



1. Project Data

Project ID P105403	Project Name GZ-Second Land Administration	
Country West Bank and Gaza	Practice Area(Lead) Social, Urban, Rural and Resilience Global Practice	
L/C/TF Number(s) TF-12104,TF-13714,TF-95164	Closing Date (Original) 30-May-2017	Total Project Cost (USD) 8,740,000.00
Bank Approval Date 26-Apr-2012	Closing Date (Actual) 18-Apr-2016	
	IBRD/IDA (USD)	Grants (USD)
Original Commitment	8,481,001.09	8,481,001.09
Revised Commitment	3,130,299.15	3,889,119.82
Actual	3,212,342.55	3,212,342.55

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2. Project Objectives and Components

a. Objectives

This project has two Financing Agreements (FAs): (1) a grant from the World Bank Trust Fund for the West Bank and Gaza (FA1), and (2) the co-financing grant from the Government of Finland (FA2). Both FAs and the Project Appraisal Document (PAD) indicate the following Project Development Objective (FA1, page 6, FA2, page 4, and PAD, paragraph 14), which serves as the basis for this ICR Review:

" To improve the design and implementation of the land registration system in the project area."

The PAD further defines the project area to include municipalities, villages, and project committees in the Dura district and in an adjacent area of not less than 180,000 dunums. A dunum is a unit of measure of land, roughly equivalent to an acre.



The key Project Development Outcome Indicators are: (i) increase in customer satisfaction with land registration services delivered by the Palestinian Land Authority (PLA) in the Project Area; (ii) decrease in time required for transaction processing in at least four PLA offices; and (iii) at least 60% reduction in the costs of land registration activities in the Project Area by Project end (PAD, paragraph 16 and ICR, paragraph 5).

b. Were the project objectives/key associated outcome targets revised during implementation?

No

c. Will a split evaluation be undertaken?

No

d. Components

1. Systematic Land Registration in the Project Area (US\$ 6.92 at appraisal, which consisted of US\$ 2.41 from FA1 and US\$ 4.52 from FA2; US\$ 2.27 million actual, with no breakdown reported) financed software and equipment for land demarcation, adjudication, surveying, and registration and consulting services for public awareness campaigns and the operating costs of the implementing entity, the Palestinian Land Authority (PLA).

2: Institutional Strengthening of the Palestinian Land Authority (PLA) (US\$ 0.63 million at appraisal which consisted of US\$ 0.28 million from FA1 and US\$ 0.35 million from FA2; US\$ 0.33 million actual, no further breakdown reported). FA1 funded (i) the modernization of the PLA offices through design, civil works, equipment, installation of systems and other improvements, and (ii) the preparation of an information technology (IT) strategy, software to extend the Computerized Land Registration System (CLRS), and upgrade survey equipment for the PLA Surveying Department. FA2 supported (i) the improvement of the land registration process, (ii) a feasibility study for a Continuous Operation Reference System (CORS), and (iii) the extension of the Computerized Land Registration System to four regional offices (Nablus, Jenin, and two others).

A parallel technical assistance grant funded by the Government of Finland (Euros 4.2 million or US\$ 5.8 million at appraisal, PAD, paragraph 28, ICR paragraph 13) supported the preparation of Corporate and Business Plans, Human Resources and Training Strategies under this component. This grant also funded Monitoring and Evaluation (M&E) activities under component 3 below although the allocation of resources between the two components are unclear.

3: Project Management, Monitoring and Evaluation (US\$0.956 million at appraisal, composed of US\$ 0.077 million from FA1, and US\$ 0.879 million from FA2; US\$ 0.46 million actual, no further breakdown reported) financed project management, training and a monitoring and evaluation system (M&E). As noted above, a portion of the separate parallel grant funding from the Government of Finland supported M&E activities that would form the basis for the project's M&E system.



e. Comments on Project Cost, Financing, Borrower Contribution, and Dates

Project Cost: The project was appraised at US\$ 8.5 million, excluding a Project Preparation Facility advance of US\$ 0.24 million, with actual project costs reaching US\$ 3.2 million or 38% of appraised costs. The rest of the funds were cancelled (US\$ 1.6 million and Euros 2.6 million or US\$ 3.7 million for a total of US\$ 5.3 million) because of continuing noncompliance by the Palestinian Authority with the provisions of the Financing Agreement.

Financing: The project is a Specific Investment Loan financed by two grants - a US\$ 3.0 million from the World Bank Trust Fund for the West Bank and Gaza (established in 1993 as the Bank's mechanism for funding assistance to the territory), and a US\$ 5.74 million co-financing grant from the Government of Finland. A parallel financing of US\$ 5.8 million was provided by the Government of Finland.

Borrower Contribution: There were no borrower contributions.

Dates: The project became effective on June 19, 2012 and was scheduled to close on May 30, 2017. Funds were suspended in November 2015 because of continued non-compliance by the Palestinian Authority with the stipulations of the FAs (ICR, paragraph 13). Specifically, these stipulations are that the PLA will: (i) maintain a Project Management Unit with adequate resources; (ii) maintain a Project Steering Committee; and (iii) monitor, evaluate, and report on project progress based on agreed upon indicators. A Mid Term Review was conducted in November 2014. The project was cancelled on March 10, 2016 because of continued non-compliance with these provisions.

3. Relevance of Objectives & Design

a. Relevance of Objectives

The objective - ***to improve the design and implementation of the land registration system in the project area*** - remains relevant to the Palestinian National Development Plan for 2014-2016 entitled State Building to Sovereignty which notes under Section 3, Good Governance and Institution Building (p. 49) that the government would strengthen governance and in particular, focus on land administration (p. 50). In addition, the objective is relevant to the country's ambitious reform efforts to build an institutional basis for a future Palestinian state. Areas A and B which form part of the project area and which is under the direct control of the Palestinian Authority, the improvement of land management practices will enable scarce land to be utilized optimally, facilitate economic growth, and allow for security of land ownership (ICR, paragraph 1).

The objective also remains relevant to the Bank's Assistance Strategy for FY 15-16. The objective supports the Bank's strategy's results monitoring framework under Pillar 1 - strengthen the institutions of a future state to ensure service delivery to citizens, particularly under Outcome 1.2 - increased transparency and



accountability in service delivery (Assistance Strategy, paragraph 60). In particular, the objective will support the selected outcome indicator for efficient and transparent land registration operations, i.e., monitoring indicator 6 - the number of land transactions processed per month by the Palestinian Land Authority's regional offices with a target of 28 ,000 transactions a month in 2016, compared to a baseline of 2,170 transactions in 2014 (World Bank Assistance Strategy, p. 26).

Rating

Substantial

b. Relevance of Design

This project is the second phase of the Land Registration System. The project's design incorporates lessons learned from the first phase. These lessons include (i) focusing only on activities that are under the control of the Palestinian Land Authority; (ii) avoiding components that require legislative change; (iii) using performance indicators that refer to the volume of land registered (reflecting tenure security) rather than the number of titles issued (may include previously titled but newly sold or mortgaged property); (iv) developing a sound dispute resolution and adjudication system which integrate villages, neighborhoods, and municipal councils into the dispute resolution process (ICR, paragraph 15).

The causal chain is straightforward in terms of linking the investment and technical assistance activities financed by the project, to the expected outputs, the resulting intermediate and final outcomes, and the achievement of the ultimate development objective. The objective is clear, and the results framework actionable but there were shortcomings in setting targets, orienting activities toward meeting the outcome and identifying actions that would mitigate risks (ICR, paragraph 41). For example, the proposed targets have never been reached by the PLA even in their self-financed work (PAD, paragraph 45, ICR paragraph 18). At the same time, the PLA did not have sufficient staff and had limited experience in the World Bank's procurement, financial management and reporting needs. During the 2014 Mid Term Review, the team concluded that lack of sufficient commitment to the objective rather than the technical outcome indicators was the key bottleneck and decided against adjusting the results framework. The team determined that outsourcing land registration activities would speed up implementation.

Rating

Modest

4. Achievement of Objectives (Efficacy)

Objective 1 **Objective**



To improve the design and implementation of the land registration system in the project area (i.e., municipalities, villages, and project communities in the Dura district and adjacent areas of not less than 180,000 dunums).

Rationale

OUTPUTS:

- Increase in customer satisfaction with services provided by the Palestinian Land Authority (PLA) in the project area reached 75.75% based on 1 of 3 surveys (the target was a 30% cumulative increase based on 3 surveys, with insufficient data, unmet).
- The time required for land transaction processing in at least four PLA offices decreased from a baseline of 24 days to 30 days (the target was 15 days, unmet).
 - Average number of days to complete the recording of purchase or sale of property under the land administration system both rural and urban, reached 30 days on average (the target was 15 days, unmet).
- From a baseline of US\$ 86 in rural areas and US\$ 138 in urban areas, the costs of Systematic Land Registration activities in the project area was reduced to US\$ 22 (the target was US\$ 35, achieved).
- In the Dura district 74,031 dunums were surveyed with 18,023 dunums were digitized (the target was 180,000 dunums, unmet).
 - the project recorded ownership rights for 19,920 dunums (the target was 80,000, unmet).
 - the project recorded ownership rights for 6,081 land parcels (the target was 30,000, unmet).
 - the project recorded 608 land parcels as female-owned or led (the target was 15,000, unmet).
- The following documents were prepared but not yet adopted: (i) a Corporate Strategy for 2015-2019 and Bi-Annual Business Plans (2015-2017) for the General Directors of Surveying, Settlement, State Lands, Human Resources, and Information Technology; (ii) a Code of Conduct and Service Standards, (iii) a Human Resources Development Strategy, and (iv) a Training Plan. The PLA prepared and adopted an Information Technology strategy but it is not yet operational (ICR, p. 33, partly achieved).

OUTCOMES:

- The project did not result in any tangible improvements in designing the systematic land registration system. The number of dunums surveyed was low. The automation and use of Information Technology for systematic land registration -- through the Computerized Land Registration System (CLRS) -- did not materialize. Land disputes remained at a high level. Institutional strategies and plans to improve the enabling environment did not materialize (ICR, paragraph 44). The Land Administration Project Phase I produced a Settlement Manual for dispute resolution but this was never implemented (ICR, Annex 2). The Financing Partners did not accept the handbook for dispute resolution mechanisms that the PLA prepared and adopted. The targeted decrease in the percentage of objections presented during the public display period was not met: compared to a baseline of 40%, the level achieved was 14% against a target of 5%. The ICR contests the reported 14% figure.
- The project did not achieve the development of a feasible operational strategy and methods to register all Areas A and B of the West Bank even though there was a reduction in the cost of systematic land



registration (SLR/dunum). Operational inefficiencies persisted as evidenced by consistent low levels of productivity. The average productivity for the 3.5 million dunums to be surveyed and registered in the West Bank would require 564 years to complete (ICR, paragraph 45).

- After a six month delay, the PLA Chairman adopted the Corporate Strategy for 2015-2019 which presented the framework for the development of a reliable and transparent land administration and management system. The ICR reports that the strategy is not yet operational (ICR, Annex 2). The target of incorporating the cadastral mapping system into the PLA's computerized Land Records Management System was not met. The project rolled out the Computerized Land Registration System to two offices (target 4 offices, unmet) but no link was established to the newly designed Computerized Cadastral Mapping System. Land registration data generated by the project was not compatible with CLRS.
- The PLA did not follow up on a media strategy, distribution of publicity materials, and updates of the PLA website about new requirements despite Bank recommendations for activities to improve public awareness and outreach for registration services. A wide range of public stakeholders were not involved in the settlement process as a result.
- The project should have financed the modernization of two PLA regional offices (Hebron and Jericho) but did not achieve this due to high prices of real estate. Major renovations in the PLA offices were also not achieved. The project did not enhance the use of automation in land registration systems although it rolled out CLRS to two offices. The roll out took place too late in the project implementation. The integration between the CLRS and the new computerized cadastral mapping system was not completed by the time the project was cancelled (ICR, paragraph 47).

Rating
Negligible

5. Efficiency

Economic and Financial Efficiency: At appraisal, an economic rate of return of 55% was achieved using the assumed causality between project outputs (titles received by beneficiaries) and creation of affordable housing. The ICR considers as incorrect the original economic model used to justify the economic rate of return, i.e., the 50% increase in land allocated to housing (ICR, paragraph 49). Due to a lack of data, the PLA could not develop an economic model to assess project efficiency based on links between initial registration and an increase in property values or dynamism in the real estate market. In the absence of Net Present Value or Economic Rate of Return analysis, the ICR used cost per unit of output to conduct a cost effectiveness analysis. A simple value for money analysis (using cost of component 1 against the total number of dunums surveyed) reached US\$30 per dunum, considered high against the experience of other similar developing countries which registered at an equivalent of about US\$10 per parcel (ICR, footnote 9).



Administrative and Operational Efficiency: The Palestinian Land Authority (PLA) was not ready to implement the project and displayed weak project management capacity. Project preparation took nearly four years. Lengthy decision making at the PLA led to a year delay in implementing the land registration activities. There were delays in recruiting a Social and Public Awareness Specialist and Procurement Officer, as well as a dedicated Monitoring and Evaluation specialist. This lack of dedicated M&E staff contributed to the poor quality of progress reporting on project outcomes and key performance indicators (ICR, paragraph 34). Timelines or due dates were not honored. The quality of reports were inadequate. Interim Financial Management Reports were submitted on time but were not supported by physical progress reports. In addition, the reluctance of the PLA Directors General to share information with the Project Management Unit showed a lack of ownership of the M&E system. Procurement implementation was marked by inadequate planning, weak institutional capacity, internal bureaucracy, and implementing agency inefficiencies (ICR, paragraph 38). Significant procurement delays affected field work (ICR, paragraph 22) and exacerbated the weak management of field activities.

Efficiency Rating

Negligible

a. If available, enter the Economic Rate of Return (ERR) and/or Financial Rate of Return (FRR) at appraisal and the re-estimated value at evaluation:

	Rate Available?	Point value (%)	*Coverage/Scope (%)
Appraisal		0	0 <input type="checkbox"/> Not Applicable
ICR Estimate		0	0 <input type="checkbox"/> Not Applicable

* Refers to percent of total project cost for which ERR/FRR was calculated.

6. Outcome

The relevance of objective is substantial and that of design is rated modest. Efficacy is negligible. Given the severe shortcomings in achieving the operation's objectives and its negligible efficiency, the project's outcome is highly unsatisfactory. The project was cancelled due to noncompliance by the Palestinian Authority with provisions of the FA.

a. Outcome Rating

Highly Unsatisfactory



7. Rationale for Risk to Development Outcome Rating

The overall risk to development outcome is high because of government commitment, institutional, as well as technical risks. In addition to the fragile political state of the region, government commitment to improvements that have been introduced under the project may not be sustained. There is also a risk that the institutional functions could unravel because of unclear mandates for the Palestinian Land Authority and the Water and Land Settlement Agency. The technical and operational improvements that have been introduced or have been designed may not be fully adopted or implemented. For example, the Settlement Manual is not implemented. Land dispute resolution appears cumbersome with no appetite to implement alternative schemes. Field data are not compatible with the Computerized Land Registration System or CLRS, a local information system without access to land property registry data. There are no transition arrangements for the post-cancellation of investments financed by the Bank (ICR, paragraph 39).

a. Risk to Development Outcome Rating

High

8. Assessment of Bank Performance

a. Quality-at-Entry

This project follows the first Land Administration Project. Three original donors committed to the project but the Government of Denmark eventually backed out because of preparation delays. The Bank and the Government of Finland committed then to finance the second phase of the Land Administration Project with a distribution of funds for specific tasks. With the weak institutional capacity of the implementing entity and delays in project preparation, the Palestinian Authority requested a Project Preparation Facility advance of US\$ 0.35 million to support the appointment of a qualified Project Management Unit, hiring of consultants to prepare the Project Implementation Manual and appoint a Project Implementation and Systematic Registration and Adjudication Advisor (ICR, paragraph 14). Project design was attentive to social development issues, vulnerable groups, and potential challenges with occupants of State Lands (ICR, paragraph 64).

There were significant shortcomings in ensuring quality at entry. Team leadership turnover and withdrawal of one of the original financing partners affected project start up. Project design set overly ambitious targets. The substantial risk posed by the lack of capacity by the implementing entity was mitigated by hiring contract-based field staff to conduct the systematic land registration but this was not based on capacity assessment or prior analytical or feasibility study. Finally, the Monitoring and Evaluation system was weak and its delegation to the Project Director caused quality issues and reporting delays and heavily relied on the Technical Assistance Team (external to the project management unit).



Quality-at-Entry Rating

Moderately Unsatisfactory

b. Quality of supervision

The World Bank team conducted biannual supervisory missions. Two team leaders and co-team leaders were based in the West Bank during the three-year implementation period which allowed regular interaction with the Government, the implementing entity, and the technical assistance team. However, there was high turnover of team leaders, involving four during the life of the project, which contributed to the lack of collaboration with the consulting firm hired by the Government of Finland and affected the consistency of recommendations between project operations and technical assistance (ICR, paragraph 68).

Supervision of fiduciary aspects, particularly in the area of procurement, was lacking. To speed up implementation, the Bank team helped prepare bid documents for the systematic land registration of 90,000 dunums, which proved to have overestimated the availability, capacity, and efficiency of the private sector to implement this project. No bids were received in the end with no further explanation pursued. There were delays in procuring vehicles to be used by field staff. The Bank did not proactively address the project implementation challenges such as the lack of staff, or ability to retain staff, deficient monitoring and evaluation of the results framework (see Section 10 below), lack of information sharing, and the lack of cooperative mechanisms among the Financing Partners Bank, and the implementing agency.

A Mid Term Review was conducted in November 2014 which resulted in monthly and bi-weekly meetings with the PLA Directors General, the project management unit, and the Settlement Team in Dura as well as intense high-level meetings with the Prime Minister's Office to address performance. By the time of the MTR, it was evident that the project targets would not be achieved but the financing partners were not convinced that the project needed to be restructured. The Bank concluded that reporting on the Results Framework had shortcomings but no changes to key performance indicators or results were introduced with the assumption that appointing an M& E expert after the MTR would result in better reporting.

No specific transition arrangements were made for the post-cancellation of investments financed by the Bank (ICR, paragraph 39).

Quality of Supervision Rating

Moderately Unsatisfactory

Overall Bank Performance Rating

Moderately Unsatisfactory

9. Assessment of Borrower Performance

a. Government Performance

The Government requested a follow-up to the first phase of the Land Administration Project. Given lack of capacity and lack of commitment from the implementing entity, the PLA, the Government had to demonstrate its commitment to the project by completing the systematic land registration activities in the



Bethlehem and Salfit Governorates using its own resources (ICR, paragraph 17). Nevertheless, lack of government commitment became evident when its Project Management Unit did not receive adequate resources to be fully staffed with qualified personnel.

From project identification through appraisal, strong government support (ICR, paragraph 64) was anchored on the project being strongly aligned with the Palestinian National Development Plan (ICR, paragraph 70). In April 2008, the Palestinian Cabinet approved the National Land Policy Framework which called for a Board of Directors for the Palestinian Land Authority. The Government did not establish this Board. Instead, the Government established a project Steering Committee which included the Palestinian Land Authority, the Ministries of Finance, Planning and Administrative Development, with the Finnish Ministry of Foreign Affairs as observer. This Committee was tasked with meeting bi-annually to review implementation progress and approve annual project plans. This Steering Committee met bi-annually but did not fulfill its strategic decision-making mandate (ICR, paragraph 70). By the time of the Mid Term Review in November 2014, the financing partners demanded a change in the composition of the Steering Committee and a revision in its Terms of Reference to ensure a more proactive oversight of the project. The Steering Committee never met after the MTR. In addition, the project called for organizing a Land Council advisory group consisting of community and local government officials, which was never organized.

Government Performance Rating

Unsatisfactory

b. Implementing Agency Performance

The PLA implemented the project. Throughout project implementation, the PLA failed to attract, and in some cases, retain qualified personnel to have a fully functional project management unit. There was also low staff morale due to delayed payments of salaries and benefits. After the Mid Term Review, an incentives plan for field teams to address staffing issues were approved by Financing Partners but never implemented. (See also Section 5 above on "Administrative and Operational Efficiency")

The PLA's institutional weaknesses were known from appraisal. Cooperation with Bank team and their consultants during preparation was challenging. PLA staff were unfamiliar with the technical registration procedures. The PLA was reluctant to adopt the project targets reflecting a lack of commitment to achieving the development objective. The implementing agency did not share data and information with Financing Partners including the customer satisfaction survey, a development outcome indicator. Decision making was centralized with the Project Director appointed by the PLA Chair as a contract-based advisor rather than a technical civil servant as recommended by the Financing Partners. The Project Director rarely consulted Directors General of departments on functions or tasks that related to their respective departments. There were shortcomings in the timely resolution of implementation issues. Monitoring and evaluation arrangements were insufficient. Reporting on M&E data to serve decision-making and resource allocation was consistently lacking or weak and were submitted late. There was insufficient consultation with stakeholders as shown in the lack of awareness on procedures in settling grievances in Dura, for example. Dispute resolution committees were never established.



Implementing Agency Performance Rating

Unsatisfactory

Overall Borrower Performance Rating

Unsatisfactory

10. M&E Design, Implementation, & Utilization

a. M&E Design

According to the Project Appraisal Document (PAD), project monitoring and evaluation responsibilities are delegated to the Project Management Unit through its Project Director, supported by the parallel-financed technical assistance team (PAD, paragraph 39). The Project Director will oversee data aggregation and periodic reporting on progress and ensure that the key performance indicators and project development objective are met. Meanwhile the Project Management Team, supported by the Technical Assistance Team, will maintain a simple project M&E arrangement including auxiliary data storage tools, output dashboards, outcome monitoring, reporting and evaluation of performance, and the application of gender-sensitive monitoring on disaggregated data, where relevant. The project objective was clear and the indicators selected were measurable in terms of numbers, timing and location, having captured lessons from the previous Land Administration Project. However, the design called for the parallel-funded technical assistance to come up with the M&E framework that would be used in the project which included data collection for constructing baselines. Eventually the M&E framework generated by the technical assistance would be transferred to the project management unit.

The 2014 Mid Term Review noted that the PMU would update the Project Results Framework and manage the social satisfaction/impact and customer satisfaction survey studies (MTR, paragraph 19). The M&E framework was delivered on September 2015 by consultants hired under the parallel funded technical assistance which laid out the data storage issues and definition of roles and responsibilities under an institutionalized M&E system. The M&E strategy was deficient since the choice of indicators presented were not adequate to measure the results chain. The baseline data was established late. Planned evaluations included ex-post evaluation of project efficiency.

b. M&E Implementation

There were significant shortcomings in M&E implementation. There was a lack of adequate M&E arrangement and reporting based on the Results Framework. The parallel-financed technical assistance was supposed to have provided inputs toward establishing an M&E framework but this framework was delivered only by September 2015. Significant flaws in the planned baseline data collection (for example, customer satisfaction) was not corrected at the time of the November 2014 Mid Term Review. The quality of progress reporting and the reporting on project outcomes and key performance indicators were weak (ICR, paragraph 34) due to the modest inputs from the parallel-funded Technical Assistance Team and a lack of dedicated staff throughout project implementation. Reporting on the results framework was below optimal throughout



the project life (MTR, paragraph 19 and ICR, Annex 2, last paragraph). The weak performance of the technical assistance in the M&E area, the heavy work load of the Project Director, PLA departments unfamiliar with results-based monitoring, and a lack of ownership of the M&E system all contributed to the poor M&E implementation.

c. M&E Utilization

There were severe shortcomings in M&E utilization. No timely data were used to improve performance and results on the ground. The flow of information from the field to the Palestinian Land Authority was sporadic and inconsistent (ICR, paragraph 34). There was vague reporting on achievements that confused targets and actuals; and a general tendency to neglect reporting on the unit of measure across the Results Framework. The project's M&E activities did not affect the strategic reframing of the project. Changes to the Results Framework were made without prior consultation of the Financing Partners. M&E was not utilized in decision-making and was viewed as an imposition of the Financing Partners. An independent review of the project was not conducted at project closing.

M&E Quality Rating

Negligible

11. Other Issues

a. Safeguards

Environmental Assessment: The project is a Category C which means that it was likely to have minimal or no adverse environmental or social impacts (PAD, paragraph 68 and ICR, paragraph 35).

b. Fiduciary Compliance

Procurement implementation was marked by inadequate planning, weak institutional capacity, internal bureaucracy, and implementing agency inefficiencies (ICR, paragraph 38). Procurement packages were not processed in a timely manner. The Palestinian Land Authority did not adequately perform their obligations with regard to assessing capacity of local surveying firms, or in raising awareness of contract provisions such as scope and performance specifications. Bid documents to outsource the land registration of 90,000 dunums under one contract were prepared, with help from the Bank (ICR, paragraph 36) but no bids were received in the end. No explanations were provided to Financing Partners (ICR, paragraph 67).

Financial Management: The team conducted quarterly financial management supervision missions and trained project staff in disbursements and financial management to mitigate the limited capacity of the implementing entity to meet Bank reporting procedures. External audits were undertaken (ICR, paragraph 66). Financial management was deemed adequate (ICR, paragraph 37), audits were submitted in a timely fashion,



and the auditor expressed unmodified clean audit opinion.

c. Unintended impacts (Positive or Negative)

d. Other

Gender and Vulnerable Groups: The project targeted vulnerable groups, particularly women, in the systematic land registration activities and in raising awareness about property rights. A Social Facilitation Team provided legal assistance and raised awareness in the project area and the communities directed at vulnerable groups which included women, elderly, illiterate individuals, orphans, absentee owners, prisoners, unemployed and very poor people, and small clans (ICR, footnote 10).

There were no beneficiary surveys conducted. A customer satisfaction survey was reported to have been carried out in July 2014 but was not made available to the Bank (ICR, Annex 5). This project was cancelled and no specific transition arrangements have been made for post-cancellation of investments financed by the project (ICR, paragraph 39). A Stakeholder Workshop to seek feedback on the ICR and draw lessons from project operations concluded that the targets were ambitious and replicating the systematic land registration in other areas would be problematic. In addition, respondents pointed out the negative impact from high staff turnover in providing technical assistance, and the lack of cooperation among the departments of the implementing entity and financing partners. Respondents, however, pointed out the positive role that municipalities could have played in project implementation.

12. Ratings

Ratings	ICR	IEG	Reason for Disagreements/Comment
Outcome	Highly Unsatisfactory	Highly Unsatisfactory	---
Risk to Development Outcome	High	High	---
Bank Performance	Moderately Unsatisfactory	Moderately Unsatisfactory	---
Borrower Performance	Unsatisfactory	Unsatisfactory	---
Quality of ICR		Substantial	---

Note

When insufficient information is provided by the Bank for IEG to arrive at a clear rating, IEG will downgrade the relevant ratings as warranted beginning July 1, 2006.

The "Reason for Disagreement/Comments" column could cross-reference other sections of the ICR Review, as appropriate.



13. Lessons

The ICR presents the following lessons (slightly edited) based on the operation (ICR, paragraphs 75-86):

- Formally restructuring a project remains an option when reaching the original development goals cannot be reasonably expected. However, political commitment and government ownership cannot be overemphasized. Having clear mandates, regulations, and processes in place to strengthen the institutional framework firms up project design. When starting at a low capacity, analyses help inform target setting, and identify risk-mitigating efforts to sustain outcomes.
- Partnering with municipalities is a useful strategy to implement a nationwide systematic land registration effort. This could include piloting municipality-specific, on-demand registration, coupled with waiving initial registration fees to create a critical mass of registered properties. At the same time, fostering an enabling environment to boost the capacity of the private sector to partner with municipalities in delivering land administration services could facilitate project implementation.
- A strategy of wide stakeholder community participation can help improve project efficiency and governance. This strategy may also be useful when using non-judicial land dispute resolution measures to expedite systematic land registration.

14. Assessment Recommended?

No

15. Comments on Quality of ICR

The ICR is brief, results oriented, and internally consistent following OPCS guidelines. The ICR candidly discusses the challenges faced during implementation and in particular, the lack of coordination among technical assistance providers in preparing the framework for the monitoring and evaluation system that would form the backbone of project operations. In addition, the lack of cooperation from the implementing agency itself was discussed in depth as a major stumbling block to meeting the project's development objectives. Both the quality of evidence and analysis adequately support lessons drawn from project implementation and the decision to cancel the needed investment in land administration. The only drawback appeared in the meager discussion of the impact of the parallel technical assistance grant from the Government of Finland.

a. Quality of ICR Rating

Substantial