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EVALUATIONS OF PROTRACTED REFUGEE AND DISPLACED PERSON PROJECTS

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PROJECT BANGLADESH 5329

Evaluation of WFP assistance to refugees from Myanmar in Bangladesh and for their reinstallation in Myanmar

Total food cost	15 968 855 dollars
Total cost to WFP	22 084 357 dollars
Date of approval of project	28 October 1993
Date of first food distribution	18 January 1994
Duration of project	36 months
Official termination date	31 December 1996
Date of evaluation	October 1995
Duration of project at time of evaluation	One year and nine months
Composition of mission	WFP/FAO ¹

All monetary values are expressed in United States dollars, unless otherwise stated. In October 1995, one United States dollar was equivalent to 40 Bangladeshi taka. The official exchange rate of the Myanmar kyat varies slightly at about six kyat per dollar. During WFP's presence, unofficial rates fluctuated between 98 to 125 kyat per dollar.

¹ The mission consisted of: a senior evaluation officer, WFP (team leader), the senior desk officer for Bangladesh and Myanmar, WFP; and an agro-economist, FAO.

ABSTRACT

Food assistance to the Rohingya refugees in Bangladesh has been properly managed and distributed. In Myanmar, the food component of the repatriation package given to the returnees and the duration of food assistance appear to be adequate except for the extremely vulnerable individuals (EVIs). Most EVIs, often households headed by women, are scattered over the repatriation area and difficult to reach. It is, however, anticipated that the Myanmar Red Cross, when fully established in Rakhine State, will be in a position to address this problem. Some 80 percent of the returnees are landless. Wage-paid labour opportunities are very scarce. The WFP staff has wisely adapted the experience gained with repatriation operations in Cambodia and developed food-for-work activities of interest to the community. Since rehabilitation and, when feasible, development activities can contribute to pre-empt the possibility of a renewed exodus, food-for-work activities should be continued on an expanded scale, with additional resources, after mid-1996 when repatriation is expected to come to an end.

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2. Pursuant to the decisions taken on the methods of work by the Executive Board at its First Regular Session, the documentation prepared by the Secretariat for the Board has been kept brief and decision-oriented. The meetings of the Executive Board are to be conducted in a business-like manner, with increased dialogue and exchanges between delegations and the Secretariat. Efforts to promote these guiding principles will continue to be pursued by the Secretariat.
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4. The WFP staff dealing with this document are:

Director:	W. Kiene	tel.: 5228-2029
Evaluation Officer:	P. Terver	tel.: 5228-2030
5. Should you have any questions regarding matters of dispatch of documentation for the Executive Board, please contact the Documents Clerk (tel.: 5228-2641).

BACKGROUND

1. In late 1991, civil disturbances in the Rakhine State of Myanmar prompted a renewed exodus of a sizeable portion of the Rohingya minority community (Muslim by religion) to Cox's Bazaar and Bandarban districts of Bangladesh. Similar situations had occurred in the fifties and in 1978, with the majority of the refugees eventually returning to their home areas close to the border.
2. In Bangladesh, WFP and UNHCR, under a joint programme, assisted the refugee population, which had grown to over 250,000 by mid-1992. WFP food assistance began in April 1992.
3. Repatriation of refugees started in September 1992 under an agreement between the Government of Bangladesh and the Government of the Union of Myanmar.
4. At its Thirty-sixth Session, the CFA approved a new protracted refugee project (PRO) Bangladesh 5329, for the supply of food commodities to an average of 200,000 refugees for the period 1 January 1994 to 30 June 1995, at a total cost of 26.5 million dollars.
5. With the UNHCR and WFP presence established on the Myanmar side of the border, from January and April 1994 respectively, repatriation started in earnest. Between April 1994 and June 1995, some 139,000 refugees returned to Myanmar under the joint UNHCR/WFP operation. However, since July 1995, coinciding with the rainy season, repatriation has slowed down to a trickle. It is anticipated that there will be a residual case-load of several thousand refugees who, for a number of reasons, will not have repatriated by mid-1996. All refugees in Bangladesh will continue to receive support from resources available under PRO 5329 throughout 1996.

WFP ASSISTANCE TO REFUGEES IN BANGLADESH

Number of refugees

6. In mid-1992 the influx of Rohingya reached a total of 250,877 registered refugees, residing in 20 camps. The last head-count was carried out in April 1995, giving a total of 54,459 refugees for the eight remaining camps.
7. After repatriation of more than 78 percent of the refugees, in the remaining case-load the number of women is higher and the age structure younger than at the time of registration. In fact, from April 1992 to September 1995, the number of births in the camps was 25,014 as against 6,880 deaths. It can be presumed that the remaining refugee population is more vulnerable than it was over the past two years because included in this group are all refugees who, though cleared, have not yet been repatriated for medical reasons. Another indirect sign of vulnerability is the



number of families headed by women: 26 percent against less than five percent at the time of initial repatriation. However, this percentage could be inflated because the refugees have learned to declare large families as split into two single families, so as to reap the benefits that are granted to each family group.

Institutional arrangements, food management and local purchases

8. The mission found food handling and distribution arrangements satisfactory. Cooperation between all parties involved was also good. Particular credit has to be given to the Government of Bangladesh, which has always advanced the rice required, and at times also the vegetable oil. As for all food aid programmes, the Government's public foodgrain distribution system, with its extensive network of storage depots, has been most useful. The possibility to purchase locally a substantial part of all commodities except vegetable oil has represented another valuable asset. The mission did not notice, nor was informed of any "leakage" or loss of commodities during transport or storage at the camps.

WFP overall commitment

9. From April 1992 WFP provided food assistance through four phases of emergency operation Bangladesh 4999, and then through PRO 5329.
10. Ongoing PRO 5329 was to cover the feeding requirements of 200,000 refugees over a period of 18 months, starting from January 1994. While the duration of PRO 5329 has doubled, having been extended to the end of 1996, there has been an overall net saving for WFP of 4.4 million dollars. This has been made possible by:
 - a) the rapid repatriation of large numbers of the beneficiaries;
 - b) lower requirements for supplementary (SFP) and therapeutic (TFP) feeding programmes than initially estimated;
 - c) the non-utilization of the 10 percent of the cereal reserve earmarked for development activities for the host population.

This saving can be assumed to correspond roughly to the cash used in Myanmar to provide relief assistance.

Food rations and their adequacy

11. Different food baskets were envisaged for general distribution: dried fish was to be distributed only during the dry season; for the rest of the year, the ration of pulses was to be increased by 10 grams. In practice, it has been impossible to comply with this condition and most of the time the larger ration of pulses was distributed.
12. All returnees indicated that they were satisfied with the food rations received, in terms of quality and quantity, as well as with regard to fairness of distribution. However, the mission was informed that a significant number sell part of their ration in order to obtain cash to buy essential items such as kerosene or clothes.



13. Quantities of food are limited and it is therefore unlikely that there is any disincentive to local food production.
14. It should also be noted that, in several camps, the authorities have questioned the logic of distributing full individual rations to infants from the day of birth arguing that it constitutes an incentive to produce children.

Supply and local production of blended food

15. Since October 1992 blended food has been included in all the feeding programmes (general, SFP and TFP). The provision of blended food for general distribution was the responsibility of UNHCR up to the end of December 1994 and was passed on to WFP thereafter. In the case of SFP and TFP, this change took place with the commencement of PRO 5329.
16. To overcome procurement difficulties from suppliers abroad, at the beginning of 1993 arrangements were made for the production of blended food through a local NGO. Experience has not been fully satisfactory and production started only in mid-June 1994. However, the timely supply of the relatively modest quantities of blended food required for SFP and TFP has been ensured.
17. Difficulties in external procurement have resulted in interruptions in the provision of blended food under general distributions. The absence of blended food has always been compensated by an increase in the daily ration of pulses (by 10 grams), vegetable oil (by 10 grams) and sugar (by five grams).

Health and nutrition

18. Initially, malnutrition levels in the various camps ranged between 13.1 and 39.7 percent. From early 1993, the health services, immunization campaign, safe water and sanitation facilities and the regular provision of food assistance coupled with the distribution of blended food to malnourished children and to adults at risk (mainly expectant and nursing mothers) resulted in considerable improvement in the health and nutritional status of the refugees, comparing favourably with the status of the host population. However, during the nutrition survey conducted in August 1995, it was found that global malnutrition was 9.5 percent, which is acceptable but nevertheless higher than the 7.2 percent found during the 1994 survey. The explanation given is that the refugees repatriated were in relatively better health than those remaining in the camps.

Gender issues

19. The role of Rohingya women is restricted by a conservative and strict code of conduct. The refugees belong to the poorer section of the Rohingya population, which is overwhelmingly illiterate. The maternal and child care sessions provided in the camps by the various NGOs probably constituted their first contact with external education. Promotion sessions are conducted for all returnees, aiming in particular at facilitating their reintegration in Myanmar, and separate sessions are being organized by UNHCR for women, as they do not attend the general ones.



20. The very high incidence of households headed by women has already been mentioned. They constitute the bulk of the EVIs, who qualify for a further two months' food assistance when back in Myanmar (i.e., a total allowance of four months).
21. Although it is mainly men and male children who collect family food rations during weekly distributions, women (usually single heads of household with only small children) also go to receive their rations.

Refugee activities

22. Since the Government of Bangladesh considered that it could not give long-term asylum to the refugees, no solution other than voluntary return to Myanmar was ever envisaged. As a result, the refugees have not been allowed to take up any type of employment or economic activity (including vegetable gardening at the camp sites) and the establishment of schools has been discouraged. However, as population pressure in the camps has reduced because of repatriation, family vegetable gardens have been created. Furthermore, there is now some elementary teaching. It was felt by the mission that training, particularly in the basics of the Burmese language which is usually not spoken by the refugees, could have facilitated their eventual reintegration in Myanmar.
23. Although the refugees were not officially permitted to work, many of them in fact did so. In the absence of reliable statistics, the mission was not in a position to determine whether this had any serious negative effect on the local labour market. In addition to casual agricultural employment, refugees collect fuelwood to complement their compressed rice-husk fuel allowance or for sale.

Environmental impact

24. Construction of shelters and fuel for cooking are responsible for progressive deforestation. It is estimated that 2,800 hectares of forest have been depleted, despite the fact that UNHCR organized the free distribution of compressed rice husk to satisfy fuel needs.
25. Cox's Bazaar Forest Division has implemented a UNHCR project for replanting 284 hectares of forest and has recently replanted the land of the evacuated camps. Furthermore, a project consisting of 3,000 hectares of forest plantation to rehabilitate the degraded areas is still being negotiated and WFP involvement through food for work is, a priori, feasible.

Relations with the host population

26. Although some resentment was felt among the host population with regard to the conditions of assistance granted to the refugees, no significant problems of co-existence were reported. UNHCR financed a 3.2 million dollar project for the benefit of the host population ("Assistance to affected Bangladesh villages") for the construction of infrastructure.



Utilization of the food-for-work reserve

27. The 10 percent of the cereal reserve of PRO 5329 earmarked for development activities for the host population has not been used. The mission considers that it could have been satisfactorily utilized in the UNHCR projects aimed at mitigating the negative effects of the influx of refugees. UNHCR projects ("Assistance to affected Bangladesh villages and forestry") had components using intensive unskilled labour which could have been remunerated in part with food assistance, thus releasing cash resources for the creation of additional assets.

Repatriation process

28. In order to dispel any doubts about the voluntary character of the repatriation, UNHCR has decided that for verification purposes final interviews by UNHCR staff with heads of family will take place in private. UNHCR is satisfied that any refugee who wishes to opt out of repatriation because of a valid claim is free to do so. This is the case for an estimated 5,000 individuals who chose not to sign up for repatriation during the initial registration. In addition, a significant number have subsequently indicated that they do not wish to return — many of them for family or health reasons. Although divergent views exist regarding the voluntary nature of repatriation, donors have generally supported the UNHCR position. Several agencies have expressed serious doubts about the adequacy of information given to the refugees on the situation in Rakhine State. In March 1995 such concerns were expressed by Médecins sans Frontières (France and the Netherlands).

WFP ASSISTANCE TO RETURNEES IN MYANMAR

Repatriation package

29. Before leaving Bangladesh, returnees are given food for two weeks and repatriation kits. On arrival in Myanmar, they receive various repatriation grants in cash from UNHCR. During their brief stay at reception centres, returnees also receive cooked meals prepared with WFP food by the Immigration and Man Power Department (IMPD). Through the Myanmar Relief and Resettlement Department (RRD), WFP distributes a two-month food allocation.
30. The consensus is that two months' food assistance is sufficient for the majority of returnees. A longer period of assistance could have created a dependency syndrome and resentment on the part of others in the community who are equally poor. This is particularly the case of returnees who came back prior to United Nations involvement and received a retroactive cash grant but no food.



Socio-economic conditions in the resettlement area

31. Virtually all returnees have been able to move back into their former homes and to regain any lands they previously cultivated. However, according to UNHCR, some 80 percent are labourers who never had access to land for cultivation, and this has not changed on their return. Many returnees therefore remain extremely poor, particularly during the dry season, when agricultural employment is scarce. Furthermore, the Government of the Union of Myanmar's policy of establishing model villages for Arakanese people who live in Rakhine State and are transferred into the repatriation area is likely to increase the number of landless people, since the creation of model villages inherently includes the transfer of agricultural land from the pre-existing villages.
32. From data collected by the mission, it appears that the repatriation area has a rice deficit of some 19,500 tons. Rice procurement by the Myanmar Agricultural Produce Trading (MAPT), a Department of the Ministry of Trade, exacerbates the overall rice deficit. There is no danger of WFP assistance creating local market displacement or constituting a disincentive to production.
33. Since the major part of the returnees do not have any farm land, they have to find casual work for their subsistence. Most of the families interviewed reported only marginal earnings from various sources of daily income. From the interviews conducted, it was clear to the mission that the poorest in the Rohingya community had left for Bangladesh in late 1991.

Compulsory labour

34. Living conditions made arduous by the imposition of unpaid, compulsory labour for up to 10 - 12 days a month, have already been, both in 1978 and in late 1991, the main cause of the Rohingya exodus. Conditions, however, appear to have improved, at least in Maungdaw township. It is generally reported that, on average, only two to four days of labour a month are at present imposed. But there are seasonal and regional variations which do not make it possible to draw a general conclusion; for instance, in border areas, portage for the military is reported to impose a much heavier toll on local populations.

Institutional aspects

35. The main government counterpart for repatriation is IMPD. For returnee movements, registration, payment of cash grants, etc. IMPD has been efficient as it is technically familiar with the work, especially as this is the second repatriation in 15 years. With regard to reintegration, however, IMPD has been less successful.
36. RRD is responsible for the storage, handling and distribution of WFP food. In recent months, it has also been involved in a small amount of logistics, mainly the forwarding of food from Maungdaw to extended delivery points along the Naf river. With close supervision, monitoring and financial support, RRD work has been reasonably successful, but the Department is not prepared to assume additional tasks such as food-for-work projects.



37. An essential element is Border Immigration Headquarters, commonly referred to by its Myanmar acronym, NASAKA, which is the highest authority for the Maungdaw township. Of utmost importance is the degree of understanding and sympathy shown by its Director for what the United Nations is trying to do for the returnees, particularly with regard to protection and reintegration.
38. The UNCHR has developed a number of small-scale projects and has promoted the establishment of village development committees (VDCs), along the lines of a UNDP model already experienced elsewhere in Myanmar.
39. To date, Action internationale contre la faim (AICF), specialized in water and sanitation, is the only international NGO which is truly operational. National NGOs are few in number and weak. The Myanmar Red Cross Society has only recently sent full-time staff to work in Maungdaw, but it is expected to develop rapidly with UNHCR support and help in reintegration activities.

Food-for-work (FFW) activities

40. Support to reintegration with FFW micro-projects was envisaged as a suitable strategy right from the onset of the repatriation operation and was included in the UNHCR/WFP joint appeal of December 1993. It was conceived as an important component but secondary to relief feeding. Intensive preliminary research in the field - involving, whenever possible, the VDCs - was carried out by WFP staff in 1994. During the dry season, after harvesting, 104 projects were successfully completed, creating some 113,000 days of much-needed casual employment, mainly in Maungdaw township. WFP has had to implement nearly all FFW projects, under the supervision of an expatriate and through a network of locally-recruited area supervisors.
41. The assets created consist of 32 stretches of road and 72 communal ponds. The roads facilitate the movement of people and goods, particularly for the poorer and more isolated villages. The increased water storage helps to improve living conditions, especially during the dry season in areas where there are no permanent streams and wells are not feasible. The two sectors (ponds and roads) have proved to be a successful choice.
42. The market value of the daily FFW food ration is slightly above the daily wage for unskilled work. It is estimated that the average duration of employment was five to six days and that some 22,600 landless rural labourers were involved in FFW activities. FFW rapidly became popular and, at the village level, the main concern soon became the fair sharing of FFW. As casual employment in agriculture generates no more than 20 to 30 days of work a year, the income transfer through FFW is modest but not insignificant. Some 75 to 85 percent of the workers were returnees.
43. During the coming 1995/96 dry season, WFP intends to triple the output of FFW projects. The target is to undertake the construction of 120 kilometres of roads and to entrust the digging or rehabilitation of ponds to AICF. FFW activities will be equally shared between Maungdaw and Buthidaung townships. Pilot projects in the construction of mini-dams and dikes for irrigation are also programmed. Furthermore, the country office will continue its efforts to develop joint FFW



activities with UNHCR and other NGOs. However, the issue of regular maintenance will have to be addressed, as the mission already observed a few cases of deterioration.

44. It is the mission's opinion that, with increased donor support, FFW activities should be continued and expanded. FFW as an alternative to compulsory labour and as an investment to reduce the need for such labour should, perhaps, also be considered in a wider context than just Rakhine State.

Gender issues

45. The role of women is mostly confined to the home and family compound. They do not work in the fields. Within the family compound, women are involved in the storage and preparation of food and they are able to grow vegetables and raise small livestock. To this effect, UNHCR and the Department of Agriculture have implemented a seed distribution project for vulnerable women. UNHCR is also planning projects for the supply of goats and chickens to groups of women and to train them in income-generating activities.
46. The distribution of rations does not appear to be disadvantageous to women. Although it is mainly men and children who collect the food rations, women are never far from the warehouse, and they certainly participate in the division of food amongst families in the distribution group.
47. Women participated as workers in FFW activities in only one pond-digging project. These women were recently displaced from southern Rakhine State, where traditions are less restrictive.
48. In principle, at least one woman is expected to participate as a member of the VDC. In practice, this woman may not have the opportunity or experience needed to voice a point of view. In some cases, UNHCR has tried to organize women's sub-groups to generate ideas and encourage women to speak out. WFP supports UNHCR in this approach, and likewise promotes the involvement of women in the VDC decision-making process.
49. WFP provides food as an incentive to participants in projects managed by UNHCR and NGOs; for example, to women who learn to weave fish-nets as compensation for time spent away from their regular home duties. This project also attempts to organize women into groups and introduce them to ideas about marketing and income-generation.
50. UNHCR has identified EVIs in the camps and this is shown in their repatriation documents. Most are female heads of single-headed households. Each EVI receives an extra food ticket which gives entitlement to a second allocation of rations for two months after arrival in Myanmar. By the end of September, 3,827 EVIs had benefited from a second allocation. This is far short of the number of beneficiaries originally foreseen. When fully established, the Myanmar Red Cross Society will be in a position to address the problem of EVIs.



Food purchases

51. As requested by the Government of the Union of Myanmar, WFP has purchased all commodities in the country. In the case of rice and pulses, these commodities have been supplied by MAPT. All purchases by the country office were authorized by WFP headquarters, which in each case ascertained that MAPT provided rice and pulses at highly competitive prices. Nevertheless, it should be recalled that the Government gets most of its rice through a tax obliging farmers to sell a large portion of their paddy at prices well below market levels. For this reason, some countries may have been reluctant to contribute to food purchases for the operation.
52. WFP purchases palm-oil and sea-salt from Rakhine State. WFP headquarters approved all contracts following an analysis of prices from alternative outside sources. Unfortunately, there have been frequent failures in timely delivery of the oil.

Distribution and logistics

53. Contrary to the Memorandum of Understanding (MOU) between WFP and UNHCR, as in Bangladesh, WFP is responsible, through RRD, for the distribution of food rations to returnees at the repatriation centres. This arrangement has streamlined the overall work of food handling, thus improving efficiency, cost-effectiveness, control and monitoring. The distribution system is similar to that successfully adopted by WFP in Cambodia. At each reception centre, notice-boards, bearing notices in Burmese and Bengali, inform returnees of their food entitlement.
54. To prevent abuses in food-for-work projects, WFP has developed a standard project agreement with strict terms regarding distribution and monitoring. At least five workers must be present for the hand-over of food to VDC representatives at the warehouse. WFP also plans to monitor distribution at a number of the project sites.
55. In spite of the very serious logistic difficulties, transport costs have been contained within the ITSH average of 36 dollars a ton. Food losses have been negligible (and represent 0.66 percent of the total quantity transported, mainly resulting from a cyclone and the accidental sinking of two transport boats. The key to this success has been the ability to keep stocks at minimum levels, thanks to the cooperation of the MAPT office and rice mill at Maungdaw which allowed WFP to borrow when stocks were low.



RECOMMENDATIONS

56. The mission made the following recommendations:

WFP operations in Bangladesh

- a) Although the UNHCR/WFP food assessment mission of April/May 1993 decided that identical rations were to be supplied to adults, children and infants, the mission recommends the distribution of general rations for infants be re-examined. The distribution system, as organized in the camps, would not be hampered if infants were not provided with general rations from the day of birth.
- b) The project prepared by Cox's Bazaar Forest Division, for the plantation of 3,000 hectares to rehabilitate the degraded areas, should be implemented as soon as possible. The mission recommends that the local WFP office cooperate with the regional forestry authorities to study the possibilities of utilizing resources from project Bangladesh 2197 (Exp. 9) - "Rural development programme", to implement this project.
- c) Considering that since June 1995 the number of new births among refugees in Bangladesh has exceeded the number of repatriations, both governments should intensify their efforts to reach a mutually satisfactory agreement for resumption of voluntary repatriation at a sustained level so as to terminate the operation as soon as possible in the first half of 1996.

WFP operations in Myanmar

- a) Rehabilitation would require a better understanding of the beneficiaries' living conditions. Therefore, the mission recommends that a limited socio-economic survey be conducted, possibly by UNHCR in consultation with WFP, for establishing a typology of the Rohingya population, especially regarding access to land and income.
- b) WFP food-for-work activities are implemented through VDCs, which undertake that the assets created will be maintained. Field visits at the end of the rainy season evidenced that maintenance has to be monitored closely. It is therefore recommended that the WFP local office, in consultation with UNHCR, conduct an evaluation of road and pond maintenance before the onset of the next monsoon.
- c) Activities to be implemented with food for work for the immediate benefit of all the community are limited to village roads and ponds. Beneficiaries are involved for a very limited duration. A United Nations presence is essential in Rakhine State to consolidate the repatriation. WFP should continue to be present beyond mid-1996 when repatriation and distribution of relief assistance are expected to come to an end. Rehabilitation activities can contribute to



pre-empt the possibility of a renewed exodus. In this perspective, FFW activities should be continued on an expanded scale, with additional resources. The mission considers that new areas for activities should be investigated, as follows:

- i) The resettlement area has the potential to develop double-cropping by using gravity irrigation from small dams, the construction of which is labour-intensive and would involve the local population (direct and indirect beneficiaries). Construction of dikes to prevent the intrusion of salty water on agricultural land should also be investigated. These works would involve the local technical services (agriculture and irrigation) which have accumulated some experience, especially regarding dam construction. Before starting operations, a technical and economic appraisal should be conducted, with due consideration given to technical monitoring.
 - ii) The WFP office in Myanmar should consider, together with the competent forestry authorities, the possibility of enlarging the government plantation programme through the use of FFW. It is also recommended to study, on an experimental basis, the possibility of establishing woodlots at the hamlet level with seedlings produced in the local forestry nurseries.
- d) An independent study of FFW potential in Myanmar as a conceivable alternative to compulsory labour could be of use to potential donors. Such a study should also clarify the commitment and capacity of the Government to provide the necessary technical support.

LESSONS LEARNED

57. At the onset of any refugee operation, it is essential that modalities of cooperation between WFP and UNHCR in the field of development operations of direct interest to the host population be explored in depth. Earmarking food resources for development activities appears to be insufficient to induce the required synergy between UNHCR and WFP. A separate development sub-project should be formulated with a thorough technical and socio-economic appraisal.
58. From the beginning, primary and adult education should be foreseen, even if it is anticipated that the operation will be of a relatively short duration. In addition to extension information and vocational training, special attention should be given to providing the refugees with a basic knowledge of the official language or the most widely spoken language in their country of origin, in order to facilitate their eventual reintegration if they belong to a linguistic minority.
59. Local arrangements for final distribution to the refugees in the camps and to the returnees in the reception/transit centres have been satisfactorily undertaken in both countries by WFP, rather than by UNHCR. As there may be other local situations where WFP has a comparative advantage, consideration should be given to making the MOU clause on final distribution flexible.

