

COMMENTS OF NON GOVERNMENTAL ORGANISATIONS CONCERNING THE NEW PARTNERSHIP STRATEGY WITH THE COUNTRY FOR 2010-2014

1. The non governmental organizations welcome the initiative of the Asian development bank (ADB) on cooperation with the civil society of Tajikistan by development of the new partnership strategy with the country (CPS) for 2010-2014. We also wish to note the positive response of the Bank on the request of the non governmental to provide them with the copy of the Draft Strategy and to allow sufficient time for the civil society to prepare comments and recommendations for the strategy. But at the same time ADB failed to provide sufficient time for commenting period of the document, as it is prescribed by Public Communication Policy para 66, which says ADB need to provide publicly available period amounting 12 month for safeguard policies and sector/thematic strategies, while country strategy is also subject for the same requirements of para 66.

2. Although ADB states in the strategy, that all projects implemented within the limits of the previous strategy, have been assessed as "satisfactory", this assessment raises serious doubts on part of the civil society. So, civil society representatives many times have been trying to draw attention of the Bank to the problems of the projects (the project of reconstruction of the road Dushanbe – Kyrgyz border; the project of educational sector reform; the irrigation project; the project of construction of the micro hydro power stations, the HPSs). The representatives of the Bank have also informed during the public hearings, that at least two project of HPSs construction were unsuccessful. In that respect it is not clear why the Bank has assessed the projects as "satisfactory". It gives us the grounds to believe, that the assessment of the projects carried out by the Bank is disinterested and does not reflect the reality. We suggest the Bank to consider a possibility of involving of truly independent experts from among the civil society representatives in monitoring and evaluation of the implemented projects that would allow the Bank to obtain information about the projects from independent sources and to improve the quality of assessment.

3. Despite of the fact that the Bank also states, that the Final Review of the Strategy and of the Country Program (S-andCP) for the period 2004-2008 has shown the improvement of the systems of energy and transport infrastructures, thanks to the assistance provided by the ADB, this statements also raises some doubts. Thus, the energy crisis in the winter of 2007-2008 has shown, that true situation in the power sector is not so optimistic. The food crisis which followed also calls into question any improvements in agricultural sector of the country. On the contrary, these crises have shown a true picture of the developments. We believe that it is necessary for the Bank to have more realistic approach to the assessments that are used in order to justify interventions in certain sectors. Such overestimated assessments prevent to predict adequately the situation and, as a consequence, they mislead potential investors.

4. According to the assessments of the Bank, many public (state) agencies work inefficiently with low transparency, and the anti-corruption capacity is not of a high quality. Thereupon, it is not clear why the Bank constantly increases funds to such institutions. It would be more rational to increase a portfolio of investments into the private sector instead of the public sector.

5. In spite of the fact that the Bank includes the clean and renewed energy in the expected outcomes of the new strategy, the Annex 1 to strategy (the CPS framework of outcomes) provides construction, by 2014, of the power station working on coal. The Tadjik environmental organizations have expressed many times their negative opinion concerning implementation of such projects that violate the obligations taken by the government about voluntary reduction the greenhouse emissions. We think that it is necessary for the Bank to reconsider its participation in funding of the given project which would call into question the intention of the Bank to achieve the goal of having clean and renewable energy in the Republic.

6. Civil society has also many times expressed its vision of the prospects of development of export capacity of the country in electric power industry. High level of corruption and lack of transparency of the public structure, including Barki Tojik and ministry of Energy and Industry, put under the serious doubt the prospect of obtaining the true revenues from the export of electric power to Afghanistan and further to Pakistan and appropriate use of these revenues for the purpose of development of the Republic. Besides, assessments of the export capacity also might be too optimistic in connection with growing losses in the country power system. The out-of-date generating and distribution infrastructure will further increase the technical losses in the grid of the Republic, and the lack of transparency in the tariff policy would lead only to growing social pressure, discontent of the society and growth of economic losses (in other words people would not pay). Electric power export targets in the long term also put serious obstacles for development of local industry which also needs cheap energy.

7. In accordance with Section 2, Strategic Framework and Operational Priorities, “ADB will work on energy, transport, and the reform agenda. Crosscutting themes include regional cooperation, capacity building and governance, especially public financial management, procurement, and anticorruption activities, climate change and the environment, and gender mainstreaming.” Then in point 24, ADB wrote about “(iv) support for institutional and tariff reforms. ADB is working with Barki Tajik to improve its performance, including increasing cash collections and maintenance and cutting technical losses. The reform agenda includes better and more predictable legal and regulatory frameworks, a revised tariff regime, better governance, and more private sector participation.” The main issues in these strategic approaches of ADB contradicted each other: anticorruption activities should follow with public monitoring and raising accountability of Barki Tojik. It is impossible to achieve better governance without transparency and wide public participation in all decisions, regarding electricity sector on all levels. The effectiveness of such reform depends on public awareness about the rational behind it, in particular of the tariff increases, followed by a strengthening by accountability of the energy suppliers, overall transparency and legality in mutual relations with energy consumers through shared constant consumer representation. The general public should be involved in the discussion of the problems in the energy sector and implications of the energy crisis. **Recommendation:** including as part of better governance measures and reforms directed on promoting transparency and accountability of Barki Tojik, as well as transparency of reform process and decision making.

8. In connection with the plans of the Bank to continue financing of the transport infrastructure, the civil society draws attention of the Bank to the quality of the works. So for example, experience of the project of reconstruction of Dushanbe- Kyrgyz border road totaling to 45 million dollars, has shown the poor quality of the executed works. Many sections of the road have already collapsed despite the fact that the project has not been finished yet. We ask the Bank to pay special attention to the quality of works in the given sector and to proper selection of contractors of the works as the given projects lay down the burden of a debt on the local tax payers.

9. We ask the Bank also to be more cautious in application of the Public-Private Partnership instrument (PPP). PPP Experience when the road Dushanbe-Chanak was allowed to be managed by the private company has already led to growth of discontent of the citizens of the Republic because the company has established unreasonable toll for use of the road, provided that there is no alternative road. If the Bank is intended to implement the PPP initiatives, especially in the transport sector, it is necessary to provide people with alternative in the form of a free road. Only in that case the PPP development is possible, including in the other sectors.

10. In the review of the program the Bank gives the general description of the proposed projects in public and private sectors, including TAs. Here it is necessary to provide the accurate description of the projects including the name of projects, the amount of funds, implementation site, and proposed dates for completion. Also it is necessary to reveal all analytical and research works planned by the Bank for the period of implementation of the strategy so that the public at an early stage could obtain information about the plans and be involved in decision-making.

11. Practice of raising awareness of public and of the other stakeholders by means of the website is rather wide with no doubts. However often the communities affected by that project cannot use the given resource. For Tajikistan, with its problems in the energy sector and with poverty and low education level, with poor access to Internet, the given problem is very pressing. We suggest the Bank to consider the new ways of informing the public, including publications in local mass-media and carrying out of public hearings with local communities and non-governmental groups.

12. Language problem remains relevant. Out of all operational documents of the Bank more than 90 % are available only in English. It is customary to translate the general information on some languages, but the information on the projects or about assessments is translated seldom. Accordingly the right to know is reduced here to a possibility to speak and read in English. We suggest the Bank, in addition to translation of all country documents on the language of this country, to translate documents upon the request. In the first case it is possible to take advantage of the initial information which was provided earlier by the country and which then was translated into English that would reduce the costs and time for translation. As to translations upon request, it is not very costly and deadlines could be established.

13. Non-governmental organizations address the Bank with the request to translate into Russian and Tadjik languages the following documents:

- 1) Economic assessment
- 2) poverty level assessment
- 3) gender assessment
- 4) Environment assessment
- 5) Private sector assessment
- 6) Sector assessment
- 7) Plan risk sector assessment and risk management
- 8) Country and portfolio indicators
- 9) Progress in achievement of Millennium development plans and goals
- 10) Economic indicators on the country
- 11) Indicators of poverty level and social indicators of the country
- 12) Environment indicators of the country
- 13) Matrix of development co-ordination
- 14) Portfolio indicators – portfolio amounts and ratings
- 15) Portfolio indicators – spending and net flows of resources
- 16) Indicators of success of projects
- 17) Rating of country indicators
- 18) Structure of co-funding for the country and relevant parameters for expenditure funding
- 19) Final review of the Country Strategy and Program for 2004-2008.
- 20) Business plan of country operations for 2010-2012
- 21) Joint performance review of country portfolio
- 22) Assessment of regional cooperation and integration

14. Civil society organizations have a hope, that our comments do not remain without attention of the Bank and would enable it to develop the effective strategy of partnership with the country. We also hope, that the Bank would improve further the mutual cooperation with the civil society organizations and involve them in decision-making about the projects, strategies and policies of the Bank aimed on improvement of social and economic situation in Tajikistan.

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