, Health Livelihoods, Food security, Habitat/settlement security (Department of Environment, Bangladesh 2007).

1.3. Climate Change Response in Bangladesh

1.3.1. Policy Initiatives

Bangladesh has extreme environmental vulnerability to climate hazards, irrespective of the exacerbation caused by increased greenhouse gases in the atmosphere. . In recent years therefore, whilst climate change policy is a new element in national policy and development partner support, it is being framed within these broader policy contexts. With the support of the well-established scientific community and strategic development initiatives, Bangladesh and has long been active in the UNFCCC process. There has also been a series of policy and institutional changes undertaken by the Government in recent years influenced by transformations in ideas, knowledge, actors and incentives (General Economics Division, Planning Commission, Bangladesh & UNDP 2009).

Bangladesh produced its National Adaptation Program of Action (NAPA) in 2005 and was a lead player on NAPAs in the UNFCCC. But weaknesses in relying on this selective approach became clear. Spurred on by Cyclone Sidr and with the stimulus of the Bali Action Plan, the GoB prepared the

Bangladesh Climate Change Strategy and Action Plan (BCCSAP) in 2008/9 to provide strategic direction on climate change. Prior to BCCSAP formulation, GoB formulated a number of national and sectoral strategies and action plan including the national water management plan, the national biodiversity strategy and action plan for Bangladesh and national environmental management plan including climate viabilities (Planning Commission, Ministry of Planning, Bangladesh 2012).

1.3.2. Recent Policy Developments in Bangladesh Regarding Climate Change

Key recent policy developments include:

- National Adaptation Programme of Action (NAPA) (2005 and revised 2009)
- Bangladesh Climate Change Strategy and Action Plan (BCCSAP) (2009)
- Climate Change Unit in Ministry of Environment & Forests
- Climate Change focal points established in relevant ministries (Planning Commission, Ministry of Planning, Bangladesh 2012).

Bangladesh is the one among many developing and least-developed countries that formulated and adopted such policy positions, through these policy documents have some limitations both in terms of process and subject matter (Shamsuddoha and Bijoy 2014). Policy proposals on Climate Change issues in Bangladesh emerged as one of the top of the agendas because the associated impacts are recognized as important. But the driving question here is that how this problem is framed or brought to policy maker's attention (example: through data or focusing events) and by whom the policy proposals are generated, debated, revised, and put forth for serious consideration? The likelihood of policy to be successful increases if perceived as technically feasible, compatible with policymaker's values, reasonable in cost, and appealing to the public. In this respect, climate change policies requires significant revisions focusing on how the choices are actually made from the large set of possible policy alternatives in the context of Bangladesh. The problem, policy and politics streams together converge into the overall policy process to open up policy windows. These there streams are important and decisive to the overall policy process to transform an issue from a mere topic and/or problem into a concrete policy. In addressing a compelling problem like climate change, the policy entrepreneurs had played a key role in connecting the streams, and the different types of couplings between them (Shafie).

For the implementations of the climate policies in our country, here comes the issue of finance. So we can link the climate finance as a response of climate change in Bangladesh. This is a crucial co-ordination mechanism in the allocation of resources and it is essential that balanced policy influences operate to optimize resource allocation.

2. ANTHROPOLOGY AND CLIMATE CHANGE ISSUES

Anthropologists increasingly have been active in documenting the special challenges, lived experiences, local knowledge, and perceptions of contemporary anthropogenic climate change in human communities, especially in developing settings that are hardest hit but least involved in the production of greenhouse gases. Here anthropologists are assessing concepts like risk, vulnerability and resilience in examining the sustainability of local ways of life and resource utilization. Anthropologists have worked on identifying the range of factors that influence how and why communities react as they do to climate change. There has been growing anthropological involvement in assessing the social origins of climate change in light of the growth of the global economic system's dependent on profit-making and unequal distribution of wealth, continual resource-depletion, and mounting waste producing economic expansion. Susan Crate brings an inherently interdisciplinary social science teaching and research agenda to our center, focusing on the theoretical frames of human, cultural & political ecology, and environmental and cognitive anthropology (George Masson University: Center for Climate Change Communication 2012). Susan A. Crete and Mark Nuttall described about anthropology and climate change in their book: 'Anthropology and Climate Change: From Encounters to Actions' 2009 (Eds.). They described about anthropological insights to climate change which can be related to the issues of the present research. According to them, from an anthropological perspective, climate change is ultimately about culture, for in its wake, more and more of the intimate human-environment relations, integral to the world's cultural diversity, lose place. They make a salient point that despite the impact of climate change on indigenous peoples

and their traditional knowledge, international experts and policy makers most often overlook the rights of indigenous peoples as well as the potentially in-valuable contributions from indigenous peoples' traditional knowledge, innovations, and practices in the global search for climate change solutions. And since adaptation to climate change is something that primarily takes place at the local level, it is paramount that indigenous peoples and place-based societies themselves define the risks related to rapid change (Nuttall 2009).

According to them, communities differ in the way they perceive risk, in the ways they utilize strategies for mitigating negative change, and in the effectiveness of local adaptive capacity. In field contexts anthropologists see that the effects of climate change are prompting the adoption of different subsistence and local economic strategies to suit new ecosystem regimes or, with more rapid change, the displacement and resettlement of peoples who risk losing their homeland to environmental change. Policy responses need to be informed by a greater understanding of how potential impacts of climate change are distributed across different regions and populations. Climate change brings additional vulnerabilities for indigenous peoples, which add to existing challenges, including political and economic marginalization, land and resource encroachments, human rights violations, and discrimination. Anthropologists have begun to draw attention to the interaction of climate change with a substantial list of other anthropogenic environmental transformation and ecological crises. Anthropologists are working in applied initiatives that seek to respond to climate change at the local, regional, national, and global scales (American Anthropological Association 2013). This is how anthropology and the issues of climate change are linked.

3. ANTHROPOLOGY AND POLICY MAKING CONTEXT IN BANGLADESH

“Public policy is the action taken by government to address a particular public issue. Local, state, federal, and international government organizations all craft and implement public policy to protect and benefit their populations” (John Hopkins Institute for Policy Studies 2014).

Policy is needed to prioritize and strategize the unlimited needs with limited resources. Therefore, the prioritization and stratification become important and the issues of Ideology, guidance, institution and strategies play decisive role in setting agenda (Kingdon 2003). In Bangladesh, there are several public policies regarding climate change adaptation (CCA) and disaster risk reduction (DRR). There are also policies for arranging and spending funds for implementing these issues. In this area, Ministry of Environment and Forest plays an important role. There are various projects which have already been implemented or being implemented under this ministry. The activities of MoEF include formulation of policies regarding climate change adaptation, mitigation and finance (Planning Commission, Ministry of Planning, Bangladesh 2012).

Anthropology of policy evaluates how the state relates to local population and explores how the state policies are implemented among the local people and their experiences about these (Wedel, Shore, & Feldman 2009). Anthropology of policy is more concerned with understanding of how the policies functions and the anthropologists have the potential to be effective interpreters in pursuit of consensus of policies generated by the state (Berreman 2008). From an anthropological perspective climate change is about culture because of intimate human-environment relations which are integral to Worlds' cultural diversity (Crate and & Nuttall 2009).

Now a days, climate change issues are being one of the major focuses of the government and other development agencies of Bangladesh. The Government and other development agencies are involved in climate change adaptation (CCA) and disaster risk reduction (DRR) programs and in Bangladesh context, the Ministry of Forest and Environment plays an important role (Including policy formulation, planning, resource allocation and Programme implementations). A financial procedure regarding the climate change funding (policy and fund management) is largely involved in translating climate change policies. Therefore, it is very important that without proper strategies, planning and resource allocation procedures, the meaningful implementation of national level climate change policies and plans will be impossible in Bangladesh. In case of meaningful implementation of the sectoral programmes regarding CCA and DRR, the essential funds and funding policies are essential. Resource allocation for CCA and DRR derives from the national budget of our country.

Although the climate change problems are vast in our country, therefore finance play and critical incentives and grievance in shaping the policy agenda in Bangladesh. There is an operational structure

in Bangladesh regarding climate change adaptation (CCA) and disaster risk reduction (DRR) concerns. This operational structure includes policy formulation (sectoral strategies and policies), planning (sectoral plan), resource allocation (sectoral budget envelope) and Programme implementations (sectoral programmes). The actors and stakeholders play an important role in the formulation of policies, strategies and plans because on these policy formulation procedures, the resource allocation system depends. Under this background the present study aims to reveal the concerns of the actors and stakeholders of policy making procedures regarding climate change finance. This study analyzes the policy formulation and implementation of climate finance processes with the perspective of the anthropology of public policy.

Anthropology as a field has contributed, and continues to contribute, to social policy research, practice, and advocacy in a number of different ways; it has taken on increasing relevance as the world is rapidly being transformed by the process of globalization (Wedel, et al. 2009). Anthropological approach in the analysis of public policy recognizes that policies are simply instrumental governmental tools- they are actants that have agency and that change as they enter into relations with actors, objects and institutions in new domains. Here the challenge is to study policies as they develop and as they enacted in everyday practice (Shore and Wright 2011). In anthropology the reason for focusing on policy is because it articulates social processes which span many locations. Anthropological perspectives on the study of policy usually focus on the fields which spanned international and national governmental agencies, industrial and other pressure groups, professional organizations, as well as media, all of whom have interest in shaping the policies (Shore and Wright 2011). In the anthropological analysis of policies, it is important to recognize that ideology and public policy are critically linked, the policies reflects the contestation of the ideologies of the actors and stakeholders in the making and implementation of the public policies.

The anthropology of policy takes public policy itself as an object of analysis, rather than as the unquestioned premise of a research agenda. Anthropology is well suited to explore the cultural and philosophical underpinnings of policy. Its enabling discourses, mobilizing metaphors, and underlying ideologies and uses. Anthropologists can explain how taken-for-granted assumptions channel policy debates in certain directions, inform the dominant ways policy problems are identified, enable particular classifications of target groups, and legitimize certain policy solutions while marginalizing others (Wedel, et al. 2009).

Anthropology contributes a broad holistic outlook on society-environment relations (Barnes, Dove, Lahsen, & Mathews 2013). To cope with the challenges posed by climate change re-quires significant financial resources and climate finance is complex because of the diversity of sources of funds (Irawan & Heikens 2012). The effect of climate change are not just about communities or peoples but about their capacity to adapt and exercise resilience to face the changes (Crate & Nuttall 2009). Developing countries like Bangladesh, have emphasized on the climate change issues specially on adaptation(CCA) and disaster risk reduction (DRR) from the government and developed country finances to cope with the climate change challenges (Planning Commission, Ministry of Planning, Bangladesh, 2012 ; Practical Action n.d.; Siddiqui n.d.). In our country there has been a series of polies taken by the government (Planning Commission, Ministry of Planning, Bangladesh 2012; Ayers 2008; Finance Division, Ministry of Finance, Government of the People's Republic of Bangladesh 2014; Department of Environment, Bangladesh 2009) regarding climate change.

The Current public policy discourses (regarding climate change finance) of Bangladesh do not significantly uncover the insight stories of making the policies (Department of Economics, Göteborg University 2006; (Finance Division, Ministry of Finance, Government of the People's Republic of Bangladesh 2014; Shafie 2014; Dutta, et al. 2011)). How culture, power, social structures in a particular institution play a central role in defining policy agenda and how and what ideology incentives and grievance drive the policy agenda is not explored and well written in most of the policy research.

Anthropologists have begun to assess the social origins of climate change in light of the growth of the global economic system's dependent on profit-making and unequal distribution of wealth, continual resource-depletion, and mounting waste producing economic expansion. The impacts of, and policy response to climate change varies from country to country. In Bangladesh, policy proposals on Climate Change issues emerged as one of the top agendas as the impacts of climate change is robust. The likelihood of policy to be successful increases, if perceived, as technically feasible, compatible

with policymaker's values, reasonable in cost, and appealing to and owned by the public. In this respect, climate change policies requires significant revisions focusing on how the choices are actually made from the large set of possible policy alternatives in the context of Bangladesh.

4. CLIMATE CHANGE RESPONSE IN BANGLADESH

4.1.1. Policy Response

In Bangladesh there are several policy response options that exist that relate to climate change. These include:

- Indirectly addressing the impacts of climate change through programmes that reduce vulnerability through for example poverty alleviation, employment generation, crop diversification;
- Directly addressing vulnerability to climate variability and extreme events through disaster risk reductions and management schemes; and specifically targeting climate change by mainstreaming climate change into sectoral plans and national policies. (Ayers, 2008)

Climate Change Policy in Bangladesh

Bangladesh has long been active in the UNFCCC process and a series of policy and institutional changes undertaken by the Government in recent years. Bangladesh produced its National Adaptation Program of Action (NAPA) in 2005 and was a lead player on NAPAs in the UNFCCC. The Government of Bangladesh (GoB) prepared the Bangladesh Climate Change Strategy and Action Plan (BCCSAP) in 2008/9 to provide strategic direction on climate change. Prior to BCCSAP formulation, GoB formulated a number of national and sectoral strategies and action plan including the national water management plan, the national biodiversity strategy and action plan for Bangladesh and national environmental management plan including climate viabilities (Planning Commission, Ministry of Planning, Bangladesh, 2012).

So the key climate policy developments in our country include

- National Adaptation Programme of Action (NAPA) (2005 and revised 2009)
- Bangladesh Climate Change Strategy and Action Plan (BCCSAP) (2009)
- Climate Change Unit in Ministry of Environment & Forests
- Climate Change focal points established in relevant ministries
- (Planning Commission, Ministry of Planning, Bangladesh, 2012)

Bangladesh has taken several steps in recent years to embed climate change in national policy making and as regards policy and strategy making process in Bangladesh, experience so far suggests that most policies are driven by expert and bureaucrats, again following a top-down process. While participation of stakeholders has significantly increased, quality of participation of poor people appears to have remained unsatisfactory (Planning Commission, Ministry of Planning, Bangladesh, 2012).

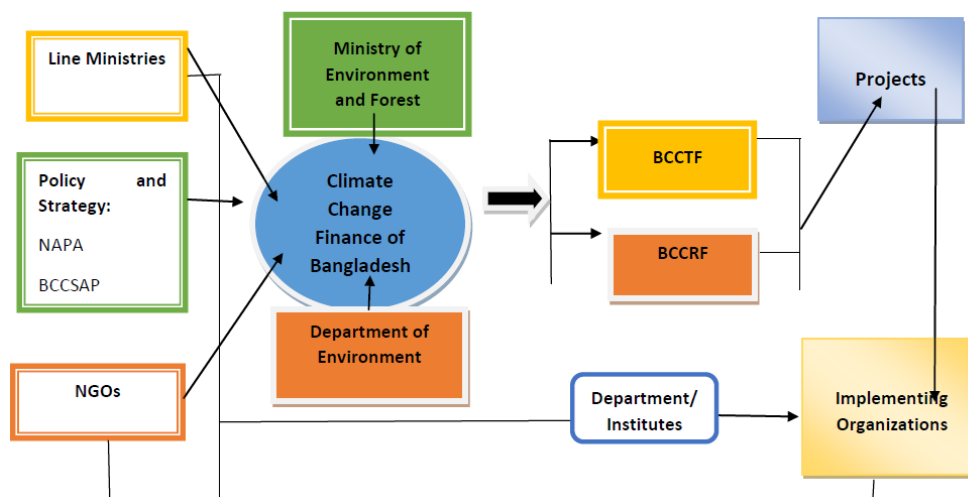


Figure: 1. Climate Change Finance and Government Agencies

- According to the CPEIR, 37 ministries/divisions have some link with climate change related activities either of non-development or of development nature or both. The reason which work behind the leading role of MoEF is the rule of the Allocation of Business among the Different Ministries and Divisions (1996, revised up to August 2000), the Planning, regulation and coordination of environmental and forestry programmes are the major activities of Ministry of Environment and Forest (Cabinet Division, Government of the People's Republic of Bangladesh 2000). Climate Change has been seen as the environmental issue here, so the leading ministry to deal with the climate finance is the MoEF. But now a days, climate change issues are being seen as the development issue (no more environmental issue).
- As we discussed that the 37 ministries/divisions have some link with climate change related activities either of non-development or of development nature or both, then the climate finance issues should be governed by the Planning Ministry. Because when any issue is the matter of the involvement of more than one ministry that should be the matter of the Ministry of Planning and should follow the development budgetary procedures. So here comes the issue of decentralizing the role of MoEF in the policy making of climate related activities. Here comes the issues of the aspects of coordination within the government. There should be three types of coordination for the better climate change related policy adoption in our country and those are:
 - Policy Coordination: the achievement of balanced influence between sector policy and climate change policy. This should be the role of the Planning Commission.
 - Technical Coordination: This role lies with MoEF at the moment and has evolved from an environmental mandate.
 - Financial and Performance Coordination: This role lies with Finance Division and is implemented via the MTBF which acts as the governance and performance management mechanism, as well as matching resources to policy. So the finance division should play a crucial role in the coordination of funding.

So the Synergies between institutional roles and responsibilities for climate change planning need to be encouraged.

5. POLICY MAKING PROCESSES REGARDING BCCTF AND BCCRF:

5.1 Policy Formulation

The Planning Commission is the central planning body of Bangladesh responsible for macro and micro economic plans and policies. When it comes to a sectoral policy and plan, the Ministries are responsible for the policy formulation, planning, evaluation, and execution. In Bangladesh, the climate change is still considered as an environmental issue. This implies that the climate change planning should be led by the Ministry of Environment and Forests. But the planning and management of BCCSAP initiated a special nature that differs from the regular national planning appraisal, approval and financing process. Two different governance and management infrastructures have been created for appraisal, approval and monitoring of projects under BCCSAP. The projects that will be financed from the National Trust Fund with GoB's own funds will be managed by the Climate Change Unit in MoEF and NGO funded by the PKSf (Palli Karma Sahayak Foundation). The second set was created for the projects to be financed by donor grants/ the BCCRF and governed and managed by an evolving new system with the involvement of GoB, participating donors and World Bank as the Trustee of Fiduciary service provider.

5.2 Fund Approval and Release

BCCTF: the Trustee of BCCTF enjoys the supreme authority for project approval after being assessed by the Technical Committee. Trustee Boards approves project in their regular meeting through a detail discussion on each of the submitted projects before them. Once projects are approved MoEF, the secretariat of this Board, send fund request letter to the Ministry of Finance. The fund request letter includes list of approved projects, name of the implementing organization and other related documents. As per demand the MoEF provides fund in favor of BCCTF Trust account. As the Secretary of Ministry of Finance is a member of BCCTF Trustee Board, so no prior and additional approval is required for fund release from the Ministry of Finance.

BCCRF: BCCRF is implemented in line with the agreed implementation manual, and considering grant requests submitted by various line ministries and other eligible institutions. The projects grants

approved for government implementing agencies are governed by a legal agreement between the Bank as and the recipient, defining the eligible Activities and Expenditures/Disbursement Categories. Funds may be used only for the purposes and activities described in the Grant Agreement, ensuring that expenditures are incurred using the Bank's procurement and financial management guidelines.

5.3 Coordination in Fund Approval and Management

Projects undertaken by government ministries and departments are monitored by the monitoring wing of the respective ministries under the guidance of a Joint Secretary. On the hand NGO projects are overseen by the PKSf on the basis of PKSf's own financial management policy and only on the basis of bilateral agreement between PKSf and the fund recipient NGO.

The project year are best aligned with the government's budget cycle. The project budgets are prepared by grant seeking agencies which are further reviewed and finalized with the assistance of CCU staff, on the basis of the government's procurement and sectoral implementation plans. But so far no guideline is available in any published sources regarding the responsibilities of CCU.

In case of BCCRF, the Secretariat and the World Bank Team plays role in coordinating partners, maintaining and monitoring a processing schedule and accelerating along the process to prevent slippage.

As per the BCCRF implementation manual Bank team, with members of the Secretariat, would undertake regular implementation support mission every six months to review the implementation progress of the grant project activities. The team will review all technical and fiduciary aspects of the project, and consult beneficiaries and stakeholders.

Monitoring, Verification, and Reporting

In relation to BCCTF, the CCU has already developed a framework for verification and assessment of project implementation. But monitoring mechanism of NGO projects funded through PKSf is yet to develop.

On the other hand, BCCRF funded project expenses will be audited by the Comptroller and Auditor General (CAG) of the government of Bangladesh. BCCTF Trustee also could employ third party auditing firm. Aside with monitoring and reporting measures from government, the Bank will do monitoring and reporting out of their responsibility of fiduciary service provider on behalf of the contributors to the fund. The Bank will provide the donors with an annual report on the financial and physical progress of activities and also will provide annual single audit, comprising: 1. a management assertion together with an assentation from the World Bank Group's external auditors concerning the adequacy of internal control over cash based financial statement for all cash-based trust funds together with the external auditor's opinion thereon. The cost of such attestations shall be borne by the Bank.

6. ASSESSING THE PRESENT CLIMATE POLICIES AND PROCESS

- Therefore, there remains a tension among the Ministries over climate change related issues owing to the tension that exists between the development of policy and the differences in budget between institutions. This situation makes the case for clarification and specialization of mandates and for strengthening the interface between key institutions.
- The intra-government coordination mechanism is a limitation. Bureaucracy appears to have hindered progress in this regard which points towards a real imperative in developing these.
- Currently, the main responsibility to foster adaptation lies with the lead institution, Ministry of Environment and Forest (MoEF). Unfortunately, its performance so far appears to have not been satisfactory for many reasons, such as weak structure, duality in mandate, lack of manpower, trained human resources and weak legal framework. It is argued that the MoEF has neither a clear legal mandate as yet, nor specific Rules of Business to lead all the activities centered on climate change in the country.
- It is encouraging to note that the NGOs of Bangladesh have been playing an important role in reducing climate change induced hazards. Some of the NGOs are engaged in massive public awareness campaign including preparedness training on climate change and sea-level rise and their impacts. There is also insufficient capacity of local bodies to plan and manage climate related projects continues to remain a major challenge to improve on climate vulnerability.

- In addition to intra-government co-ordination, the co-ordination between institutions i.e. national, regional and local governments would appear to be quite limited, undermining the effectiveness of the results that the project outcomes are designed to achieve. This is perhaps best evidenced by the absence of climate change references in the MTBF of Local Government.
- The involvement of the private sector is at its initial stage, and offers a lot of potential opportunities. The functioning of Local Consultative working groups is yet to gain momentum. Bangladesh has not formulated a policy in relation to private sector involvement in Climate Change and has not set any target of preferred mix of funding or delivery modalities. This perhaps is a stage that should be considered more fully in the development of a National Climate Fiscal Framework.
- Policy and strategy making process in Bangladesh, experience so far suggests that most policies are driven by expert and bureaucrats, again following a top-down process while participation of stakeholders has significantly increased, the quality of participation of poor people appears to have remained unsatisfactory

Analysis of policy and programmes in many Ministries shows how wide and strong the connections are to climate change. Climate change impinges on the responsibilities of a wide range of Ministries although the Ministry of Environment and Forests has the lead. Accordingly, in recent years a large number of investments have been made by a range of Ministries, for example in coastal infrastructure and crop development which provide a base from which to improve climate resilience. The active disaster risk management agenda has been a long running focus for development, and helped put in place some local planning processes and policy transformations which help provide resilience for climate change.

Capacity Issues of MoEF (Ministry of Environment and Forests)

MoEF does not have a track record as a spending ministry. According to various sources accessed, there is a major problem with coordination across the ministries. Whilst there is some interest in accessing the climate change funds that apparently will be available, the convening capacity of the MoEF is weak, in part because it is not a high-ranking ministry represented in Cabinet. It was evident from the interviews that this issue has been widely discussed across the several groups that were interviewed. On the positive side, one major international development organization reported that, compared to other countries involved in the World Bank-led PPCR, MoEF had effectively coordinated other Government ministries for the programmes development.

Increasing capacities of professional and technical staff is not a straightforward task. Civil service procedures can slow the creation of new posts, and the internal career path can mean frequent moves of key staff – this point has apparently been discussed at the Bangladesh Development Forum. Externally funded projects rely on consultants, who get paid more than civil servants, and who can move to other projects, so that the processes of building organizational learning and institutional memory is undermined. Ironically too, Bangladesh's international profile on climate change, which it has been developing, is potentially undermining immediate progress in the country. Key staff are always 'either going or gone' to climate change meetings outside the country according to one organization. Basically, as there is a legacy of under-spend on aid in general including climate change increasing professional and technical capacity for project development is vital.

Donor Capacity Issues

Capacity for coordination is not just a problem for the GoB – donors also face problems. This issue is covered in more detail in the following section within the discussion about the aid effectiveness process. Comparatively few donors have been operating on a wide scale in Bangladesh. For the most part, donors have been operating in well-established niches and have developed their own various ways of working with the governance and accountability challenges. Donors are grappling with problems about how to spend their money wisely and where climate change fits in with longer running programmes.

7. CONCLUSION

In Bangladesh, we see that Government has taken different policies in formulating climate change related strategies and actions plans for undertaking adaptation measures. In this regard the policy makers of Bangladesh with the supervision of government develop the policies regarding climate

change. In Bangladesh the policy making process regarding climate change come with a linear model where we see different steps: problem recognition, identification comparison of alternative responses, decision making, implementation, evaluation and possible amendment. The main responsibility of the implementation of climate related policies lies with the lead institution Ministry of Environment and Forest (MoEF). The reason which work behind the leading role of MoEF is the rule of the 'Allocation of Business among the Different Ministries and Divisions' (1996, revised up to August 2000), the Planning, regulation and coordination of environmental and forestry programmes are the major activities of Ministry of Environment and Forest. Climate Change has been seen as the environmental issue here, so the leading ministry to deal with the climate finance is the MoEF. But now a days, climate change issues are being seen as the development issue (no more environmental issue).

Currently, the main responsibility to foster adaptation lies with the lead institution, Ministry of Environment and Forest (MoEF). Unfortunately, its performance so far appears to have not been satisfactory for many reasons, such as weak structure, duality in mandate, lack of manpower, trained human resources and weak legal framework. It is argued that the MoEF has neither a clear legal mandate as yet, nor specific Rules of Business to lead all the activities centered on climate change in the country.

Analysis of policy and programmes in many Ministries shows how wide and strong the connections are to climate change. Climate change impinges on the responsibilities of a wide range of Ministries although the Ministry of Environment and Forests has the lead. Accordingly, in recent years a large number of investments have been made by a range of Ministries, for example in coastal infrastructure and crop development which provide a base from which to improve climate resilience. The active disaster risk management agenda has been a long running focus for development, and helped put in place some local planning processes and policy transformations which help provide resilience for climate change.

Under the present conditions of the climate finance of Bangladesh, the development of a national climate fiscal framework is a high priority to ensure allocative efficiency and effective transaction of strategy to both policy and budgets.

There is also a case for strengthening the co-ordination and transaction of climate policy, finance and delivery between the levels of government and the various non-government institutions, including the private sector, involved in climate change in Bangladesh. It is also important that the private sector and civil society organizations create more inclusive partnerships so that all their efforts are coherent and have greater impact on reducing climate vulnerability. Existing institutions that could potentially be developed in this regard could include the Ministry of Industry and the NGO Bureau.

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AUTHOR'S BIOGRAPHY



Nushrat Tashmin, is a Lecturer in the Department of Sociology and Anthropology at Green University of Bangladesh. She has completed her graduation in Anthropology from University of Dhaka. She has conducted her academic research in the field of Anthropology of Climate Change from culture of policy making perspectives. Prior to her faculty position in Green University of Bangladesh, she worked in the Policy & Advocacy Department of Oxfam in Bangladesh and Research Wing of Development Frontiers.