

IEG

ICR Review
Independent Evaluation Group

1. Project Data:		Date Posted : 12/12/2013	
Country:	Bosnia and Herzegovina		
Project ID:	P100415	Appraisal	Actual
Project Name:	Avian Influenza Preparedness Project	Project Costs (US\$M):	6.4
L/C Number:	C4331	Loan/Credit (US\$M):	5.0
Sector Board:	Agriculture and Rural Development	Cofinancing (US\$M):	0.66
Cofinanciers:		Board Approval Date:	
		Closing Date:	12/31/2010
Sector(s):	General public administration sector (53%); Health (23%); Agricultural extension and research (21%); Animal production (2%); Other social services (1%)		
Theme(s):	Other communicable diseases (25% - P); Natural disaster management (25% - P); Rural services and infrastructure (24% - P); Pollution management and environmental health (13% - S); Health system performance (13% - S)		
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2. Project Objectives and Components:

a. Objectives:

The objective of the project was to "*minimize the threat posed to humans and the poultry industry by Highly Pathogenic Avian Influenza infection and other zoonoses*" (Financing Agreement, page 5).

The objective in the Technical Annex is substantially identical (page 14).

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

No

c. Components:

Original components (and their restructuring):

1. Strategic communication and public information (US\$0.20m at appraisal, \$0.07m final) including support for development of communication materials to inform the public about steps to reduce the risk of disease transmission, training in communication methodology and media strategy for spokespeople, and coordination of stakeholder outreach and collaboration.

2. Animal health protection and disease prevention and control (US\$2.98m at appraisal, \$3.06m final) supporting improvement of the policy and regulatory framework to meet World Organization for Animal Health standards, veterinary service capacity upgrades through laboratory upgrades to Biosecurity Level 2 (BSL 2), establishing an animal disease surveillance system, providing training and protective equipment for outbreak containment, and providing training on biosecurity practices for smallholder farmers. After restructuring, the design changed to support more extensive support a single National Reference Laboratory and some support for two regional BSL 2 laboratories, rather than more modest support for 5-7 regional laboratories. It also added support for an electronic (rather than paper) animal disease surveillance data system.

3. Human health protection and disease prevention and control (US\$1.98m at appraisal, 1.45 final) supporting improvements public health planning and coordination (including contingency planning for epidemics and pandemics), establishing an influenza surveillance system, increasing diagnostic capacity by upgrading diagnostic laboratories to BSL 2 and providing equipment and training, and strengthening health care response capacity by establishing isolation wards and supporting vaccination capacity and purchasing a stockpile of antivirus. Though there was no formal restructuring, in response to the 2009 influenza pandemic funds were shifted from support for intensive care unit to purchase of drugs, but these funds were not used as the pandemic was less severe than feared. After the formal restructuring in July 2010, support for intensive care units was restored and support was added for purchase of respirators, doses of seasonal influenza vaccine, and additional personal protective equipment.

4. Poultry culling compensation scheme (US\$0.75 million at appraisal, \$0 final) supporting establishment of a fund to compensate farmers for poultry culled in outbreak control operations. After restructuring, the component was dropped.

5. Implementation support and Monitoring and Evaluation (US\$0.45m at appraisal, \$US0.48 final) supporting the project management unit and monitoring and evaluation implementation.

The project was restructured in June 2010. This restructuring dropped funding for compensation, since there had been no outbreaks, and increased spending on other activities, particularly on the animal health laboratory in Sarajevo.

d. Comments on Project Cost, Financing, Borrower Contribution, and Dates:

As the project used an emergency lending instrument, the operation was to be completed in three years rather than the usual five years.

The project was financed through a SDR 3.3 million (US\$ 5 million) IDA credit, with a planned Borrower contribution of \$US 1.4 million. The actual Borrower contribution of \$0.66 million was less than the originally planned \$1.4 million because the compensation fund was dropped (and was budgeted for by the government outside of the project) and because the remaining borrower contribution was dropped in the June 2010 restructuring because of budget difficulties of the borrower due to the international financial crisis.

During a level 2 restructuring, the project was extended by 6 months to allow time to carry out civil works for the animal and human health laboratories, which were taking longer than expected to implement.

3. Relevance of Objectives & Design:

a. Relevance of Objectives:

The project was responding to a global emergency, rather than being motivated by existing Bank or national development strategies for Bosnia and Herzegovina. The project was not directly related to the pillars of the Country Partnership Strategy for FY08-11, but was mentioned in the strategy as an example of improving disaster preparedness. But the project objectives were consistent with the Bank's approach in responding to Highly Pathogenic Avian Influenza.

Bosnia and Herzegovina faced a significant risk from avian influenza. An outbreak among wild birds had already occurred in the country in February 2006, and outbreaks in poultry or wild birds had occurred in other nearby countries including Croatia, Turkey, Romania and Germany, so there was a reasonable risk that further outbreaks could occur.

Outbreaks among birds could infect poultry and causes economic losses through bird deaths or culling. The poultry industry was one of the main agricultural subsectors. Poultry farming was largely commercial and industrialized, with 32 million out of 33 million on commercial farms rather than backyard operations. Biosecurity on commercial farms was mostly adequate, but was weak on backyard farms. Avian influenza posed a risk to humans through the possibility of direct disease transmission from infected poultry, and from the possibility that the avian influenza virus could evolve into a form transmissible between humans and could trigger an influenza pandemic.

There were also risks to livestock and humans from other zoonotic diseases, such as brucellosis where sporadic

outbreaks had occurred among sheep and goats since 2000, though the threats from zoonotic diseases went beyond the poultry industry. Brucellosis (which does not affect poultry) became a much more significant threat than avian influenza, with serious brucellosis outbreaks occurring from 2008, though this could not have been predicted at the time of project design. Similarly, it turned out that non-avian influenza was more of a threat to humans than that of avian influenza, with a pandemic of H1N1 influenza in 2009-10.

There were a number of gaps in the capacity to respond to avian influenza and other zoonoses in both the animal health and human health sectors. There was no animal disease surveillance system for any disease, and limited capacity to diagnose or control avian influenza among poultry. The human health surveillance system was very basic with no national surveillance system for communicable diseases, there was no pandemic preparedness planning and institutional responsibilities were unclear and no laboratory capacity for typing of influenza strains.

However, the objectives for this project were narrower than those for many other avian influenza projects. In this case, the objectives referred only to threats to the poultry industry and humans from avian influenza and other zoonoses. They would have been more relevant had they also covered threats to the livestock sector beyond the poultry industry, and to influenza outbreaks beyond those from avian influenza.

The relevance of objectives is rated *Modest*.

b. Relevance of Design:

The design of the project followed the broad template of the Global Program on Avian Influenza, including components on animal health, human health, and communications, all of which would support the project objective. The strategic communication and public information component would inform people about risks from HPAI so that they could take proper protective measures, reducing the risk of disease spread between animals and from animals to humans. Strengthening veterinary surveillance and diagnostic services would allow outbreaks of avian influenza among birds to be identified. Strengthening outbreak control capacity would allow identified outbreaks to be contained. Formalizing and financing a compensation mechanism for culled birds would encourage farmers to report deaths of poultry, which would increase the likelihood of disease detection. Public health planning and coordination improvements would increase the capacity to respond to an avian influenza epidemic or pandemic. Improved public health surveillance and diagnostic capacity would improve the ability to detect outbreaks of avian influenza among humans and so move to respond to them. Strengthening health care response capacity could potentially reduce the number of people infected were outbreaks among humans to arise.

Unlike avian influenza projects in many other countries that did little to address biosecurity weaknesses, the design included a specific subcomponent aimed at improving biosecurity on backyard farms through targeted training programs for small and backyard farmers where biosecurity was weakest.

While the main focus was on avian influenza, veterinary service strengthening would also increase the capacity to respond to some other zoonoses.

The relevance of design is rated *Substantial*.

4. Achievement of Objectives (Efficacy):

In addition to the Bank project, other international organizations including the European Commission, World Health Organization, the Swedish International Development Agency, and the United States Agency for International Development assisted the government in addressing the threat of avian influenza, so not all improvements can be attributed solely to the Bank project, though the project was the largest intervention. Some related outputs were provided outside of the project. 1.5 million Euros was provided by the Bank-financed Agriculture and Rural Development Project towards the animal health laboratory upgrades, and Euro 300,000 was provided by the European Union to pay for design of the human health laboratory.

1. Minimize the threat posed to the poultry industry by Highly Pathogenic Avian Influenza and other zoonoses: substantial

Outputs:

- A range of legislation, regulation, and policy upgrades were completed and adopted, covering registration of poultry farms, biosecurity, surveillance, outbreak response, and standard operating procedures for culling.
- A veterinary health laboratory was rehabilitated and upgraded to BSL 2+ status (upgradable to BSL 3), with the project supporting equipment purchases, training, and civil works. Roughly 1200 samples were tested

using the new equipment. The laboratory is used for diagnostic tests for avian influenza and brucellosis .

- An electronic animal disease management system was established and is in use, though only covering 50% of areas at risk as of project closure .
- An active surveillance program was established, taking samples from 256 wild birds and 312 backyard poultry.
- Equipment for outbreak response was established and distributed, including protective clothing and disinfection equipment, and rapid response teams were established .
- A compensation mechanism for avian influenza was formalized (there was already an existing ad hoc mechanism in place), but no compensation was needed as no culling of poultry occurred . Though project funds for compensation were reallocated to other uses, the borrower guaranteed that government funds would be available for compensation if needed .
- Communications activities were implemented, including development of a communication strategy, media training for public relations officers, and risk communication for veterinarians and government staff . Two communication programs were carried out, one on improving knowledge of safe behaviors on avian influenza, and another (after brucellosis outbreaks had occurred) on avian influenza, other zoonoses, and pandemic influenza

Outcomes:

No outbreaks of avian influenza occurred during the project, but it is not possible to determine whether any outbreaks would have occurred in the absence of the project .

While no quantitative evidence is available, upgrading from conventional PCR laboratory equipment to real-time PCR equipment could plausibly have reduced the time required to generate diagnoses and the accuracy of these procedures.

Simulation exercises were carried out under FAO to test revised response plans, and identified some deficiencies in preparedness (ICR page 31). Other planned simulations were not carried out.

The communication campaign was assessed with a Knowledge, Awareness and Practice survey . The ICR reported that 45 % of the population was aware of avian influenza up from an estimated 25 % pre-project, but did not provide information on whether there was any improvement in behaviors under the project . A second survey was not completed before project closure .

2. Minimize the threat posed to humans by Highly Pathogenic Avian Influenza and other zoonoses : modest

Outputs:

- Influenza preparedness plans were developed, as were laws needed for implementing physical distancing policies to protect the population from infectious disease spread .
- Training materials on clinical management of influenza were developed and distributed to all doctors working in intensive care units .
- Rapid response teams were established, trained, and provided with protective and sample transport equipment.
- Only a limited contribution to human health surveillance was made, with improved communications through IT equipment.
- Equipment, training, and consumable supplies were provided to the existing human health virology laboratory. A new human health laboratory was designed (but not using project funds) but was not constructed, as it was discovered that new laboratories would be more expensive than originally planned, and it was decided that project funds would have a higher impact by focusing on completing construction of one new laboratory rather than trying to work on both animal health and human health laboratories .
- A stockpile antivirus was established, with 10,600 doses purchased under the project. An additional 14,000 doses were supplied outside of the project .

Outcomes:

No cases of avian influenza in humans were identified during the project .

Serious outbreaks of brucellosis occurred in sheep and goats starting in 2008. The ICR does not provide data on the magnitude of these outbreaks, but roughly 25,000 animals and 1,700 humans were infected by the end of 2011 (USDA Foreign Agricultural Service, Global Agricultural Information Network, Report Number BK 1302). By 2011, 75,000 animals have been culled to control brucellosis with cumulative economic losses of \$ 9.8 million due to the disease.

5. Efficiency:

The project conducted an economic analysis at appraisal with an estimated rate of return of 25%. This analysis estimated the project benefits from reduced likelihood of outbreaks among birds, assuming that the annual likelihood of an outbreak of avian influenza was 100% for a mild outbreak and 40-50% for a catastrophic outbreak without the project (causing poultry deaths of 5% and 25% respectively), declining to likelihoods of 80-90% and 30-38% with the project. The estimate covered only benefits from prevented deaths of poultry, but relied on assumptions that are highly speculative. At closure, the ICR correctly identified that since no outbreaks of avian influenza occurred that an ex post economic analysis would not be meaningful.

While little evidence is provided in the ICR on cost-effectiveness, there are some sources of efficiency. The project improved its efficiency by shifting from support for up to 7 veterinary laboratories to focus on a single national laboratory. Bosnia and Herzegovina is a small country, and it is not difficult to transport samples to a central location, so extensive capacity at regional laboratories was not necessary. Some efficiency gains were made (and supervision costs were reduced) by collaborating closely with the Agriculture and Rural Development Project, including joint supervision missions. The ICR reports that cooperation between the animal and human health ministries and agencies was effective, and that coordination with UN agencies and other donors helped to avoid overlap or duplication of activities.

Project efficiency is rated *Substantial*.

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

	Rate Available?	Point Value	Coverage/Scope*
Appraisal	Yes	25%	60%
ICR estimate	No		

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

6. Outcome:

While avian influenza posed a real threat to Bosnia and Herzegovina, the objectives were very narrow and did not cover the threats that actually emerged (brucellosis, which does not affect poultry, and a pandemic of non-avian influenza), leading to a *modest* relevance of objectives. The project design followed the global program on avian influenza template and was likely to achieve the objectives, leading to *substantial* relevance of design. *Substantial* progress was made on minimizing the threat posed by avian influenza to the poultry industry through improvements to animal health surveillance and diagnostic capacity, but only a *modest* contribution was made to minimizing the threat posed to humans. While it is difficult to conduct a meaningful economic analysis of the project, several steps were taken to improve project efficiency and so efficiency is rated *substantial*.

Together these lead to the outcome being rated *Moderately Satisfactory*.

a. Outcome Rating : Moderately Satisfactory

7. Rationale for Risk to Development Outcome Rating:

The ICR notes (page 17) that some additional activities for the BSL 2+ animal health laboratory are being supported by the Bank-financed Agriculture and Rural Development Project, and that the government and implementing agency are committed to ensuring that sufficient resources are available to sustain the laboratory's capacity and operations. No other evidence on the risk to development outcome (or lack of risk) was provided by the ICR.

a. Risk to Development Outcome Rating : Moderate

8. Assessment of Bank Performance:

a. Quality at entry:

The project design followed the broad template of the global program on avian influenza, and incorporated

good practice elements such as addressing avian influenza through both animal health and human health sectors, including communications and awareness programs, and a compensation mechanism to encourage reporting by farmers.

The project of design recognized the possibility of implementation and commitment weaknesses that could hinder project implementation, but did little to address risks in whether completion of project outputs would achieve the desired objectives.

An emergency instrument may not have been suitable for the project. There was no emergency on the ground in the country, there was already a moderate level of capacity to diagnose and respond to outbreaks of avian influenza and poultry, and nearly all project supported activities were capacity building improvements that would take years to implement. It may have been more effective to fold the project activities into the Agriculture and Rural Development Project, which was already in preparation and reached effectiveness just prior to the effectiveness of the avian influenza project.

The original project design did not pay enough attention of the institutional challenging of working in Bosnia and Herzegovina, and the complex and unclear relationships between agencies at the national and sub-national entity level. This contributed to slow early progress and significant delays in achieving project effectiveness, with 11 months passing between project appraisal and approval, and an additional 9 months between approval and effectiveness.

The implementation arrangements called for directly embedding the project in the implementing agencies rather than creating a separate project management unit. There were no explicit component coordinators or an overall project leader. This hampered early implementation until the decision was reversed: full time component coordinators were added to the design by the time of project effectiveness and the veterinary agency was placed in charge of the project.

The original design underestimated the cost of laboratory upgrades, leading to a need for a significant redesign of project activities related to laboratory construction and improvement.

Quality-at-Entry Rating : Moderately Unsatisfactory

b. Quality of supervision:

The Bank fielded six supervision missions during the project, which were adequately staffed including health and veterinary specialists in most missions and a communications /operation specialist on one mission. The project supervision (including missions) worked in concert with supervision of the Agriculture and Rural Development project, ensuring that project activities were well coordinated.

Interim support missions were organized in response to specific problems in implementation, such as delays in disbursement or procurement. The ICR reports (page 19) that mission aide memoires were comprehensive and well prepared, and clearly articulated agreed actions. The Bank offered strong support for procurement throughout the project.

The Bank responded to client requests, such as adjusting the project to provide some support during the 2009-10 influenza pandemic. The Bank facilitated discussions between the various stakeholder ministries and assisted the ability of the ministries to reach agreements.

The midterm review process was effective in recognizing weaknesses in the original design and restructuring the project to focus on activities that would be achievable by project closure. Over 80 percent of project disbursement happened after the midterm review, and the project was fully disbursed by project closure with only a 6 month extension.

Quality of Supervision Rating : Satisfactory

Overall Bank Performance Rating : Moderately Satisfactory

9. Assessment of Borrower Performance:

a. Government Performance:

The government agencies were initially somewhat indecisive, in part because while they "had the technical capacity to make decisions, they often did not have the political mandate to do so, in part due to the notion at political levels that the risk had been averted since the pandemic never declare " (ICR page 9). The ICR notes that the government was always supportive of the project objectives (ICR page 19), but that delays were in part caused by a low government prioritization and modest government ownership . There were significant difficulties and delays in reaching agreements between the national and sub -national government ministries, which hampered implementation .

However, decision making improved over time particularly following midterm review, and the government performed well in making decisions about the restructuring . Once agreements and mechanisms for implementation had been fully agreed, there was sufficient government support to allow the project to proceed without significant disruptions .

Government Performance Rating

Moderately Unsatisfactory

b. Implementing Agency Performance:

The project was implemented through a Technical support group consisting of technical advisors representing the State Veterinary Office in Ministry of Foreign Trade and Economic Relations, the Ministry of Civil Affairs, and the Ministries of Agriculture and Health in the two political entities that make up Bosnia and Herzegovina: the Federation of Bosnia and Herzegovina and the Republika Srpska . The main coordinating agency was the State Veterinary Office . The ICR reports (page 20) that the State Veterinary Office demonstrated strong commitment to achieving the project objectives across all components .

Weaknesses in implementing agency capacity and unclear responsibilities lead to long delays in reaching project effectiveness and in project implementation . There were significant delays in mobilizing units responsible for contract administration, procurement, and financial management . But eventually experienced staff were put place and these functions were able to proceed smoothly .

Coordination between the implementing agencies was mixed . Animal health and human health agencies were represented in the technical support group and eventually reached agreement on making necessary decisions, but there were some difficulties in getting implementing agencies to share data . Once component coordinators were established, leadership was consistent with low turnover staff turnover until near project closure when most activities had been completed .

Relationships with partner agencies including USAID, WHO, UNICEF and WHO were excellent . Project implementation was undertaken in close consultation with other donors .

Implementing Agency Performance Rating :

Moderately Satisfactory

Overall Borrower Performance Rating :

Moderately Satisfactory

10. M&E Design, Implementation, & Utilization:

a. M&E Design:

The monitoring and evaluation design was more substantial than for many other avian influenza projects, though most outcome indicators would only be relevant in the case where avian influenza outbreaks occurred . There were no outcome indicators covering zoonoses other than avian influenza .

Specific indicators focused mostly on tracking achievement of project outputs, such as adoption of legislation, distribution of laboratory equipment, and training of personnel . The indicators covered nearly all project activities. However, most indicators were qualitative, which could make them difficult to monitor .

The design specified which agencies were responsible for reporting on which indicators .

b. M&E Implementation:

Though results framework at design was quite comprehensive, not all indicators were tracked during implementation. Reporting was weak early in the project, but improved in the last two years, when an M&E specialist was hired by the Ministry of Foreign Trade and Economic Relations to monitor reporting on all investment projects under its responsibility .

For some outcome indicators in the design, only outputs were tracked . For example, for an outcome indicator on "behavior changes among key veterinary and public health personnel ", the system recorded only delivery of training, workshops and communication guidelines . For an indicator on "improved public awareness of how to prevent spread increases and behavior changes ", the system reported only on indicators on public awareness of avian influenza .

c. M&E Utilization:

The ICR does not provide evidence on M&E utilization .

M&E Quality Rating : Modest

11. Other Issues

a. Safeguards:

The project was not expected to generate significant adverse environmental impacts, and so received Environment category B. Environment-related issues addressed by the project were procedures for culling and disposal of poultry, handling medical waste, and civil works . No other safeguards were triggered .

An environmental management plan was prepared and was available at appraisal . A supervision mission assessed compliance with the plan for the animal health laboratory in Stup and found compliance to be satisfactory .

Late in the project, an occupied residence was reported on the site for the laboratory that had been previously unnoticed during the site survey . A full investigation was led by the Bank, concluding that the involuntary settlement safeguard OP4.12 did not need to be triggered .

b. Fiduciary Compliance:

The ICR reports (page 19) that procurement and financial management were satisfactory and that all financial management reports were provided on time and were unqualified .

The implementing agencies were unfamiliar with Bank financial management and procurement systems, and this led to significant implementation delays including multiple cases of repeat procurement . A procurement review undertaken in late 2009 found no significant problems in procurement and satisfactory contract management .

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c. Unintended Impacts (positive or negative):

The ICR notes that the project has led to improved cooperation between the animal health and human health sectors .

d. Other:

Though the project objectives formally only covered avian influenza and other zoonoses, many project activities were also intended to support capacity to respond to influenza outbreaks and pandemics other than those from avian influenza . Activities that increased pandemic preparedness would apply to both avian influenza and non-avian influenza . During the response to the 2009-10 non-avian influenza pandemic, respirators, intensive care units, and antiviral provided by the project were used to mitigate the pandemic . The project purchased 10,000 doses of influenza vaccine in 2009-10 and 15,000 in 2010-11, and distributed them to high priority groups . Standard operating procedures developed under the project for an avian influenza outbreak among humans were used in public communication and in hospital triage and biosecurity procedures . The overall impact of these measures is unclear .

Though no evidence was provided in the ICR, the project activities may also have increased the capacity to

respond to brucellosis outbreaks in sheep and goats .

Strengthening of institutions may have helped the country to move closer to compliance with EU standards .

12. Ratings:	ICR	IEG Review	Reason for Disagreement / Comments
Outcome:	Moderately Satisfactory	Moderately Satisfactory	
Risk to Development Outcome:	Moderate	Moderate	Risks are difficult to assess as the ICR did not provide information on the risks to most project achievements.
Bank Performance :	Satisfactory	Moderately Satisfactory	Weaknesses in the design of implementation arrangements contributed to long delays in reaching effectiveness.
Borrower Performance :	Moderately Satisfactory	Moderately Satisfactory	
Quality of ICR :		Satisfactory	

NOTES:

- 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 identifies the following lessons:

- A global template can enable rapid, good project design . The Global Program on Avian Influenza assisted the project in establishing a project design that covered the most important elements needed to reduce the risk of avian influenza .
- Close coordination with specialized UN agencies can enhance technical assistance . WHO, UNICEF and FAO provided technical assistance in close coordination with the Bank and the project implementing agencies.
- It is difficult to map progress on implementation without full time project coordinators .

IEG also notes that:

- The Bank can play a useful role in facilitating discussions between multiple agencies and ministries in complex institutional environments .
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14. Assessment Recommended? Yes No

15. Comments on Quality of ICR:

The ICR provided a significant amount of information, but it was not written in a way to easily identify the impacts of the project.

- It inaccurately described the project objectives, adding a second phrase "and to prepare for, control, and respond to an influenza pandemic and other infectious disease emergencies in humans ". While it would have been helpful for the project objectives include this phrase, it was not present in the appraisal document or financing agreement and the objectives were not formally revised .
- It could have been more clear in identifying precisely what changes to project design were made in restructuring, rather than using this section as an implementation narrative .

- It rated achievement of objectives by component, rather than by objective . It listed project outputs but it was not always clear whether these outputs had been completed by project closure, and there was little evidence on assessing the impact on outcomes . Not much information was provided on outbreaks of brucellosis, a zoonotic disease which has been much more serious in Bosnia than has avian influenza .
- The ICR provided information on the sustainability of the animal health laboratory, but not on other project achievements.
- The ICR provided information on actual total project expenditure, but did not provide a breakdown by component (the data in section 2c above was retrieved separately from the Bank's operations portal).
- Many of the acronyms used were not defined .

ICR quality is rated Satisfactory, albeit marginally so .

a.Quality of ICR Rating : Satisfactory