

**Proposed Asian Development Bank Multitranche Financing Facility
Flood and Riverbank Erosion Risk Management Investment Program
(Bangladesh)**

United States Position
June 26, 2014

Water-related disasters are a chronic threat in Bangladesh, with floods, riverbank erosion, drought, cyclones, and tidal surges affecting the country perennially. Riverbank erosion alone can affect 100,000 people annually. It especially impacts the landless poor who are most likely to occupy the riverbank areas, forcing repeated displacement and loss of livelihoods.

The United States supports the objectives of this investment program. The United States recognizes the dire impacts of water-related disasters in a country as densely populated as Bangladesh, especially on the poorest. The United States believes that the proposed approach, including institutional capacity strengthening, may be the best way to tackle perennial flood and riverbank erosion risks and to provide near-term assistance to locations in need of urgent attention. The United States hopes that this program will have a material impact in improving livelihoods and the economic prospects of beneficiaries in the project area.

However, the United States has concluded that this project is not consistent with its domestic legislative mandate regarding projects classed as Category A for environmental impacts. To meet this mandate, a cumulative strategic assessment of environmental impacts would have to have been completed for all planned improvements and new embankment construction. Such analysis in turn could have informed comprehensive environmental impacts analyses and the project design of all three tranches of this MFF.

While the United States accordingly sees scope for improving the environmental analysis and mitigation measures underlying this project, there are nonetheless many laudable elements of its design. The United States commends the Bank for including NGOs during implementation, to support community mobilization and stakeholder participation activities. The United States believes community-based management units—responsible for disaster-resilience action plans and for overseeing sustainable operation and maintenance of project works—are elements critical to the success of the project. And the United States hopes that institutional capacity strengthening can aid the government of Bangladesh in managing and mitigating flood and riverbank erosion risks over the longer term.

With these comments, the United States wishes to be recorded as abstaining on this proposed investment program, in accordance with its legislative mandate.