



1. Project Data

Project ID P154387	Project Name Program for Improved Land Governance		
Country Viet Nam	Practice Area(Lead) Urban, Resilience and Land		
L/C/TF Number(s) IDA-58870	Closing Date (Original) 31-Dec-2021	Total Project Cost (USD) 48,722,833.48	
Bank Approval Date 05-Jul-2016	Closing Date (Actual) 30-Jun-2023		
	IBRD/IDA (USD)	Grants (USD)	
Original Commitment	150,000,000.00	0.00	
Revised Commitment	60,410,319.42	0.00	
Actual	48,722,833.48	0.00	
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2. Project Objectives and Components

a. Objectives

The Project Development Objective (PDO) as stated in the Financing Agreement (Schedule 1, page 5) and the Project Appraisal Document (PAD, page 6):

" To improve the efficiency and transparency of land administration services in the Project Provinces, through the development and implementation of the national Multipurpose Land Information System (MPLIS)."



For the purpose of this Implementation Completion Report Review (ICRR), the PDOs are taken to be:

PDO 1. To improve the efficiency of land administration services in the Project Provinces: and

PDO 2. To improve the transparency of land administration services in the Project Provinces.

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

Yes

Did the Board approve the revised objectives/key associated outcome targets?

Yes

Date of Board Approval

30-May-2023

c. Will a split evaluation be undertaken?

No

d. Components

There were three components. (The figures for the appraisal estimate and the actual cost are from ICR page 13- 14).

1. Strengthening Quality of Land Service Delivery. The estimated cost at appraisal was US\$6.84 million. The actual cost was US\$1.52 million. This component planned to finance a program to support the quality of land services at the national and sub-national levels. There were three sub-components:

1a. Modernization and Strengthening of Land Registration Offices (LROs). Activities in this sub-component: (i) simplifying and streamlining business processes and operating guidelines for LROs, developing a service delivery manual with standardized procedures for establishing LRO structures: (ii) equipment for district and provincial LROs; and (iii) technical assistance (TA) and training LROs to adopt new procedures for establishing standard LRO structures.

1b. Trainings and Support for Public Awareness Raising and communication. Activities in this sub-component: (i) conducting public awareness and communication programs for government officials and land users; and (ii) training ethnic minorities for implementing ethnic minority development plans; and

1c. Monitoring and Evaluation (M&E) for Land Use Management. TA to pilot a M&E system for implementing the land law.

Activities pertaining to trainings, public-awareness raising and communication and establishing a M&E system, were dropped following new government regulations after project approval that non-investment activities were ineligible by official development assistance (discussed below in section 2e). These activities however were implemented using government funds.



2. Establishment and Development of the MPLIS and Land Database. The estimated cost at appraisal was US\$160.39 million. The actual cost was US\$73.39 million. There were three subcomponents:

2a. Development and Implementation of a MPLIS . Activities in this subcomponent: (i) support for MPLIS design, TA and equipment; (ii) training staff, software development, procuring digital infrastructure, migration of existing land electronic system/databases into MPLIS, module development to integrate the four key land layers (land inventory, cadastral, land value and use plans); and (iii) establishing virtual data centers.

The Government did not follow the the Bank's procurement guidelines and awarded the contract to provide the MPLIS software and Information Technology (IT) system to a state-owned enterprise (Viettel). Hence, activities such as establishment of the MPLIS/IT system were removed from the financing agreement and implemented with government funds.

2b. Development and Implementation of a national land database (in 33 provinces). Activities in this subcomponent: (i) compiling, verifying and digitizing maps and land records into a national data base for base data for MPLIS; and (ii) integrating available land data using MPLIS.

2c. Strengthening Multi-Stakeholder Participation and Public Engagement through developing a land portal with different interfaces to enable government agencies and the public access to land information.

3. Project Management and M&E. The estimated cost at appraisal was US\$12.77 million. The actual cost was US\$8.10 million. There were two subcomponents: (i) project management support; and (ii) support for establishing a M&E system.

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

Project cost. The estimated cost at appraisal was US\$180.00 million. The actual cost was US\$60.90 million.

Financing. The project was financed by an International Development Association (IDA) credit of US\$150.00 million. US\$90.00 million of the credit was cancelled for the following reasons: (i) government self-financed certain components following delays in effectiveness; (ii) a regulatory change under which the Government prohibited IDA funds for TA activities; and (iii) five of the 33 project provinces chose not to participate in the project and planned to use other funding sources. The amount disbursed was US\$48.72 million.

Borrower contribution. Borrower contribution of US\$30.00 was planned at appraisal. The ICR (para 42) noted that there was a borrower contribution. However, the exact contribution of the central government and provincial governments were not tracked.

Dates. The project was approved on July 5, 2016, became effective on March 23, 2017, and was to close on December 31, 2021. The Mid-Term Review (MTR) was held on December 6, 2019. The project closed 18 months behind schedule on June 30, 2023.

Other changes. The project was restructured thrice during implementation.



The main changes made through **the first project restructuring on December 31, 2021:**

- The closing date was extended by 18 months from December 31, 2021 to June 30, 2023 due to the delays in the initial years.
- US\$49.15 million of Bank loan was cancelled at government request, as the Ministry of Natural Resources and Environment (MONRE) decided to finance MPLIS through government sources.
- The number of project provinces was reduced from 33 to 30.

The main changes made **through the second project restructuring on May 30, 2023;**

- US\$40.61 million of the loan was cancelled due to the unspent funds for the national land database contract and two more provinces were able to use other sources of funding.
- The institutional arrangements were changed, with MONRE's Department of Registration and Land Information Database tasked with the responsibility for implementing the project.
- The results framework was revised to reflect the revised project scope and the indicator baselines and targets were revised. (The PAD noted that outcome targets were to be established through a baseline survey). The baseline survey was delayed until mid 2020 and the baseline and targets were formalized.
- The targets for some intermediate indicators were increased.

The main change made **through the third project restructuring on June 21, 2023:**

- The financing agreement was amended to ensure that the project description focused only on project-financed activities.

Split rating. This review is not based on a split rating of objectives for these reasons: The development objectives, key outcomes and the project's scope and scale did not change. Although Bank financing for the project reduced significantly during implementation, the planned activities were completed with government funding. The project's scope and scale remained substantially unchanged and minor revisions were made to improve measurability

3. Relevance of Objectives

Rationale

Country context. Modernizing delivery of land services was a key priority for Viet Nam. Better land administration was expected to help in reducing land-related transaction costs and disputes in the medium term and improved tenure security was expected to facilitate in the long-term better outcomes of developing efficient land and mortgage markets, enabling land-based investments and increasing land productivity.

Sector context: The main bottlenecks in delivery of land services were: (i) inconsistencies in implementing the land law by different provinces. Lack of an unified land administration system complicated the efforts of the General Department of Land Administration (GDLA) and the MoNRE to support provincial Departments of Natural Resources (DoNREs) and LROs: (ii) Some provinces still depended on paper records: (iii) Differences in land information systems led to variations in performances of LROs across provinces. The



central government was unable to monitor so many different systems and faced difficulties in sharing land data with other national databases: (iv) Core land information such as land use plans, land values and land inventory data were not digitized and not integrated with the land registrations systems, which contributed to the difficulties in implementing the eGovernment strategy; and (v) There was a need for further investments hardware and software, as well as standardization and integration to allow Viet Nam to provide effective land administration services and manage national land-based resources.

Government strategy. The Socio-Economic Development Plan (SEDP) for 2016-2020 broadly emphasized the need for government-wide reforms for macroeconomic stability, and specifically highlighted the importance of managing land effectively. The Government adopted a revised land law in 2013 for enhancing land users' rights. Under its overall Land Management Strategy, the Government aimed to improve public awareness, increase land registration, improve land use planning and land valuation mechanisms, monitor the Land Law of 2013 and develop a national land information system. In support of the Prime Minister's Decision dated May 22, 2015, on developing priority databases, the MoNRE and the General Department of Land Administration (GDLA) issued a road map entitled: *Comprehensive Program for the Development of Viet Nam's Multi- Purpose Land Information System*. The roadmap recommended developing MPLIS and a National Land Database and capacity building for better land administration and management.

The PDO was well-aligned with the government's development priorities of the SEDP for 2021-2030. The plan also identified development of e-governance as a priority.

World Bank (WB) strategy: The PDO was consistent with the Country Partnership Strategy (CPS for 2012 - 2016) at appraisal. The CPS was aligned with two key outcomes: Outcome 1.1 emphasized the need for improving economic management and business environment and outcome 1.2 highlighted the need for improving natural resource management. The cross-cutting themes of the CPS identified the need for strengthening governance and enhancing community participation through increasing access to land information and land administration services.

The PDO was in consonance with the Country Partnership Framework (CPF) for 2018 - 2022. The focus area three of the CPF on strengthening natural resource management, identified the critical role land plays in this context and highlighted the need for transparency in land transactions and efficient land markets. The CPF specifically underscored the need for modernizing land administration at the sub national level and increasing land productivity. The Bank's Country Partnership Strategy (CPS) for 2023 -2027 is still to be finalized,

WB experience. The Bank had previously financed the Viet Nam - Land Administration Project aimed at improving land information services in seven provinces. It has also financed several analytical and TA work tasks (such as for drafting the 2013 draft law, the Land Transparency Study (2013 - 2014), the National Spatial Development Infrastructure (NSDI) Strategic Framework (2012-2013) and studies on land valuation, land conversion and land acquisition. These studies addressed the need for improving the efficiency and transparency of land management.

Unlike the previous Bank-financed project which focused on a few selected provinces, this project aimed to expand the reforms into a more comprehensive program with a national scope to effectively manage and coordinate land administration and the associated land governance framework. The overall reach of project activities which included in addition to establishing a MPLIS, included the institutional strengthening of the



government agencies, in accordance with the current Government strategy and the Bank strategy for Viet Nam. The relevance of the PDO is High.

Rating

High

4. Achievement of Objectives (Efficacy)

OBJECTIVE 1

Objective

PDO 1. To improve the efficiency of land administration services in the Project Provinces.

Rationale

Theory of change. The causal links between project activities (inputs), outputs and intended outcomes were logical and outcomes were monitorable. Activities were aimed at modernizing LROs (through streamlining business processes, providing office equipment and support for capacity building of staff). In addition, conducting public awareness training and a communications program for government officials and land owners, as well as TA for establishing M&E for land management, were likely to aid in creating a unified LRO structure and enhancing staff capacity. These outputs were considered as likely to help in improving the efficiency of land administration services. These outcomes were expected to aid in the long-term objectives of developing land and mortgage markets, improving tenure security and reducing land conflicts.

The outcomes were predicated on two assumptions: (i) The provinces had the financial capacity to accept on-lending from the central government; and (ii) The existing land records were largely accurate and did not require additional mapping and data collection.

Outputs.

- A land service delivery manual with streamlined procedures and guidelines was developed. A unified provincial-level structure was established and LRO officers were trained.
- The digitized land records were incorporated in the National Land Database and hosted on the MPLIS.
- The LRO manual was shared with all the 63 provinces of Viet Nam to encourage nationwide adoption of streamlined procedures.
- 96% of the LROs and branches complied with the agreed procedures and standards, exceeding the target of 90%.
- 61 provinces established a centralized provincial LRO with uniform structures, exceeding the target of 28.
- The managers and officers of LROs, branches and cadastral officers of Commune People's Committees were trained on land administration service delivery in a digitized environment, exceeding the target of 90%.



- 20 ethnic minority development plans (EMDPs) were implemented in project areas as targeted.

Outcomes.

The activities described above were expected to contribute to the outcome of reducing the time required for completing a land transaction.

- The average time for a land transfer reduced from 35 days at the baseline to 8.5 days, exceeding the target of 10 days. The ICR (para 31) acknowledges, however, that only one day's time savings could be wholly attributed to the project. Following the project start-up delays, most activities were only beginning when the 2020 baseline report revealed that land transaction time had, in the interim, decreased to 9.6 days. Some digitization activities had started in 2019 using existing software and the decrease in time from the baseline was due to the activities by both the government and the local authorities in administrative procedure reform, digital transformation and improving land service delivery. Hence, even though the project contributed to a reduction in the initial years, it cannot be wholly attributed to the project.
- A survey conducted when the project closed indicated that: (i) 79% of land users were satisfied with the land registry, exceeding the original and revised targets of 65% and 70%, respectively. and (ii) 82.7% of government and public institutions (the Department of Taxation, the notaries, and the judiciary) were satisfied with the land registry, exceeding the original and revised targets of 70% and 75%, respectively.

Efficacy of this PDO is rated as substantial with moderate shortcomings. Even though the project contributed towards improving the efficiency of the land administration, the results could not be wholly attributed to project activities.

Rating

Substantial

OBJECTIVE 2

Objective

PDO 2. To improve the transparency of land administration services in the Project Provinces.

Rationale

Theory of change. The causal links between project activities (inputs), outputs and outcomes were logical and the outcomes monitorable. Activities aimed at developing the National Land data base (through digitizing maps and land records), integrating available land data (including cadastral, land price, land use plans and land inventory), as well as operationalizing the MPLIS and training staff on using the system, were intended to contribute to unified digitized land records. Such outputs were likely to help in improving the transparency of land administration. The outcomes were predicated on the assumption that the regulatory environment was conducive for sharing land data with various stakeholders.

Outputs.



- The digitalized land records and unified land data base were developed with multiple data layers as indicated above. The interim MPLIS was developed and became operational. The interim MPLIS and Land database were connected and were exchanging information with other systems when the project closed. The ICR noted that IDA funds did not fund the MPLIS infrastructure, although IDA funds financed the design of MPLIS. 11,006 LRO officers were trained. Targets were not specified for these indicators.
- 35 provinces were connected to the MPLIS, exceeding the target of 28.
- All the LROs and branches installed and implemented the MPLIS, substantially exceeding the target of 90%. 95% of land parcels were geo-referenced and registered, exceeding the target of 70%. All the LROs and branches were connected with other sectors and data could be accessed by user entities, exceeding the target of 90%. All the LROs provided land information through their websites, exceeding the target of 90%.
- All the end users (LROs, branches, communes and central departments) were trained on MPLIS, exceeding the target of 90%.
- All the provinces with an established connection exchanged data between LROs, branches and other public service providers, exceeding the target of 90%.

Outcomes.

The outputs described above was expected to improve the transparency of land administration services in project provinces (monitored through the number of hits to the MPLIS).

- There were a total of 2,434,557 hits to the MPLIS, exceeding the specified target of 2,000,000.
- The number of hits by end-users increased to 1,782,345, substantially exceeding the target of 1,000,000.
- However, although there were 652,232 hits by the Government and public institutions (the department of taxation, notaries, judiciary and others), this was short of the target of 1,000,000. The ICR (para 37) notes that the lack of an enabling regulatory framework to share land data with other agencies constrained MPLIS's ability to meet the targets for government officials.

Efficacy of this PDO is rated as substantial, as the targets were realized for the most part.

Rating

Substantial

OVERALL EFFICACY

Rationale

The project substantially achieved both the objectives. However, given the attribution concerns in achieving the objectives especially related to the improving efficiency of land administration services, the overall efficacy is rated as substantial with moderate shortcomings.



Overall Efficacy Rating

Substantial

5. Efficiency

Economic analysis. The economic benefits of the project were assumed to come from: (i) increases in tax revenue; (ii) cost savings on land transactions; and (iii) revenue from data on land information. A financial analysis conducted at appraisal estimated the financial internal rate of return (FIRR) of 21% at 10% discount rate. The ICR (para 44) noted that an evaluation was conducted at closure based on surveys from seven provinces conducted through direct investigations and 21 provinces indirectly through survey forms. The results demonstrated that the project did not have a direct impact on raising revenue from taxes and fees. The evaluation noted that any change in taxes or fees were mainly dependent on fluctuations in land transactions, which were mainly due to the volatility or stagnation of the real estate market. The ICR noted that a longer exposure or comparison with other provinces that were not connected to MPLIS could have strengthened the necessary counterfactual to attribute changes in transactions and revenues.

The ICR (para 46) noted that a more detailed economic analysis could not be conducted at project closure, due to the lack of detailed data on land transactions, as well as estimates of national and provincial government funding of project activities outside the financing agreement.

Administrative and operational issues during implementation. Although the project was declared effective on March 23, 2017, implementation was delayed by nearly two years, due to multiple regulatory and fiscal issues such as: (i) a change in government regulation that no longer allowed IDA funding for non-investment activities; (ii) delays in government procedures for including the project in the Mid-Term Investment Plan (MTIP). The delay impacted project provinces as they could not signing on-lending arrangements until the project was included in the MTIP with an allocated budget; (iii) The government further delayed the final decision on the appropriate software system for the national IT system for the MPLIS; (iv) There was insufficient understanding at design of provincial financing requirements, so that the provincial entities could obtain Bank funds from the national government; and there were procurement delays. Because of these delays, only US\$1.00 million (0.03%) of the IDA credit had been disbursed at the time of the MTR on December 6, 2019. The delays in the initial years, exacerbated by external factors over which the project had no control (restrictions in the wake of the COVID-19 pandemic) contributed to time overruns, with the project closing a year and half behind schedule.

The project did not demonstrate good value for the Bank financing of the project. Following the implementation delays in the initial years, a total of US\$90.00 million of the Bank loan (representing 60% of the original IDA credit of US\$150.00 million) was cancelled through the project restructurings. Only US\$43.20 million (28.8% of the Bank loan) was utilized for project activities). The ICR noted that the IDA credit savings were due to i) the GoV allocating more of their own funds for the activities deemed ineligible for IDA financing under the GoV regulation adopted after project approval; ii) land records that were unable to be digitized or included in the system due to errors and thus the number of records was reduced; and iii) cost savings from engaging the private sector in the data digitization processes through competitive procurement.



Overall efficiency is rated as modest. Although the project did achieve the outputs and target outcomes at lower amount of IDA spending, this was also due to the activities financed by the Government and attributable benefits were not realized to the extent expected.

Efficiency Rating

Modest

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	✓	21.00	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 the PDO to the Government strategy and the Bank strategy is rated as High. Overall efficacy is substantial with moderate shortcomings due to attribution concerns Efficiency is modest. Taking these ratings into account, the outcome is rated as moderately satisfactory.

a. Outcome Rating

Moderately Satisfactory

7. Risk to Development Outcome

Government commitment/ownership. The risk to development outcome from a lack of government commitment is low. The notion that modernizing the land administration system continues to remain a priority to the country was demonstrated by the government financing many of the project activities that were originally envisioned to be financed by the IDA credit.

Institutional risk. There is significant risk to the development outcome, as there is no long-term agreement between MONRE and the software/system provider of MPLIS. The ICR (para 84) notes that this risk is high, given that the official commitment of Viettel to support project provinces ended at project closing. The ICR observed that MONRE was planning to build a unified centralized MPLIS system with government funding to be completed in 2025, and had instructed the provinces to continue using the interim MPLIS in the form of "rental" arrangements, and the Project provinces were planning for budget resources to maintain the MPLIS and land databases under the guidance of MONRE. However, the process to procure a new system faces



complex public investment procedures and any new software will take time to design, to procure, develop, integrate land data and build related capacity to operate.

The ICR noted that when the project closed, 35 provinces were integrated with the national land database. However, almost half of Viet Nam's provinces were not yet included and were expected to join using provincial resources. With some non-project provinces working via paper records, TA and capacity building are required to ensure that there is clear understanding of how to digitally process income land transactions and maintain the system with accurate records.

8. Assessment of Bank Performance

a. Quality-at-Entry

The Bank prepared the project based on the experience from the Viet Nam Land Administration Project and lessons from previous Bank-financed regional land administration projects (such as in Thailand, Indonesia, Cambodia and Lagos). Lessons incorporated included: (i) emphasizing the need for management capacity at all levels of government; (ii) recognizing that land administration activities require long-term interventions that need support through successive projects, as land projects involving many elements are inherently complex; (iii) focusing on incremental changes and limited priority areas such as improving efficiency and transparency in land administration systems and capacity building for sustaining reforms. The analytical underpinnings of project activities were sound (discussed in section three). The preparation team selected the project projects based on financial needs. This method of selection was appropriate as others could self-finance, as demonstrated by the non-project provinces connecting to MPLIS using their own resources.

The implementation arrangements made at appraisal, proved to be adequate during implementation. These included; At the national level, the MoNRE in charge of coordination; The GDLA, within MoNRE, in charge of project management. A Central Project Management Unit (CPMU) and Provincial Project Management Units (PPMUs) in charge of day-to-day project management at the central and provincial levels respectively.

The Bank identified several risks at appraisal including, risks with sector policy (although the Government had enacted a policy framework, there were significant gaps between this framework and implementation), weak implementation capacity especially at the sub national level and fiduciary risks. The Bank incorporated several mitigation measures. Even with mitigation measures, the project risk was rated as substantial at appraisal (PAD, para 41). The arrangements made at appraisal for safeguards and fiduciary compliance were appropriate (discussed in section 10).

There were significant shortcomings at Quality-at-Entry. One, it was not clear if there was an adequate assessment of the existing land data and software. The lack of implementation readiness contributed to delays in the initial years: Two, the assumptions made at appraisal about how long it would take for the project to commence activities (especially the land database contracts) was far too optimistic; and (iii) there were significant drawbacks in M&E design. The baselines were only finalised in May 2023 i.e. less than two months before the project closing (discussed in section 10).



Quality-at-Entry Rating

Moderately Unsatisfactory

b. Quality of supervision

Fifteen Implementation Status and Results (ISR) Reports were filed over a project implementation period of roughly eight years (implying twice a year missions on average as per the norm). The Bank remained responsible and flexible following the new government policy forbidding IDA financing of non-investment activities. The World Bank mobilized bank-executed trust funds to complete the LRO sustainability review and to make recommendations around the land policy and land reforms. Rather than cancelling the project or reducing its scope due to the delays in the initial years, the Bank gave the project more time to develop alternative strategies and demonstrate results. This approach was appropriate, as the project activities were completed by project closure. The Bank addressed some of the shortcomings at M&E design through the project restructurings. Financial management and procurement were both rated as moderately satisfactory.

There were moderate shortcomings: (i) The Bank could have provided further support to provincial level procurements; (ii) The Bank could have provided more assistance to ensure consistency in M&E reporting; and (iii) The formal restructurings to incorporate the flexible approaching were delayed and ought to have been conducted much earlier than one month before project closing.

Bank performance during supervision was rated as moderately satisfactory.

Overall Bank performance is rated as moderately satisfactory. As per the guidelines, when Bank performance at Quality-at-Entry is moderately unsatisfactory and Bank performance during supervision is moderately satisfactory, overall Bank performance is aligned with the outcome rating.

Quality of Supervision Rating

Moderately Satisfactory

Overall Bank Performance Rating

Moderately Satisfactory

9. M&E Design, Implementation, & Utilization

a. M&E Design

The design of project monitoring and evaluation was based on the Aligned Monitoring Tool developed by the Ministry of Planning and Investment (MPI) in collaboration with key donors.

Although the results framework was clear, there were significant shortcomings in M&E design. The outcome targets were to be established through a baseline survey planned for 2017. However, the baseline



survey was delayed due to project implementation and financing delays until mid 2020. The baseline and targets were only formalized through a project restructuring in May 2023.

Although the PDO indicators were well-aligned with the project objective, key targets were missing. There were inaccuracies in the baselines and the intermediate indicators were inadequate. The plan for monitoring did not define realistic measures for collecting data for monitoring project performance. Mitigation measures were inadequate, as they depended on TA which could not be supported following changes in Viet Nam's regulatory environment around use of IDA funds for TA (ICR, para 40).

b. M&E Implementation

Some of the deficiencies in M&E design such as additional intermediate indicators) were addressed through the project restructurings.

However, there remained shortcomings in M&E implementation for factors such as: (i) Lack of M&E staff at the Provincial Project Management Units (PPMU). Hence, the Central Project Management Unit (CPMU) had to spent time to obtain data; (ii) Although there was a M&E system, inconsistent use of the system by the provinces, contributed to irregular reporting; (iii) The project reports had multiple errors and inconsistencies with changes in reporting past data and listing targets that were unchanged (and were not the targets eventually established at restructuring); (iv) The government completion report contained errors and inconsistencies in reporting key PDO indicators and the report did not provide details on the sampling or survey design. The ICR noted that despite these errors, the government report was sufficient for measuring project progress after the Government provided further clarification and corrections to the reports.

c. M&E Utilization

The M&E system enabled the CPMU and provinces to check progress. The ICR (para 71) acknowledges that eventually the project largely depended on the project baseline and endline evaluation for reporting progress due to issues with the quality of data.

In sum, overall M&E is rated as modest due to the shortcomings in M&E design and implementation.

M&E Quality Rating

Modest

10. Other Issues

a. Safeguards

The project was classified as a Category B (partial assessment) project under the WB safeguard policies. Two safeguard policies were triggered at appraisal: Environmental Assessment (OP/BP 4.01); and Indigenous Peoples (OP/BP 4.10).



Environmental Assessment. A Social Assessment (SA) was conducted at appraisal. This safeguards was triggered due to the potential downstream environmental and social impacts of project activities (specifically activities on strengthening M&E in land use management) (PAD, para 45). Given the nature of the project, it was envisaged that the potential impacts would be mainstreamed in project activities during implementation (PAD, para 47).

Environmental safeguards performance was consistently rated as satisfactory during implementation, and there were no outstanding environmental safeguards issues when the project closed (ICR, para 75).

Indigenous Peoples. This safeguards was triggered, as twenty three of the 33 proposed project provinces had ethnic minorities. An Ethnic Minorities Plan Framework (EMPF) was prepared and publicly-disclosed at appraisal. Four provinces had developed Ethnic Minorities Development Plans (EMDPs) at appraisal. Similar EMDPs were to be prepared for other provinces during implementation (PAD, para 52).

There were no grievances from indigenous peoples during implementation. The project's social safeguard performance was satisfactory (ICR, para 76).

b. Fiduciary Compliance

Financial Management (FM). The Bank conducted a FM assessment of the GDLA and the project provinces. The assessment concluded that the Project met the Bank's FM requirements. However, even with mitigation measures, the FM risk was rated as substantial at appraisal (PAD, para 49).

The ICR (para 77) noted that FM was consistently rated as 'moderately satisfactory' during implementation. Although unqualified annual audited reports and interim financial reports were submitted with acceptable quality, they were often delayed.

Procurement Management. The Bank conducted a procurement assessment of the implementing agencies at appraisal. The assessment identified the major risks that could cause procurement delays. With mitigation measures, procurement risk was rated as substantial (PAD, para 56).

The ICR (para 76) noted that the overall procurement performance was moderately satisfactory through the project life. Given the large number of procurement activities being implemented in a decentralized manner by nearly 30 different implementing agencies, the procurement quality was uneven across provinces.

c. Unintended impacts (Positive or Negative)

There were no unintended impacts.

d. Other



Not applicable.

11. Ratings

Ratings	ICR	IEG	Reason for Disagreements/Comment
Outcome	Moderately Satisfactory	Moderately Satisfactory	
Bank Performance	Moderately Satisfactory	Moderately Satisfactory	
Quality of M&E	Modest	Modest	
Quality of ICR	---	Substantial	

12. Lessons

The ICR draws the following main lessons from the experience of implementing this project, with some adaptation of language.

1. Land administration is not the sole factor driving land markets. Although accurate, integrated and unified land information can assist land administration officials in processing requests and resolving land disputes, the lesson from this project is that improved land administration is not the sole factor driving land markets and that increases in land transactions and related land markets are dependent on multiple factors, including trends in the economy and the real estate market.

2. A longer term evaluation covering both project and non-project areas, may help in measuring the efficiency aspects of land administration projects. In this project, the MPLIS only became functional in 2022. This made it difficult to measure the efficiency aspects of the project.

3. A careful assessment of the sub-national entities may raise the potential for success in projects. In decentralized structures, with different capacities, finances, strengths and weaknesses, different modes of engagement may be required. The lesson from this project is that different technical assistance and lending arrangements may be required in projects entailing sub-national entities, taking into account their experience and capacity.

13. Assessment Recommended?

No

14. Comments on Quality of ICR



The ICR is clear and well-written. The theory of change expounded in the text clearly articulates the clear logical links between project activities (inputs), outputs and the desired outcomes. The ICR also explicitly states the assumptions underlying the theory of change. The evidence provided in the text is adequate for assessing project performance. The ICR draws reasonably good lessons from the experience of implementing this project.

However, there are minor shortcomings. The figures on actual project costs in the body of the text (ICR, page 9) is not consistent with the figures of costs provided in ICR Annex 3. The main body of the text at about 30 pages is almost twice the recommended length of 15 pages.

a. Quality of ICR Rating
Substantial