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# GEF Institutional Policies and Engagement





# GEF Institutional Policies and Engagement

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1818 H Street, NW, Washington, DC 20433  
Internet: [www.gefieo.org/](http://www.gefieo.org/); email: [gefevaluation@thegef.org](mailto:gefevaluation@thegef.org)

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*Task Team Leader:* Kate Steingraber, [ksteingraber@thegef.org](mailto:ksteingraber@thegef.org)

*Chief Evaluation Officer:* Geeta Batra

*GEF IEO Director:* Juha Uitto

*Editing:* Karen Holmes

*Layout and design:* Nita Congress

*Cover:* Andrii Yalanskyi/Shutterstock

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# Contents

Foreword .....	vi	<b>4. Stakeholder engagement policy .....</b>	<b>23</b>
Acknowledgments .....	vii	4.1 Background and context .....	23
Abbreviations .....	viii	4.2 Assessment of the adequacy of the 2018 Stakeholder Engagement Policy .....	24
Executive summary .....	ix	4.3 Stakeholder engagement in GEF governance ...	38
<b>1. Introduction: Three policies for greater inclusion.....</b>	<b>1</b>	4.4 Stakeholder engagement in GEF operations ...	42
1.1 Focus of this evaluation .....	1	4.5 Summary .....	52
1.2 Chronology of policy development .....	2	<b>5. Engagement with the GEF-CSO Network... 56</b>	
1.3 Report organization.....	4	5.1 Background and context .....	56
<b>2. Evaluation design.....</b>	<b>6</b>	5.2 Overview of 2016 IEO evaluation .....	58
2.1 Evaluation objective.....	6	5.3 Extent to which recommendations have been taken up .....	59
2.2 Evaluation approach .....	6	5.4 Insights on CSO engagement: a comparator scan ..	69
2.3 Evaluation methods.....	7	5.5 Summary .....	73
<b>3. Policy coherence and strategic alignment ... 11</b>		<b>6. Engagement with indigenous peoples .....</b>	<b>75</b>
3.1 Alignment of the GEF policies with GEF strategies ..	11	6.1 Background and context .....	75
3.2 Strategic relevance of the policies to GEF-8.....	12	6.2 Overview of 2017 IEO evaluation .....	77
3.3 Consistency across the policies .....	14	6.3 Extent to which recommendations have been taken up .....	78
3.4 Reporting on implementation.....	19	6.4 Summary .....	84
3.5 Knowledge sharing and brokering.....	20	<b>7. Environmental and social safeguards .....</b>	<b>86</b>
3.6 Policy implementation during COVID-19 .....	21	7.1 Background and context .....	86
3.7 Summary .....	21		

7.2	Overview of 2017 IEO review and extent to which recommendations were addressed. . . . .	87	4.3	A multistakeholder approach to policy development: the updated Policy on Stakeholder Engagement . . . . .	41
7.3	Review of scope of the 2018 Environmental and Social Safeguards Policy . . . . .	91	4.4	Definition of meaningful consultation in the Stakeholder Engagement Guidelines . . . . .	46
7.4	Safeguard issues for further consideration . . . . .	91	4.5	Civil society-government engagement in Costa Rica . . . . .	49
7.5	Buy-in and support for the policy across the partnership. . . . .	97	4.6	The Amazon watershed in Ecuador . . . . .	53
7.6	Policy compliance . . . . .	98	4.7	Determinants of effective stakeholder engagement practice from an Agency vantage point . . . . .	54
7.7	Monitoring and reporting . . . . .	99	5.1	CSO Network vision, mission, and objectives . . . . .	58
7.8	Summary . . . . .	99	5.2	GEF updated vision to enhance civil society engagement with the GEF . . . . .	59
<b>8</b>	<b>Gender equality policy . . . . .</b>	<b>113</b>	5.3	Engagement of civil society and indigenous peoples organizations in consultations at GEF Council meetings, 2018–20 . . . . .	61
8.1	Background and context . . . . .	113	5.4	Global data Internet usage: trends relevant to the GEF’s engagement strategy . . . . .	68
8.2	Overview of 2017 IEO evaluation . . . . .	116	5.5	Relevant insights about CSO engagement from the literature . . . . .	71
8.3	Extent to which recommendations have been taken up . . . . .	117	6.1	Recognition of traditional indigenous conservation management: ICCAs in the Philippines . . . . .	80
8.4	Adequacy of the 2018 Gender Equality Policy and Guidance . . . . .	120	6.2	Major activities of the IPAG, 2017–20 . . . . .	83
8.5	Buy-in for the gender policy . . . . .	123	7.1	Balancing environment and social risks: how the IDB describes its commitment . . . . .	94
8.6	Summary . . . . .	126	8.1	Gender mainstreaming defined . . . . .	114
<b>Annexes</b>			8.2	GEF 2017 Gender Equality Policy: mandatory requirements . . . . .	115
A	Approach paper . . . . .	129	8.3	GEF-UN LEARN’s gender and environment course . . . . .	122
B	Evaluation matrix. . . . .	149	8.4	Top-of-mind ideas for the GEF Gender Partnership . . . . .	124
C	Policy needs and yields. . . . .	154	<b>Figures</b>		
D	Stakeholder engagement policy theory of change . . . . .	155	4.1	Reported civil society familiarity with the 2018 Policy on Stakeholder Engagement . . . . .	32
E	Interviewees. . . . .	156	4.2	Reported civil society participation in GEF events, 2010–15 and 2016–21 . . . . .	39
<b>References . . . . .</b>			<b>160</b>		
<b>Boxes</b>					
2.1	E-survey distribution and responses. . . . .	9			
3.1	Nature-based solutions: definition and principles	13			
3.2	GEF-8 outcomes to 2030. . . . .	13			
4.1	A more serious approach to documenting engagement with civil society organizations . . . . .	33			
4.2	IW:LEARN: a knowledge-sharing platform for the GEF international waters portfolio . . . . .	37			

4.3	Ratings of GEF engagement with civil society in formulating policies, guidelines, and strategies, 2021	40
4.4	CSO reported ways of learning about engagement opportunities in GEF programs and projects	47
4.5	CSO-reported frequency of interaction with selected actors in the GEF partnership.	47
4.6	Civil society engagement in GEF programs and projects by type of activity, 2016–21	48
4.7	Submission of funding proposal to SGP, 2010–15 and 2016–21	49
4.8	Ratings of GEF engagement with civil society in project design and implementation	50
4.9	GEF operational focal point assessment of the influence of the 2018 Policy on Stakeholder Engagement on particular stakeholder groups	51
5.1	Member agreement on fairness and transparency in the CSO Network’s election processes (%)	64
5.2	Member agreement on access to GEF Council meetings and decisions	64
5.3	Member agreement on in level of awareness and understanding of the GEF	64
5.4	Member assessment of the trend in the health of the CSO Network (n=221)	65
5.5	CSO scales of operation: Network and non-Network	67
5.6	Main areas of work of CSOs: Network and non-Network	67
5.7	CSO access to information and communication technologies in the GEF partnership	69
7.1	Update of GEF environmental and social standards	92
7.2	Environmental and social safeguards frameworks of comparator institutions.	92

## Tables

1.1	Timeline of policies and topics included in this evaluation	3
2.1	Relationship between topics covered in this and previous evaluations	7
2.2	Key informant interviews and focus groups, by stakeholder group	8
2.3	Sample frame and sample sizes of the GEF portfolio, by cohort	10
3.1	Cross-referencing and linkages across the three GEF policies	16
3.2	GEF Agency and GEF Secretariat key roles and responsibilities for the three GEF policies	18
4.1	Stakeholder engagement and consultation: the GEF and comparator organizations	26
4.2	Information disclosure: the GEF and comparator organizations.	27
4.3	Grievance redress mechanisms: the GEF and comparator organizations.	30
4.4	Project cohorts defined for the portfolio review	42
4.5	Search items for the portfolio review on stakeholder engagement	43
4.6	CSO respondent suggestions to reinforce or strengthen GEF engagement with civil society	51
5.1	CSO Network member suggestions to reinforce or strengthen the Network.	66
7.1	Safeguard issue areas for further consideration	101
7.2	Coverage gaps and points of emphasis identified in 2017 IEO review.	104
8.1	Evolution of gender policies at the GEF	114
8.2	2018 Policy on Gender Equality: assessment of alignment	121

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# Foreword

**T**he Evaluation of Institutional Policies and Engagement at the Global Environment Facility (GEF) covers the GEF’s policies on stakeholder engagement (2018), gender equality (2018), and environmental and social safeguards (2019) as well as engagement with the GEF–Civil Society Organization (CSO) Network and the Indigenous People’s Advisory Group. Because these policies were recently updated and thus were in the early days of implementation, the evaluation focused on the relevance of the policies, their coherence as a policy package, and implementation of the Stakeholder Engagement Policy in GEF operations and governance.

This evaluation conducts a first-time in-depth analysis of the Stakeholder Engagement Policy and of stakeholder engagement in the GEF since GEF-6. The evaluation also provides updates to previous evaluations by the Independent Evaluation Office (IEO) on the gender and safeguards policies (carried out in 2017) and revisits two additional evaluations looking at GEF engagement

with the CSO Network (2016), and with indigenous peoples (2017). The evaluation carries out an in-depth analysis of implementation of the policies in GEF-financed activities and identifies outcomes associated with the updated policies.

The analyses for this evaluation contributed to the findings of the GEF IEO’s Seventh Comprehensive Evaluation (OPS7). The evaluation was presented to the GEF Council in June 2021. The Council took note of its conclusions and endorsed its recommendations. Through this report, the GEF IEO intends to share the lessons from the evaluation with a wider audience.



Juha I. Uitto  
Director, GEF Independent Evaluation Office



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Chris Nelson, Manager, Sustainable Development, World Bank Independent Evaluation Group, served as the external reviewer; and Carlo Carugi and Anna Viggh, IEO Senior Evaluation Officers,

provided feedback on the approach paper. Administrative support was provided by Evelyn Chihuguyu, Program Assistant; Marie-Constance Manuella Koukoui, Senior Executive Assistant; and Juan Jose Portillo, Senior Operations Officer. Karen Holmes edited the report, and Nita Congress designed the publication.

The GEF Secretariat, as well as many of the GEF Agencies, provided information, data, and insights during interviews and meetings. Critical information was provided during the country case study work by the GEF focal points; national and local government staff; GEF Agencies; and civil society organizations in Costa Rica, Mozambique, India, and the Philippines.

The GEF IEO is deeply grateful to all these individuals and institutions for their contributions, which were critical to the success of the evaluation. Final responsibility for this report remains firmly with the Office.

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# Abbreviations

ADB	Asian Development Bank	IDB	Inter-American Development Bank
CBD	Convention on Biological Diversity	IEO	Independent Evaluation Office
CEO	Chief Executive Officer	IPAG	Indigenous Peoples Advisory Group
CIF	Climate Investment Funds	NGO	nongovernmental organization
CSO	civil society organization	OFF	operational focal point
EBRD	European Bank for Reconstruction and Development	PFD	project framework document
ECW	Expanded Constituency Workshop	PIF	project identification form
E&S	environmental and social	PIR	project implementation report
ESS	environmental and social safeguards	PPG	project preparation grant
FPIC	free, prior, and informed consent	SGP	Small Grants Programme
GCF	Green Climate Fund	STAR	System for Transparent Allocation of Resources
GEAP	Gender Equality Action Plan	STAP	Scientific and Technical Advisory Panel
GEF	Global Environment Facility	UN	United Nations
GGP	GEF Gender Partnership	UNDP	United Nations Development Programme
ICCA	indigenous and community conserved area	UNEP	United Nations Environment Programme
ICI	Inclusive Conservation Initiative		

The GEF replenishment periods are as follows:

Pilot phase: 1991–94	GEF-1: 1995–98	GEF-2: 1999–2002	GEF-3: 2003–06
GEF-4: 2006–10	GEF-5: 2010–14	GEF-6: 2014–18	GEF-7: 2018–22

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# Executive summary

**T**his mixed-methods evaluation assessed the coherence, operational relevance, and implementation of the policies on stakeholder engagement (2018), gender equality (2018), and environmental and social safeguards (ESS, 2019) of the Global Environment Facility (GEF). It carried out an in-depth analysis of stakeholder engagement since GEF-6, including design and implementation of GEF-financed activities and any outcomes that can be traced to the introduction of the updated policy. The evaluation followed up on previous evaluations associated with the other two policies, both carried out in 2017, and it revisited two additional evaluations looking at the GEF’s engagement with particular stakeholder groups in the GEF partnership and the Civil Society Organization (CSO) Network and among indigenous peoples.

The evaluation posed five key questions:

- To what extent is there strategic alignment and consistency between the Stakeholder Engagement, Gender Equality, and ESS policies?
- To what extent is there buy-in across the partnership and support for implementing these policies?
- To what extent do GEF-supported activities promote inclusive and meaningful stakeholder participation in GEF governance and operations?

- To what extent are the updated policies (Stakeholder Engagement, Gender Equality, and ESS) being applied to new GEF-financed activities and are there any lessons from early implementation of these policies?
- To what extent is there evidence linking stakeholder engagement with project and program impacts?

## FINDINGS

### Policy coherence and strategic alignment

The policies are generally well reflected in the GEF’s vision, strategic priorities, and operational principles, all of which emphasize mobilizing local and global stakeholders, broadening partnerships/alliances, gender mainstreaming, and women’s empowerment. However, explicit linkages to the policies other than the Policy on Gender Equality are often absent.

The GEF-8 strategy document acknowledges the role of its “core policies and delivery modalities to support the GEF’s programme and enlist the full power of the partnership toward transformative results” (GEF 2021, 21). This evaluation concurs with the strategy; GEF policies are far more than just the “how” of the GEF’s work. If positioned

with sufficient intention, the GEF policies can help to translate and mainstream key GEF priorities across all GEF-financed activities and be central in delivering environmental and socioeconomic benefits. Promoting gender equality and empowering local stakeholders to control and defend natural resources could help drive transformational change and strengthen durable outcomes. Resolute application of safeguard requirements assists in mainstreaming considerations of biodiversity, ecosystems, pollution, greenhouse gases, health and safety, labor conditions, sustainable land and water management, and indigenous peoples' rights and management of lands and resources. Further, the analysis and assessment processes required by GEF policies often uncover key institutional weaknesses in policies and regulations, weaknesses that may further exacerbate the drivers of environmental degradation and socioeconomic exclusion.

The three policies are generally consistent in their structure. They each outline mandatory requirements, including for monitoring and reporting. The policy documents are mutually reinforcing to a considerable extent, though there are gaps and missed opportunities to show them as a coherent and strategically relevant policy package.

With the exception of the Policy on Gender Equality, understanding is anecdotal on how the policies contribute to impact across the focal areas, hampering the GEF in being able to draw conclusions between policy implementation and outcomes. Only the Policy on Gender Equality requires that relevant actions and indicators be integrated into the program/project results framework.

The three GEF policies are mutually reinforcing, with a natural overlap in thematic coverage. Effective implementation of each GEF policy relies in part on adherence to provisions of the other two (at least for GEF-financed programs and projects). This complementarity could be made more explicit

across the policies, with further cross-linkages and a potential set of common guiding principles as well as integrated guidance.

### **Assessment of the adequacy of the policy on stakeholder engagement**

The way the GEF defines stakeholder engagement and sets out policy requirements is mostly consistent with the practices of comparator institutions.<sup>1</sup> Overall, GEF Agencies describe the updated policy as well designed—that is, clear in meaning and intent, and with requirements that are realistic and appropriate.

GEF reporting guidelines for Agencies are mostly described as clear, generally compatible with own practices, useful, and not onerous. Agencies newer to more complex social/environmental programming are more likely to seek additional guidance in the partnership. The portal is mostly described as “getting better” though with limitations remaining.

Uniformly, Agencies assess the one-to-one support provided by the Secretariat as very satisfactory—attentive and substantive. Policy-related support provided through training/orientation is described as adequate though not developed to provide deeper, role-specific understanding of policy implementation. Some Agencies have stakeholder engagement expertise to share, while others seek it. In this mix, the GEF is seen as well placed to be an information and relationship broker.

Constraints in implementation are noted by the Agencies in three areas, mainly: internal (Agency/project team) experience/capacity to integrate “meaningful” stakeholder engagement into design and implementation; inadequacy of budget and time to undertake quality stakeholder engagement;

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<sup>1</sup> Comparator institutions referenced in the evaluation are the Green Climate Fund, the Adaptation Fund, the World Bank, the Inter-American Development Bank, and the United Nations Development Programme.

and the prevailing social/political context in some countries.

There is uncertainty among a significant proportion of operational focal points (OFPs) as to what is expected of them in supporting any of the three policies, including the one on stakeholder engagement. Less than a quarter of those surveyed said they were familiar and using the policy regularly.

Familiarity with the updated policy is also mixed across the vast array of GEF-affiliated CSOs. The majority of those surveyed indicate “some” familiarity, and CSO Network members are more inclined than their non-Network peers to know the policy.

### **Stakeholder engagement in GEF governance**

The updated Stakeholder Engagement Policy sets out mandatory requirements for stakeholder engagement activities led by the Secretariat. This encompasses the activities under the Country Support Program, evaluated separately. Also covered are activities required of the Secretariat for stakeholder engagement in the development of policies, guidelines, and strategy. The 2017 approval of the GEF’s Updated Vision to Enhance Engagement with Civil Society provides additional specificity to the policy requirements. Taken together, the policy and the Updated Vision have given the Secretariat a more proactive stance as a facilitator of stakeholder engagement on governance matters. Views are mixed on the merits of this change.

Patterns of civil society participation in GEF governance have not changed very much over a 10-year period, according to two surveys of CSOs (2016, 2021). Consistently, CSO Network members show a greater likelihood of participation in GEF events than those not identifying with the Network. The margins for CSO Network and non-Network CSO participation in the Council are narrower in 2020 reflecting, perhaps, the decision to sponsor

non-Network members to Council meetings. Ratings by CSOs of the GEF’s performance engaging civil society in governance are mostly distributed across the “fair” and “good” categories on a three-point scale, with no discernible pattern of change indicated over the past five years.

The view from inside the GEF Secretariat is that engagement in the development of policies, strategies, and guidance has varied on a case-by-case basis and that, to date, there has been no standard engagement practice in place for the GEF. The means by which the policy updates for stakeholder engagement and gender equality were formulated during GEF-6 are described by the GEF Secretariat as the most prominent examples of the application of a multistakeholder approach.

### **Stakeholder engagement in GEF operations**

Examination of the GEF program and project portfolio back to 2014 shows evidence of adherence to the requirements of the updated policy and greater attention to stakeholder engagement practice in GEF-funded programs and projects, though gaps remain. Policy requirements cover the full project cycle but are front loaded to CEO endorsement.

CSOs surveyed showed that they are more likely to obtain information about engagement opportunities from their peer organizations and networks or through GEF-mediated events (e.g., expanded constituency workshops) than they are from Agencies or governments. For most, interactions with Agencies and governments (OFPs) are seldom (every six months or less), if at all.

Patterns of interaction between the GEF Secretariat, Agencies, and OFPs have not changed appreciably over the past 10 years (2021, 2016 surveys). About half of CSO respondents have been consulted and engagement has mostly occurred in the opening stages of the project cycle. Not surprisingly, the vast majority of CSOs (Network and

non-Network) engage with the GEF through the Small Grants Programme.

As with engagement on GEF governance matters, most CSOs rate GEF's stakeholder engagement in programs and projects in the "fair" and "good" categories on a three-point scale, with no discernible pattern of change indicated over the past five years. On inclusion of women's groups, indigenous peoples, and civil society, most CSOs rate the GEF as "partly" or "very" inclusive in equal measure. Perceptions of GEF performance with respect to the private sector indicate less inclusion and also a lesser degree of knowledge about private sector involvement in the GEF.

### Signals of policy impact

Agency key informants, in most instances clear champions of stakeholder engagement, describe an internal "nudging effect" from the introduction of the updated policy. It has provided impetus to review and revise their own policies and to deepen the thinking across staff on the practice itself. Having a stronger policy has also helped the new GEF Agencies to leverage decision makers in implementing bodies and with governments to go beyond (lesser) conventional practices and/or national standards.

The evaluation has also collected stories of robust stakeholder engagement though, as shown in the portfolio review, the documentation of impact is limited and done mostly at a project/program level without adhering to a common frame of reference.

## FOLLOW-UP TO PREVIOUS EVALUATIONS/REVIEWS

### Evaluation of Gender Mainstreaming in the GEF

In 2017, the GEF IEO's evaluation on gender mainstreaming made the following recommendations:

- Consider a revision of its policy to better align with best practice standards;
- Develop an action plan for the implementation of the Gender Policy in GEF-7; and
- Ensure adequate resources are available.

The Gender Equality Policy and actions to support its implementation reflect all three recommendations. The updated policy reflects overall alignment with international best practice and moves the GEF decidedly from a gender-aware, "do no harm" approach to a gender-responsive, "do good" approach.

Gender policy guidance and action plans were released and approved as the policy came into effect (July 2018). A Gender Implementation Strategy (June 2018) situated the content of the policy in a broader understanding of gender gaps, particularly those pertinent to the GEF-7 program, and identified "entry points" within the program to promote gender equality and women's empowerment.

Since 2018, the GEF has augmented its in-house capacity to deliver on the policy—the GEF's senior gender specialist (hired in 2016) is assisted by other trained staff to support gender work. Policy-related orientations and trainings in the partnership are generally well received, though these sessions remain at a general level.

The United Nations CC:LEARN Open Online Course on Gender and Environment—a collaboration between the GEF, the United Nations Development Programme the Small Grants Programme, and the United Nations Institute for Training and Research—stands out as the GEF's only online training to support the policies covered by this evaluation. Moderated by the Secretariat, the GEF Gender Partnership has emerged as a strong knowledge sharing, knowledge exchange, and capacity development forum among GEF Agencies and gender focal points in the conventions that the GEF serves. The replicability potential of the GEF

Gender Partnership model across other policies is considerable according to those familiar with it.

Portfolio documents show increased attention to gender equality with the introduction of the updated policy—more stakeholder consultations involving individuals or groups with a gender perspective; more frequent use of a gender analysis methodology and formulation of a gender action plan; higher utilization of the combination of sex-disaggregated and gender-specific indicators; increased reporting on gender in project implementation reports (PIRs); and greater prevalence of resource allocations to support gender training and knowledge management.

Gaps in alignment with best practices are observed by Agency key informants in the following areas: definition of the role of the gender focal points, assignment of budget resources at the corporate level to support the policy, and tracking of financial data as a way to assess commitment to the policy.

Observed constraints in implementation include: uneven patterns of gender data collection across the Agencies, thereby constraining analysis; internal agency-level challenges bringing staff on side with gender equality concepts; and country-level factors militating against recognition of gender equality as an important factor bearing on the global environment.

### **Review of GEF Policy on Agency Minimum Standards on Environmental and Social Safeguards**

In 2017 the GEF IEO undertook its original review of the Environmental and Social Safeguards policy. The review contained three overarching recommendations:

- Review the 2011 GEF Minimum Standards on Environmental and Social Safeguards;
- Improve safeguards monitoring and reporting; and

- Support capacity development, expert convening, and communications on safeguards.

The GEF responded to IEO's recommendations from the 2017 Safeguards Review by updating the GEF ESS Policy, incorporating most of the identified gap areas. The updated policy has served as a catalyst for strengthening the safeguard frameworks of a number of GEF Agencies. However, some safeguard issues could be further strengthened.

The updated ESS Policy improved safeguards reporting and monitoring in line with the 2017 IEO recommendations, requiring Agencies to provide information at project midterm and project completion. However, unlike the Policy on Gender Equality and the Policy on Stakeholder Engagement, the ESS policy does not require safeguards reporting in PIRs, a misalignment. Nevertheless, it appears some Agencies are including some safeguards information in PIRs. The policy also increased portfolio-level reporting on safeguard risks and grievance cases, again in line with the 2017 IEO recommendations.

The GEF has not moved forward on the IEO recommendation to support capacity development, expert convening, and communications on safeguards in the GEF partnership. Input from GEF Agencies and OFPs indicate significant interest in the GEF expanding its knowledge brokering role on challenging safeguard-related issues.

The updated ESS policy incorporated a wide-range of "new" thematic areas, such as labor and working conditions; community health, safety, and security; climate change and disaster risks; disability inclusion; disadvantaged or vulnerable individuals or groups; and adverse gender-related impacts, including gender-based violence and sexual exploitation and abuse. Nevertheless, some recommended areas from the 2017 review were not or were only partially included in the update.

In addition, further reviews and recently updated Agency safeguard frameworks highlight potential areas where the GEF ESS could eventually be further strengthened. These areas include fragility and conflict issues, more explicit alignment with human rights frameworks, and a range of specific issues areas (see section 8). However, some Agencies are still completing their action plans for ensuring compliance with the updated GEF ESS and interviewees indicated no desire for a change in the ESS policy anytime soon.

The highlighting of safeguard-related risks and impacts across the portfolio, as well as heightened attention to grievance cases, may help drive greater attention to safeguard issues during project implementation. However, as the ESS Policy only went into effect in July 2019, it is too early to tell.

## Evaluation of the GEF-CSO Network

The 2016 Evaluation of the GEF CSO Network was requested at the GEF Council's 47th meeting in October 2014. The evaluation recommended that:

- A contemporary vision for the Network be created, including a modality to finance Network activities;
- Clear rules of engagement be developed to guide cooperation and communication;
- The Network continue to build itself as a mechanism for strengthening civil society participation in the GEF; and
- The Network strengthen its governance.

There is limited progress across the recommendations. As mentioned earlier, an updated vision document was developed and approved (2017). It took into its perspective all GEF-involved CSOs (not just the Network) and assigned the Secretariat with lead responsibilities regarding representation and consultation functions. Today, there is divided opinion on the merits of these changes.

On one side, the changes under the Updated Vision are thought to have led to more diverse CSO involvement in GEF governance (a better blending of Council-experienced and new focal area-experienced CSOs), and more focused conversations. On the other side, those changes are thought to have undermined the Network's role as the voice and coordinating body for GEF-affiliated CSOs.

In the end, the recommended deliberation over a "modality to finance Network activities" was not included in the visioning exercise and, on this aspect, no progress has been subsequently made. Attempts to demonstrate the Network's value proposition inside or outside the partnership have yet to yield financial support. Today, the working relationship between CSO Network and the Secretariat is intact but strained, mostly over role delineation.

The CSO Network's efforts to build itself up as a mechanism for strengthening civil society participation in the GEF—a skills-building strategy, a country-contact concept to help connect regional focal points with the country CSOs and other GEF partners, and member recruitment—are hampered by internal tensions and financial constraints. There has been no functional website since 2017 and no member newsletter.

The Network's efforts to strengthen governance mechanisms have produced mixed results. Early work was done right after the evaluation to address the Network's complaints process, realign constituencies, and separate the secretariat function from Network leadership roles. The Network's strategic plan was updated and focal area working groups were created. But today, there are signals that current members are not renewing and new members are not joining. The Coordinating Committee is at half-strength or less with internal tensions and vacant positions; its working groups are mostly inactive.



Under the Updated Vision, the Secretariat's Partnership Team is engaging the larger field of CSOs that are mostly connected to the Small Grants Programme. The team maintains a CSO landing page on the GEF website that clarifies opportunities for CSO involvement. It is also developing learning events. The COVID-19 pandemic is causing the GEF to accelerate the development of online strategies to engage CSOs and other partners at the country and regional levels through the Country Support Program.

According to the 2021 CSO survey carried out for this evaluation, the majority of CSO Network members continue to see in the CSO Network a structure that enables effective and efficient sharing of information, where all major stakeholder groups are fairly represented, with election processes that are fair and transparent. Nonetheless, the survey also shows a marked decline since 2016 in assessed member benefit on six aspects of membership.

### Evaluation of GEF Engagement with Indigenous Peoples

The GEF IEO undertook an evaluation of GEF engagement with indigenous peoples in 2017 as part of its Sixth Overall Performance Study (OPS6). The evaluation contained five recommendations:

- Establish and strengthen dedicated funding opportunities for indigenous peoples' projects/organizations;
- Update relevant policies and guidelines to reflect best practice standards concerning indigenous peoples, including a rights-based approach to engagement;
- Review the Indigenous Peoples Advisory Group's (IPAG's) role for operational constraints;
- Facilitate dialogue between indigenous peoples and local communities and GEF government focal points; and

- Monitor application of the ESS Indigenous Peoples Minimum Standard and the Indigenous Peoples portfolio.

There has been good progress across the recommendations. Regarding the first, the Inclusive Conservation Initiative is roundly welcomed as a breakthrough funding initiative designed for local impact, GEF-wide learning, and scale out/up. The initiative is seen as precedent setting—that is, complementary to but larger in project scale than the Small Grants Programme, dedicated to creating projects designed and implemented by indigenous people in biodiversity hotspots. Other parts of indigenous peoples' programming are developing at a modest pace.

Indigenous leaders are generally favorable toward the revised ESS Policy and Guidelines. The policy is considered contemporary and appropriate for the partnership. The accompanying guidelines are described as "general" and in need of elaboration with case examples. With its portfolio spread across key convention areas and its reach through multiple delivery channels, the GEF is considered uniquely suited to "mainstream" engagement and safeguard policies.

Agencies are seen as an important driver/intermediary in the bid to ensure that country governments recognize and engage indigenous peoples. Observations on performance in this regard are mixed. At worst, "exclusion by design" is observed, as are underwhelming applications of free, prior, and informed consent (FPIC). At the other end of the continuum, indigenous peoples are authentically engaged in partnerships with sharing and two-way learning.

The IPAG is operationally stable and strong—that is, strategically focused, with a dedicated and connected membership. By all accounts, it is well supported by the GEF Secretariat administratively and with high-level advocacy. The IPAG has

earned credibility among those who know it, though its value proposition is not widely known within or beyond the partnership.

A tightly focused mandate, the size and dispersion of the group, its profile, its (part) volunteer make-up, and resource availability all place constraints on what the IPAG can do. The volunteer ethos of the IPAG is valued but insufficiently addressed in the delineation of roles in the IPAG between the advisors and the indigenous members, and reckoning of the time and cost burden on those who are not supported by any institution to participate.

Progress is evident in the monitoring of the ESS indigenous peoples Minimum Standard and the indigenous peoples' portfolio. While Agency reporting on safeguards is now a requirement and tagging of indigenous peoples-related projects has improved, indigenous peoples' leaders suggest that it is too soon to see a systemic improvement. A renewed commitment to indicator development is warranted in this regard.

## MAIN CONCLUSIONS

### Policy performance

In the main, the three GEF policies align with relevant global strategies—including the Sustainable Development Goals/Agenda 2030, GEF 2020, and GEF-7 programming directions—and are relatively contemporary in formulation with like policies of peer institutions. However, some gaps exist.

Cross referencing is evident to a certain extent across the three policies but with gaps that underplay the complementarities among them. Typically, it is in the operationalization of the policies where task separation is most apparent across the partnership.

Three key factors militate against optimal policy implementation: (1) human resources capacity/availability to design and deliver activities under the policy requirements; (2) time and budget limitations during the identification and design phases of the project cycle; and (3) cautionary stances by some governments toward inclusion of certain stakeholder groups in the program/project cycle.

The introduction of mandatory requirements for monitoring and reporting position the GEF better than before to demonstrate policy impact. Up to this point, however, reporting on the updated policies has provided more insight on compliance, risk (safeguards), and anticipated results than it has on actual contributions toward program/project outcomes and high-level program priorities. Additional monitoring and reporting commitments are required in the partnership for the GEF to show policy effectiveness and support learning on inclusion. The task begins at the project level with a systematic collection of policy-related data to guide inclusion practices and to communicate persuasively on inclusion matters at multiple levels.

### Stakeholder inclusion

The GEF's long-standing commitment to engage stakeholders and civil society in GEF policies, strategies, programs, and projects has been reinforced with the updated policies and the 2017 Updated CSO Vision. Yet, at the program and project level, the policies could place an even stronger emphasis on inclusion, particularly regarding disadvantaged and vulnerable groups.

The position of the GEF CSO Network within the GEF partnership has weakened over the past four years. The Updated Vision represented an opportunity to redefine roles and strategies. However, efforts to build the Network as a mechanism for strengthening civil society participation in the GEF and to further develop its own governance are stalled. The Network is presently caught in

a vicious cycle; it has not demonstrated its value proposition in a way that attracts donor resources, and without those resources it is hard pressed to generate value for its members and GEF partners.

Incremental gains have been made in the GEF's engagement with indigenous peoples. Strengthened safeguards provide additional protections regarding lands as well as natural and cultural resources, though country contextual factors continue to bear heavily on policy implementation. Dedicated project financing, while enhanced with a precedent setting pilot, remains modest and outside of the STAR (System for Transparent Allocation of Resources) allocation. Breakthroughs toward a wider and deeper engagement, on both counts, depend on strategic demonstration of impact and effective practice.

The IPAG has gained credibility as a knowledge resource among those in the GEF who know it. Increasing opportunities for this body to extend its impact, even just within the GEF, are constrained by the size of the group, its low profile, its volunteer make-up, and the resources available to it. With policy enhancements and a growing strategic orientation toward inclusion, there is scope to enhance its contribution to the partnership.

### **Strategic relevance of the policies to GEF-8**

With a deepening in its holistic, systems orientation to program design and a felt urgency to "rebalance the relationship between people and nature," the GEF is entering its eighth replenishment signaling the importance of "inclusion" and the potential for the three policies to be instrumental with their contribution to the GEF-8 strategy. The intention is to

strengthen the Stakeholder Engagement, Gender Equality, and ESS policies, not by any substantive change to their requirements, but by highlighting their strategic relevance to the GEF.

## **RECOMMENDATIONS**

### **Policy coherence and strategic positioning**

1. The Secretariat should prepare an overarching narrative for the three policies under the banner of "inclusion," making explicit the complementarities across the policies, their contribution to the GEF program, and their tie-in to the GEF project cycle. As the policies progress through implementation, the Secretariat should build capability to track inclusion at a project level in a way that allows the GEF to analyze policy impact at a portfolio level.

### **Partnership enabling**

2. The Secretariat should develop a knowledge-sharing effort that leverages expertise within the partnership to highlight approaches for addressing safeguards implementation issues related to the updated ESS policy. Related to the IEO's evaluation on knowledge management, the Secretariat should incorporate inclusion practice content and ESS implementation topics within the scope of the Secretariat's forthcoming knowledge management strategy.
3. The Secretariat should reset the GEF's relationship with the CSO Network with clarity on roles and responsibilities, and recalibrate the IPAG mechanism for increased strategic impact. In both instances, the Secretariat should draw upon the growing body of knowledge on civil society outreach practices, the opportunities inherent in the policies to promote inclusion, and the strategic directions indicated for GEF-8.



# Introduction: Three policies for greater inclusion

Since its inception, the Global Environment Facility (GEF) has been explicit about the importance of involving stakeholders, initially described as “the public,” in GEF-financed interventions. This is stated in the original GEF Instrument and reflected in a series of policies, guidance, and strategies that have evolved over time to ensure that GEF Agencies are applying a uniform approach inclusive of a diverse set of stakeholders across the GEF partnership.

The initial focus of engagement centered on information disclosure, and consultation and participation around GEF-financed activities. Since then, the approach has evolved from a singular focus on risk mitigation, i.e., a “do no harm” stance, to one that also references inclusion and participation in recognition that involving stakeholders can also lead to better development results, i.e., “do good.”

## 1.1 Focus of this evaluation

This evaluation centers on three policies at the GEF—the Stakeholder Engagement Policy, the Gender Equality Policy, and the Policy on Environmental and Social Safeguards. The common thread between these policies is that they address the

“people part” of the human-environment nexus commonly referenced at the GEF and in the broader development community.

The underlying issues addressed by these policies—empowerment of women, inclusivity and stakeholder engagement, and safeguarding against negative environmental and social outcomes—have received increasing attention over the past decade within the GEF. Aiming to ensure engagement, inclusion, and avoidance of harm to people and the environment, these policies set forth: (1) minimum standards for GEF Agencies, requiring that they demonstrate the necessary policies, procedures, systems, and capacity to meet these standards, and (2) minimum requirements for all GEF-financed activities.

The evaluation assesses the coherence, operational relevance, and implementation of the three policies. Where evaluative evidence is available, the evaluation builds on existing GEF Independent Evaluation Office (IEO) work. This is the case for the Gender Equality Policy and the Environmental and Social Safeguards Policy, and with analysis of the GEF’s engagement with indigenous peoples and support to the GEF Civil Society Organization (CSO) Network.

Including three policies in one evaluation provided an opportunity to assess the coherence of the three policies, both the consistency among them and their alignment with GEF strategy. The analysis of the Stakeholder Engagement Policy includes an analysis on the effectiveness and impact of the policy to the extent possible, understanding that the policies only came into force in July 2018.

## 1.2 Chronology of policy development

The GEF relies on engagement and interaction among its stakeholders to deliver global environmental benefits. Its policies, guidelines, and strategies have evolved over time to support, encourage, and in some cases mandate engagement with stakeholders across the partnership. The current definition of a “stakeholder” from the GEF Stakeholder Engagement Policy is “an individual or group that has an interest in the outcome of a GEF-financed activity or is likely to be affected by it, such as local communities, Indigenous Peoples, CSOs, and private sector entities, comprising women, men, girls and boys”<sup>1</sup> (GEF 2017a, 7). This definition includes the stakeholders outside the partnership, but equally relevant are the internal stakeholders at the GEF: Council, Secretariat, Scientific and Technical Advisory Panel (STAP), IEO, international environmental convention staff, operational and convention focal points, the CSO Network, and the Indigenous Peoples Advisory Group.

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<sup>1</sup>This is the definition from the 2017 Stakeholder Engagement Policy. The 2018 guidelines expand upon this definition, adding: “They can include, among others, relevant ministries, local governments, and locally-affected people, national and local NGOs, community-based organizations (CBOs), indigenous peoples organizations, women’s groups, private sector companies, farmers, and research institutions, and all major groups identified, for example, in Agenda 21 of the 1992 Rio Earth Summit and many times again since then.”

The first mention of engagement with stakeholders is found in the GEF Instrument, which states that “GEF Operational Policies...shall provide for full disclosure of all non-confidential information, and consultation with, and participation as appropriate of, major groups and local communities through the project cycle” (GEF 2019b, 8).

The first policy that addresses engagement was the Public Involvement Policy (GEF 1996), approved by the GEF Council in 1996 at the 7th Council Meeting. The policy included a rationale for public involvement, describing it as critical to the success of GEF-financed projects.<sup>2</sup> The policy mentions both women and indigenous peoples (as disadvantaged populations) as part of its definition of stakeholder participation. The Public Involvement Policy remained in place for almost 20 years before being subject to a formal review in 2014. Between then and now, policies and guidance for safeguards, gender, information disclosure, monitoring and evaluation, and other topics have built on this foundational document. Developments are summarized in [table 1.1](#).

As the GEF partnership expanded in 2010, there was a need to ensure that all GEF Agencies were consistent in their policies and approaches for GEF-financed activities, including, inter alia, measures for safeguarding against environmental and social risks, and ensuring adequate attention to gender and sufficient stakeholder engagement. This led to the issuance of policies, guidance, and strategies as described below, presented in chronological order.

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<sup>2</sup> According to the policy rationale, this was to occur through four mechanisms: enhancing country ownership of and accountability for project outcomes; addressing social and economic needs of affected people; building partnerships among project executing agencies and stakeholders; and making use of local skills, experience, and knowledge.

**Table 1.1** Timeline of policies and topics included in this evaluation

1996	Public Involvement Policy
2010	Expansion of the GEF Partnership
2011	Policy on Gender Mainstreaming
	Agency Minimum Standards on Environmental and Social Safeguards
2012	Principles and Guidance for Indigenous Peoples
2014	GEF 2020 Strategy
	Gender Equality Action Plan
	Guidelines for the Implementation of the Public Involvement Policy
2017	Stakeholder Engagement Policy
	Policy on Gender Equality
2018	Stakeholder Engagement Guidelines
	Gender Strategy
	Gender Equality Action Plan
2019	Policy on Environmental and Social Safeguards
	Guidelines on Environmental and Social Safeguards

Source: GEF IEO compilation.

Both the Policy on Gender Mainstreaming (GEF 2012a) and the GEF Policy on Agency Minimum Standards on Environmental and Social Safeguards (GEF 2011a) were approved in 2011, at the 40th and 41st Council Meetings, respectively. The Gender Mainstreaming Policy was initially adopted as an annex to a document entitled “GEF Policies on Environmental and Social Safeguards Standards and Gender Mainstreaming” (GEF 2011b) but was later issued as a stand-alone policy.

The provisions for the GEF Minimum Standards were established in the guideline Application of Policy on Agency Minimum Standards on Environmental and Social Safeguards. The GEF Minimum Standards had the objective of preventing and mitigating any unintended negative impacts to people and the environment that might arise through GEF operations. According to the policy, the new minimum standards used the approach and criteria contained in the World Bank’s safeguards policy as

a starting point.<sup>3</sup> It also builds on the GEF’s Public Involvement Policy. There were seven GEF Safeguard Standards approved in 2011: Environmental and Social Assessments; Natural Habitats; Involuntary Resettlement; Indigenous Peoples; Pest Management; Physical Cultural Resources; and Safety of Dams.

The Gender Equality Action Plan (GEAP; GEF 2014a) was approved at the 47th GEF Council in October 2014. The GEAP covered the fiscal year period 2015–18 and aimed to operationalize the Policy on Gender Mainstreaming, including a workplan with concrete steps and key actions and outputs addressing five key elements: project cycle; programming and policies; knowledge management; results-based management; and capacity development. To implement activities under the GEAP, the GEF Gender Partnership was established. It remains active today. The GEAP called for a review and, as necessary, an update of the Policy on Gender Mainstreaming by July 2018.

After the 1996 Public Involvement Policy was issued, 18 years passed before the corresponding guidelines were issued. In 2013–14 the GEF-CSO Network conducted a review of the Public Involvement Policy and issued a report to the Council (GEF-CSO Network 2014). In addition, the IEO conducted a substudy on CSO engagement in the GEF as part of OPS5 (GEF IEO 2013a). Recommendations from both documents are reflected in the Guidelines for the Implementation of the Public Involvement Policy (GEF 2014b) approved at 47th Council Meeting in October 2014. The guidelines detail steps to achieve and implement the principles stipulated in the policy. They reference the Fourth High-Level Forum on Aid Effectiveness in Busan, highlighting the importance of country ownership for GEF-financed projects.

<sup>3</sup> Operational Policy 4.00: Piloting the Use of Borrower Systems to Address Environmental and Social Safeguard Issues in Bank Supported Projects

At the level of GEF strategy, stakeholder engagement features prominently. In the GEF 2020 Strategy, “mobilizing local and global stakeholders” is a core operational principle (GEF 2015). The strategy describes roles and responsibilities for national and local governments, the private sector, and civil society stakeholders and highlights cross country partnerships and dialogue processes as critical processes. There is an emphasis on stronger engagement with CSOs and indigenous peoples to develop knowledge and mobilize public action leading to increased effectiveness of GEF-financed activities. Gender mainstreaming and women’s empowerment are also highlighted.

In 2017, the GEF Policy on Stakeholder Engagement (GEF 2017a) was approved, coming into effect on July 1, 2018, for new GEF-financed activities. It supersedes the Public Involvement Policy and advances stakeholder engagement requirements. These are described under the Stakeholder Engagement Policy ([chapter 4](#)). Corresponding Guidelines on the Implementation of the Policy on Stakeholder Engagement were issued in December 2018 (GEF 2018a).

In parallel with the Stakeholder Engagement Policy, an updated gender policy was approved in late 2017. The Policy on Gender Equality (GEF 2017b) superseded the Policy on Gender Mainstreaming and was approved by the 53rd GEF Council in November 2017. The policy came into effect for new activities on July 1, 2018. The updated policy marks a shift for GEF from a risk mitigation approach to a proactive, gender-responsive approach. Changes to the policy are described in [chapter 8](#). The Gender Implementation Strategy (GEF 2018b) was approved at the following Council Meeting in June 2018. The strategy addresses identified inequalities and gaps to be addressed under the GEF-7 program.

The 55th GEF Council approved an updated Policy on Environmental and Social Safeguards (GEF

2018c) in December 2018. The policy came into effect for new activities on July 1, 2019, while for ongoing activities the policy became effective on July 1, 2020. The updated policy focuses on minimum standards for Agency policies, procedures, systems, and capabilities, and outlines a process for monitoring compliance. Among other advances, the updated policy strengthens protections for indigenous peoples. As such, it reflects specific recommendations from the IEO Review of GEF Policy on Agency Minimum Standards on Environment and Social Safeguards (GEF IEO 2018a), and from the IEO Evaluation of GEF Engagement with Indigenous Peoples (GEF IEO 2018b). Guidelines for the Policy on Environmental and Social Safeguards (GEF 2019a) were presented as an information document to the Council in December 2019. Changes to the policy are described in [chapter 7](#).

The updated policy focuses on minimum standards for Agency policies, procedures, systems, and capabilities, and outlines a process for monitoring compliance. The policy sets out minimum standards in nine areas, including: labor and working conditions; community health, safety, and security; climate and disaster risks; disability inclusion; disadvantaged or vulnerable individuals and groups; and adverse gender-related impacts, including gender-based violence and sexual exploitation and abuse. The policy strengthens protections for indigenous peoples, requiring Agencies to ensure that free, prior, and informed consent (FPIC) of affected indigenous peoples is obtained under certain conditions. It also adds new requirements for documenting and reporting on environmental and social risks and potential impacts and their management, and sets out roles and responsibilities for Agencies and the Secretariat.

### 1.3 Report organization

This chapter provides an introduction to the three policies that are the subject matter for this



evaluation, tracing their evolution in the GEF since inception. An overview of the evaluation design follows in [chapter 2](#). [Chapter 3](#) examines coherence across the policies and their strategic alignment; [section 3.2](#) situates the evaluation of these three policies in the context of the GEF's current replenishment discussions.

[Chapter 4](#) examines the updated policy on Stakeholder Engagement. Of the three policies, this one is singled out for particular attention given the length of time that has passed since public involvement practice at the GEF was last examined in an evaluative sense. Chapters [5](#) and [6](#) follow up on recent evaluations of two key groups of stakeholders. [Chapter 5](#) concerns the GEF-CSO Network, while [chapter 6](#) addresses the GEF's engagement

with indigenous peoples (2017). [Chapter 7](#) provides an update on the 2018 review of the GEF's minimum standards on environmental and social safeguards. And to close, [chapter 8](#) follows up on the 2018 evaluation of the GEF's gender mainstreaming policy.

The follow-up studies examine progress on the recommendations made in each evaluation. Each chapter includes background information and sections that organize the findings by the key areas of inquiry that are spelled out in the evaluation matrix (see [chapter 2](#) and [annex B](#)).

# Evaluation design

## 2.1 Evaluation objective

The objective of the evaluation is to assess the coherence, operational relevance, and implementation of the following GEF policies: Stakeholder Engagement Policy, Gender Equality Policy, and Policy on Environmental and Social Safeguards. The evaluation includes an in-depth analysis of stakeholder engagement at the GEF since GEF-6. The analysis of stakeholder engagement examines changes over time in GEF-financed activities, as well as any evidence on outcomes associated with stakeholder engagement.

The evaluation addresses the following questions:

- To what extent is there strategic alignment and consistency between the Stakeholder Engagement, Gender Equality, and Safeguards policies?
- To what extent is there buy-in across the partnership and support for implementing these policies?
- To what extent do GEF-supported activities promote inclusive and meaningful stakeholder participation in GEF governance and operations?
- To what extent are the updated policies (Stakeholder Engagement, Gender Equality, and

Safeguards) being applied to new GEF-financed activities and are there any lessons from early implementation of these policies?

- To what extent is there evidence linking stakeholder engagement with project and program impacts?

## 2.2 Evaluation approach

The mandate covers five different topic areas: (1) Stakeholder Engagement Policy; (2) Gender Equality Policy; (3) Environmental and Social Safeguards Policy; (4) engagement with indigenous peoples and local communities; and (5) engagement with civil society. As shown in [table 2.1](#), the study builds on a substantial body of previous evaluative work from IEO evaluations carried out in the last five years for topics 2–5. This is the first time there has been any evaluation of the GEF’s Stakeholder Engagement Policy, and consequently that topic is covered in greater depth.

The evaluation team used a mixed methods approach that included: document and literature review, benchmarking analysis, key informant interviews, online surveys, case studies, and a portfolio review. Early on, the team carried out a

**Table 2.1** Relationship between topics covered in this and previous evaluations

Topic	Previous evaluation
Stakeholder Engagement Policy	Not applicable
Gender Equality Policy	<a href="#">Evaluation of Gender Mainstreaming in the GEF (2017)</a>
Environmental and Social Safeguards Policy	<a href="#">Review of the GEF Policy on Agency Minimum Standards on Environmental and Social Safeguards (2017)</a>
Engagement with indigenous peoples and local communities	<a href="#">Evaluation of GEF Engagement with Indigenous Peoples (2017)</a>
Engagement with civil society	<a href="#">Evaluation of the GEF-Civil Society Organization Network (2016)</a>

**Note:** For the Gender Equality and Environmental and Social Safeguards policies, previous evaluations focused on the precursor policies that came before the current revised policies (for example, the Gender Mainstreaming Policy).

systems analysis to understand the actors and relationships within the partnership regarding the three policies. They also drafted and validated an unofficial theory of change to explore plausible causality associated with the Policy on Stakeholder Engagement. Both exploratory exercises were helpful in the development of an evaluation matrix that elaborated upon the evaluation questions above and informed the design of data collection tools. The evaluation approach paper is set out in [annex A](#) and the evaluation matrix in [annex B](#).

## 2.3 Evaluation methods

Data collection and analysis activities took place between July 2020 and March 2021. These are summarized below.

### STAKEHOLDER NEEDS/YIELDS EXERCISE AND VALIDATION

The GEF partnership is a complex entity, comprised of 183 countries, 18 Agencies, CSOs, indigenous peoples, and the private sector. The evaluation conducted a stakeholder mapping exercise, which looked at the needs/yields for each actor relative to the implementation of the policies ([annex C](#)). This was triangulated with the GEF Secretariat and used as a reference for interviews with stakeholders. The

tool was also used to refine and hone survey and interview questions.

### THEORY OF CHANGE EXERCISE

Using the Stakeholder Engagement Policy, the evaluation constructed a theory of change ([annex D](#)), mapping out the activities, outcomes, and impact as described in the policy documents. This was validated in a meeting with the GEF Secretariat and was used to frame evaluation sub-questions and inform instrument design.

### DESK REVIEWS

The evaluation team conducted desk reviews of all three GEF policies, the associated guidance, guidelines, and strategies as well as similar documents from comparator institutions for a benchmarking exercise for each policy. Program/project documents—especially at the project identification form (PIF)/project framework document (PFD) approval and Chief Executive Officer (CEO) endorsement phases—terminal evaluation reports, and document templates were reviewed, and the Implementation Modules in the GEF Portal were sourced for monitoring and reporting data. Documentation related to the GEF-CSO Network and the Indigenous Peoples Advisory Group was reviewed. This included Council documents pertaining to CSO and/

or indigenous peoples' engagement, and GEF-CSO Network and Indigenous Peoples Advisory Group documents addressing programming and governance aspects of the two bodies. The team carried out a literature scan of CSO engagement practices in financing environments analogous to the GEF's.

## KEY INFORMANT INTERVIEWS

[Table 2.2](#) shows the breakdown of interviews by stakeholder group. A full list of key informants is included in [annex E](#).

## ONLINE SURVEYS

[Box 2.1](#) shows the distribution and response rates for two online surveys carried out using the Survey Monkey online survey platform.

## COUNTRY CASE STUDIES

In-country consultants carried out interviews with a range of stakeholders in Costa Rica and Mozambique. The studies captured the current situation of the GEF partnership set within a county context and working with the three policies. The

consultants were given a set of questions derived from the evaluation matrix. In each country, consultants interviewed: ministry officials engaged as country focal points or as actors on GEF-funded programs or projects; representatives of GEF Agencies and their implementing partners; and civil society actors, including indigenous leaders and CSO leaders (both CSO Network and non-Network members).

## PORTFOLIO REVIEW

The evaluation reviewed a sampling of program and project documents for evidence that requirements of the policies on stakeholder engagement, gender equality, and environmental and social safeguards are being met in the three stages of the project cycle: identification, design, and in implementation. A random selection was made of GEF-financed activities that were CEO endorsed between January 2014 and July 2021. This six-year span allowed for an examination of three discrete groups of projects: those operating under antecedent policy guidelines; projects passing through the CEO endorsement stage from the previous replenishment period at the time of the launch of the

**Table 2.2** Key informant interviews and focus groups, by stakeholder group

Stakeholder group	Engagement
Agency staff	~60 individuals with role related to gender equality, environmental and social safeguards, and stakeholder engagement in association with their GEF portfolio (14 Agencies—headquarters level)
GEF Secretariat	6
Country stakeholders	India—10 (3 Agencies, 2 CSO Network, 1 Executing Agency) Philippines—11 (3 Agencies, 2 CSO Network, 4 Non-CSO Network, 1 Executing Agency)
Convention staff	2
CSO Network leaders	7 in individual interviews and 1 findings workshop
Civil society	3 CSO leaders
Indigenous Peoples Advisory Group	8 in individual interviews followed by 1 focus group and subsequently a findings workshop
GEF Gender Partnership (GGP)	1 focus group with 19 participants (GEF staff and members of the GGP representing Agencies, conventions, and organizations)

## Box 2.1 E-survey distribution and responses

**Operational focal points:** 262 OFP contacts received the survey (a larger number was sent but 4 percent bounced back) and 52 responded in a 3-week window. After a quality check on the surveys received, the count was 41, a response rate of 16 percent.

**Civil society organizations:** 1,794 CSOs received the survey (a larger number was sent but 15 percent bounced back). Lists were provided by the GEF Secretariat and the GEF-CSO Network. Over 3 weeks, 442 surveys were received, a response rate of 25 percent. Among the 442 respondents, 231 (52 percent) were CSO Network members, and the balance not. There is no exact count for the number of CSO Network members sent a survey. However, it is known that there are about 500 members, currently. This suggests that the response rate among CSO Network members was close to 50 percent.

Table B2.1 shows how the survey respondents who are CSO Network members compare with the overall Network membership list.

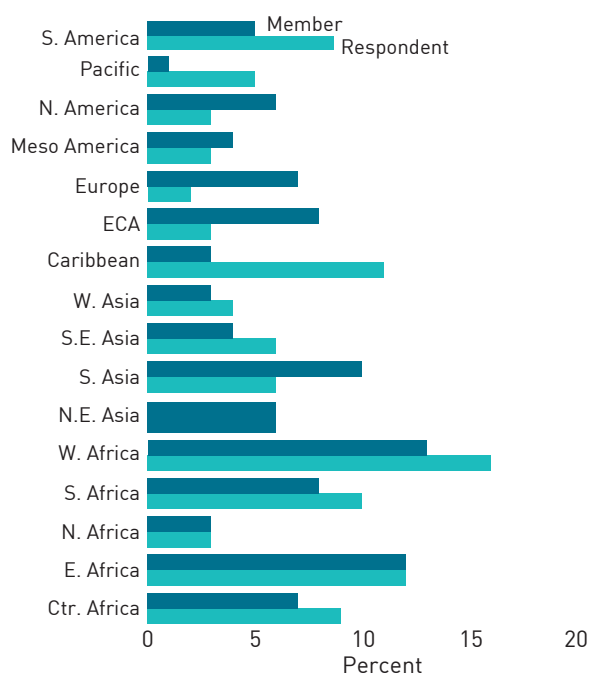
**Table B2.1 Profile of CSO Network member respondents**

Category	Network member respondents (%)	Network membership list (%)	Difference (percentage points)
<b>Geographic scope</b>			
Global	19	16	-3
Regional	35	13	-22
National	49	73	-24
Local	48	22	-26
<b>Focal area</b>			
Biodiversity	69	44	-25
Climate change	~50	48	-2
Land degradation	28	4	-24
Int'l waters	19	2	-17
Chemicals/POPs	10	1	-9

Figure B2.1 provides a regional breakout of survey respondents who are CSO Network members and the overall Network membership list.

The evaluation draws on e-survey data collected for the IEO Evaluation of the GEF-CSO Network, published in 2016. Many of the questions used in 2021 were repeated from the earlier surveys. In 2016, 1,036 surveys were sent to non-CSO Network members; the response rate was 16 percent. A further 466 surveys were sent to CSO Network members; the response rate was 22 percent.

**Figure B2.1 Regional breakout of CSO Network members and survey respondents, 2021**



Note: ECA = Europe and Central Asia.

updated policy; and projects identified and developed under GEF-7 and endorsed up to July 2020. The team concentrated their review on PIFs, CEO endorsement documents, project implementation reports (PIRs), and terminal evaluations. A random

sample of 336 was drawn from a universe of 571 projects for this time period. A numeric breakdown of projects across these three cohorts is set out in [table 2.3](#), and a description of the portfolio review analysis is provided in volume 2 of this evaluation report.

**Table 2.3** Sample frame and sample sizes of the GEF portfolio, by cohort

Cohort	Universe		Random sample	
	Number	Percent	Number	Percent
Cohort 1 (CEO endorsed after 2014)	346	60.6	183	54.5
Cohort 2 (GEF-6, CEO endorsed after 2018)	202	35.4	130	38.7
Cohort 3 (GEF-7, CEO endorsed after 2018)	23	4.0	23	6.8
Total	571	100	336	100

# Policy coherence and strategic alignment

## 3.1 Alignment of the GEF policies with GEF strategies

The three GEF policies are reflected in the GEF's strategic vision, priorities, and programming directions, albeit to varying degrees, with direct linkages to the Policy on Gender Equality the most readily apparent.

The GEF 2020 Strategy (GEF 2015) outlines a vision and five strategic priorities: (1) addressing drivers of environmental degradation; (2) delivering integrated solutions; (3) enhancing resilience and adaptation; (4) ensuring complementarity and synergies in the global financial architecture; and (5) choosing the right influencing models. These are supported by three core operational principles: mobilizing local and global stakeholders, improving operational efficiencies, and strengthening results management. The three GEF policies are aligned with the GEF 2020 Strategy in various ways:

- **Gender.** The GEF 2020 core operational principle of “mobilizing local and global stakeholders” states that the GEF will continue to strengthen its focus on gender mainstreaming and women's empowerment, emphasize the use of gender analysis as part of socioeconomic assessments

to ensure intervention design is gender sensitive, and utilize gender-sensitive indicators and sex-disaggregated data in projects to demonstrate concrete results and progress related to gender equality. Among the three GEF policies, this represents the most direct recognition of the instrumental role of program/project-level policy implementation with achievement of overall GEF strategic objectives.

- **Stakeholder engagement.** The 2020 Strategy indicates that the GEF will increase support for strengthening coalitions and partnerships around solutions to global environmental challenges (vision, point 1). The strategic priority on delivering integrated solutions calls for wider stakeholder partnerships, noting it “is critical to establish or strengthen platforms on which a broad set of stakeholders can come together” (GEF 2015, 22). Also, the first core operational principle (mobilizing local and global stakeholders) calls for increased partnerships with national and local governments and the private sector and strengthening work with CSOs, including indigenous peoples, through the GEF-CSO Network. It also calls for increased cross-national partnerships and collaboration with academic institutions. There is obvious overlap with the Policy on Stakeholder

Engagement here, however, without an emphasis in the 2020 Strategy on how strengthened stakeholder inclusion at the program/project level (driven by the policy) would contribute to these objectives.

- **Safeguards.** The GEF 2020 vision and first strategic priority focus on addressing the drivers of environmental degradation. There is obvious overlap, at least at the program/project level, with many provisions of the GEF Policy on Environmental and Social Safeguards, such as avoiding and minimizing threats to biodiversity and ecosystems (including invasive alien species), pollution and resource efficiency (including persistent organic pollutants [POPs]), heightened respect for indigenous peoples lands and resources, sustainable management of living natural resources (including application of certification schemes), and more sustainable supply chains (i.e., limiting procurement of natural resource commodities that contribute to conversion/degradation of natural habitats). However, the instrumental role of the GEF safeguards in addressing drivers of environmental degradation is not acknowledged. The clearest linkage back to the GEF safeguards concerns the GEF 2020 strategic priority on enhancing resilience and adaptation which calls for the integration of climate risk assessments and relevant risk mitigation measures into project and policy design, which is reflected in Minimum Standard 1.

Only the Policy on Gender Equality is explicitly referenced in the GEF-7 Programming Directions: “GEF-7 programming also follows the goals and principles as set out in the GEF’s Policy on Gender Equality, i.e., to promote gender equality and the empowerment of women and girls in support of the GEF’s mandate to achieve global environmental benefits” (GEF 2018f, para. 3). The GEF-7 Programming Directions call for mobilizing and strengthening diverse coalitions of

actors, especially the private sector; however, the instrumental role of the Policy on Stakeholder Engagement is not referenced. The document does not specifically reference the GEF Policy on Environmental and Social Safeguards; it does however include some general references to “safeguards” contributing to improved land management (para. 257), sustainable commodity production (para. 278), and respect for knowledge and rights of indigenous peoples (para. 388).<sup>1</sup>

## 3.2 Strategic relevance of the policies to GEF-8

With a vision for the eighth replenishment that sees, “achievement of a healthy, productive, and resilient planet that underpins the health and well-being of human societies” (GEF 2021, 14), the GEF proposes to deepen its holistic, systems orientation described in the GEF-7 strategy (GEF 2018f). Three interrelated challenges are top of mind: the COVID-19 pandemic, mounting stressors on natural systems, and the urgency for robust financing and a transformative agenda (GEF 2021).

The Healthy Planet, Healthy People framework underpinning the proposed GEF-8 strategy focuses on rebalancing the relationship between people and nature (GEF 2021), and it calls on the GEF to bring to the fore what are increasingly called nature-based solutions ([box 3.1](#)).

Key informants to this evaluation have observed that GEF’s comparative advantages place it in a strong position to help countries on the path to a greener/bluer future as the pandemic passes. The GEF’s mandate embraces all facets of a healthy environment. It has a long and good track record

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<sup>1</sup> The GEF-7 Replenishment Policy recommendations included a passing note that replenishment participants welcomed the Secretariat’s work on updating the GEF safeguards policy (GEF 2018h).



### Box 3.1 Nature-based solutions: definition and principles

#### Definition of nature-based solutions:

“Actions to protect, sustainably manage, and restore natural and modified ecosystems that address societal challenges, effectively and adaptively, simultaneously providing human well-being and biodiversity benefits” (IUCN 2016, 2).

#### Principles of nature-based solutions:

- Embrace nature conservation norms (and principles);
- Can be implemented alone or in an integrated manner with other solutions to societal challenges (e.g., technological and engineering solutions);
- Are determined by site-specific natural and cultural contexts that include traditional, local and scientific knowledge;
- Produce societal benefits in a fair and equitable way, in a manner that promotes transparency and broad participation;
- Maintain biological and cultural diversity and the ability of ecosystems to evolve over time;
- Are applied at the scale of landscapes/ seascapes;
- Recognize and address the trade-offs between the production of a few immediate economic benefits for development, and future options for the production of the full range of ecosystems services; and
- Are an integral part of the overall design of policies and measures or actions to address a specific challenge.

Source: IUCN 2016.

in the global environmental arena and across multiple convention areas (not just climate, but biodiversity, land, water, and chemicals). And it works at the nexus of natural and human systems where, in addition to global environmental benefits, the GEF’s interventions have generated socioeconomic

benefits that improve livelihoods and human health.

The relevance to the GEF-8 Strategy of GEF’s updated policies on stakeholder engagement, gender equality, and environmental and social safeguards (ESS) is clear. There are at least three points of connection.

First, advancing the nature-based solutions principles requires rigorous engagement with stakeholders, bringing often-neglected voices to the table, heightened attention to both downside environmental and social risks and impacts of supported actions as well as co-benefits, and strengthened voice and control of women over natural resource decision making. Further, nature-based solutions as a way of working takes its place in the GEF theory of change for GEF-8 alongside four additional cross-cutting themes: private sector engagement, gender-responsive approaches, resilience, and circular economy.

Second, in the theory of change for GEF-8, multi-stakeholder dialogues are proffered as one of four levers for the GEF partnership to use in pursuit of its strategic outcomes ([box 3.2](#)) and its goal. The

### Box 3.2 GEF-8 outcomes to 2030

- Post COVID-19 strategies by state and nonstate actors scale up “green” and “blue” recovery actions in priority landscapes and seascapes.
- Incentives and improved policy options promote innovations and behavior change for sustainability and resilience in target systems.
- Natural capital, nature-based solutions, and ecosystem services underpin transformation of target systems.
- Circularity promoted in supply chains to increase efficiency and reduce or eliminate negative externalities.

Source: GEF 2021.

other three are governance and policies, financial leverage, and innovation.

Third, the proposed strategy adds further expectations on corporate results reporting with a desire to understand more fully co-benefits (such as population health and environmental benefits) and the enabling contributions of the above-mentioned levers to the systemic changes envisioned in the GEF program.

The GEF-8 strategy document acknowledges the role of its “core policies and delivery modalities to support the GEF’s program and enlist the full power of the Partnership toward transformative results” (GEF 2021, 21). The evaluation concurs with its authors; GEF policies are far more than just the “how” of GEF’s work. If positioned with sufficient intention, they can help to translate and mainstream key GEF priorities across all GEF-financed activities and be central in delivering environmental and socioeconomic benefits. Promoting gender equality and empowering local stakeholders to control and defend natural resources could help drive transformational change and strengthen durable outcomes. Resolute application of safeguard requirements assists in mainstreaming considerations of biodiversity, ecosystems, pollution, greenhouse gases, health and safety, labor conditions, sustainable land and water management, and indigenous peoples’ rights and management of lands and resources. Further, the analysis and assessment processes required by the GEF policies often uncover key institutional weaknesses in policies and regulations, weaknesses that may further exacerbate the drivers of environmental degradation and socioeconomic exclusion.

As the partnership maps its GEF-8 programming priorities in support of “development pathways that are sustainable, inclusive, resilient, low-carbon, low-polluting, nature-positive, and circular economy-based—in essence...a blue and green

recovery” (GEF 2021, 15), it could further consider the instrumental role the GEF Policies on Gender Equality, Stakeholder Engagement, and Environmental and Social Safeguards could play in supporting a transformational agenda.

### 3.3 Consistency across the policies

#### AGENCY VIEWS

Interviews with Agency representatives show a general consensus that the design of the three policies is generally coherent without significant areas of misalignment. Some missed opportunities for stronger cross-referencing across the three policies were noted. A suggestion to provide an overarching, integrated introduction for the three policies was welcomed by several Agencies. In addition, some Agencies noted that the risk-based, “do no harm” focus of the GEF safeguards policy did not fully reflect the potential environmental and social benefits that arise from effective implementation and contrasted it with the “do good” framing of the Policies on Gender Equality and Stakeholder Engagement.

One potential area of misalignment was identified regarding the degree to which the key instruments for each policy (e.g., gender action plan, stakeholder engagement plan, Environmental and Social Management Plan) were aligned with one another. Here the Agencies could not always articulate the ways in which these instruments build off each other as they are developed. It was noted that with discrete guidelines for each policy the linkages were not immediately obvious. Interviews with some Agencies discussed the potential for either (1) merging the guidelines for the three GEF policies or (2) merging all three of these with the GEF Guidelines on the Project and Program Cycle Guidelines (GEF 2020d). While the second suggestion may prove overly complicated (mixing detailed

operational guidance with wide-ranging policy requirements), the potential merging of the guidelines for the three policies could provide Agencies with a more integrated picture on how to address the various policy requirements at stages of the project/program cycle. This issue could be explored in an effort to strengthen coherence, particularly in project/program implementation, acknowledging potential trade-offs regarding, for example, the level of detail that could be included without overwhelming a consolidated guidance document.

There is a range of opinion across Agencies on the degree of “prescriptiveness” desired in the package of policies and guidelines. What is welcomed guidance for some Agencies may be perceived by others as an imposition. Some of the larger Agencies appreciate the flexibility currently provided by the policies and guidelines while others are interested in more support and would welcome more step-by-step information or a handbook.

Some Agency respondents stressed that the policies should not be changed in the near future. A number of Agencies have undertaken significant efforts to align their policy frameworks with those of the updated GEF policies and noted that a track record should be established before any significant further policy changes (other than relatively minor issues of clarification or misalignment).

## DESK REVIEW OF POLICY CONSISTENCY AND ALIGNMENT

The following subsections present findings of a desk review of the consistency of the three GEF policies in terms of structure, scope of application, alignment and cross-referencing, and roles and responsibilities.

### Structure

The three GEF policies follow a similar structure. Each policy provides an introductory overview,

scope of application and effectiveness date, definitions, a set of mandatory policy requirements, and provisions regarding monitoring and reporting, compliance, and policy review. The Policies on Stakeholder Engagement and Gender Equality include additional sections on their purpose and scope as well as a set of core or guiding principles (absent from the Policy on Environmental and Social Safeguards).

### Scope of application

All three GEF policies include requirements that respectively apply to the GEF Secretariat and GEF Agencies, including specific provisions that need to be reflected in Agency policies, procedures, and capabilities. The Policies on Stakeholder Engagement and Gender Equality have broader scopes of application, applying to all GEF-financed activities (e.g., programs and projects, enabling activities, and national/regional outreach activities led by the GEF Secretariat, including Expanded Constituency Workshops) whereas the safeguards policy applies only to GEF-financed programs and projects, as would be expected. Only the Policy on Gender Equality includes the Council in its scope of application.

### Alignment and cross-referencing

The three GEF policies are mutually reinforcing with a natural overlap in thematic coverage. Effective implementation of each GEF policy relies in part on adherence to provisions of the other two (at least for GEF-financed programs and projects). However, the degree of formal alignment and cross-referencing varies across the policies, as indicated in [table 3.1](#), which highlights specific overlaps and any direct cross-referencing.

As indicated in [table 3.1](#), the degree of cross-linking of the three GEF policies is uneven despite obvious overlaps. Some key takeaways include the following:

**Table 3.1** Cross-referencing and linkages across the three GEF policies

Policy	Requirements that explicitly link to main thematic areas of other policies		
	Participation and consultations	Environmental and social risks and impacts	Gender issues
Policy on Stakeholder Engagement		<ul style="list-style-type: none"> <li>Does not refer to Policy on Environmental and Social Safeguards</li> <li>Stakeholder engagement required irrespective of level of environmental and social risks and impacts (6c)</li> <li>Consultations to allow stakeholders to express views on project risks, impacts, mitigation measures that may affect them (16b)</li> </ul>	<ul style="list-style-type: none"> <li>Does not refer to Policy on Gender Equality</li> <li>Core Principles refer to inclusive participation but do not reference gender</li> <li>Agency policies/procedures regarding consultations to be gender responsive (16c)</li> <li>GEF stakeholder engagement annual report uses gender-disaggregated data (20)</li> </ul>
Policy on Environmental and Social Safeguards	<ul style="list-style-type: none"> <li>“Umbrella” statement cross-linking three policies (3)</li> <li>MS1 (assessment) requires “Meaningful Consultations” (4h), references Policy on Stakeholder Engagement (footnote 14)</li> <li>MS4 (resettlement) refers to Policy on Stakeholder Engagement on “Meaningful Consultations” (9e, footnote 19)</li> <li>MS5 (indigenous peoples) requires “meaningful consultations” but does not reference Policy on Stakeholder Engagement</li> </ul>		<ul style="list-style-type: none"> <li>MS1 gender risk provisions reference Policy on Gender Equality (footnote 16)</li> <li>MS1 (4m-o) requires identification of adverse impacts on gender equality, gender-based discrimination and gender-based violence/sexual exploitation and abuse and response measures. These provisions more specific than in Policy on Gender Equality (Gender-based violence/sexual exploitation and abuse risks not specified)</li> <li>MS5 (indigenous peoples) requires consultations to be gender inclusive (11c)</li> </ul>
Policy on Gender Equality	<ul style="list-style-type: none"> <li>Does not reference Policy on Stakeholder Engagement</li> <li>Requires equal opportunity and participation of women and men (7)</li> <li>Guiding Principles include stakeholder engagement (8c), women’s participation (8d)</li> </ul>	<ul style="list-style-type: none"> <li>Does not refer to Policy on Environmental and Social Safeguards</li> <li>Requires identification of gender-differentiated risks and impacts (Gender Analysis, 10a)</li> </ul>	

Source: Policy documents.

Note: MS = Minimum Standard.

- **“Umbrella” cross-linking.** Only the Policy on Environmental and Social Safeguards includes a broad “umbrella” statement on how the three policies are intertwined, noting that in

addressing the safeguards policy requirements Agencies also need to ensure compliance with the other two. (While the safeguards policy was adopted after the other two, allowing for specific

cross-linking, the other two policies could have included statements indicating the complementarity of all three policies, with reference to the previous safeguards policy).

- **Specific cross-referencing.** Only the GEF safeguards policy includes specific cross-references to the other policies where there are coverage overlaps. Neither the Policy on Gender Equality nor the Policy on Stakeholder Engagement formally reference the other policies despite clear coverage overlaps (they are noted in a general “Related Documents” listing in the front matter).

### Areas of misalignment

At various points, one policy includes requirements or definitions that are germane to other policies but are not included there. For example, the Policy on Environmental and Social Safeguards includes some specific gender risk identification requirements not reflected in the gender policy, namely risks of gender-based violence and sexual exploitation and abuse. Also, the GEF safeguards policy includes more specific criteria regarding “meaningful consultations” than those contained in the Policy on Stakeholder Engagement.

### Missed opportunities

The above points represent some missed opportunities for strengthened consistency and alignment across the three GEF policies. With multiple areas of thematic overlap, the further integration of the three GEF policies could be strengthened to show them as a coherent and strategically relevant policy package. Tighter cross-referencing would help clarify where related requirements across the policies should be addressed in an integrative manner.

### Roles and responsibilities

The three GEF policies specify key actions to be undertaken by Agencies as well as the GEF Secretariat to promote effective implementation. Each

policy is structured similarly in this regard, outlining responsibilities at different stages of the project/program cycle.

[Table 3.2](#) compares the key roles and responsibilities of the GEF Secretariat and Agencies as stipulated across the three policies. As the table shows, the three GEF policies are relatively well aligned in terms of specifying key Agency and GEF secretariat responsibilities in addressing requirements of the three policies at program/project concept, approval, and implementation. However, some inconsistencies stand out. There are of course good reasons why some policies include certain elements and others do not, and some of the identified inconsistencies may also be addressed in practice and/or in policy guidelines. Nevertheless, they are noteworthy at the policy level, which establishes mandatory requirements. Key points include the following:

- The Policy on Stakeholder Engagement does not call on the GEF Secretariat to assess whether project framework documents/project identification forms reflect the policy requirements unlike the other two policies. This is called for only at CEO endorsement/approval (however in practice, this most certainly takes place earlier).
- The Policy on Environmental and Social Safeguards does not require Agencies to report annually on implementation progress (only at midterm and completion).
- The Policy on Gender Equality does not specify that adequate resources be provided to ensure effective implementation (as noted in the other two policies).
- Neither the Stakeholder Engagement Policy nor the Gender Equality Policy refers to the availability of the GEF Conflict Resolution Commissioner to receive complaints (only referenced in the GEF safeguards policy although the authorizing language would cover the other policies).

**Table 3.2** GEF Agency and GEF Secretariat key roles and responsibilities for the three GEF policies

Entity	Role/responsibility	Policy		
		Stakeholder Engagement	Environmental and Social Safeguards	Gender Equality
<b>Project framework document (PFD)/project identification form (PIF) stage</b>				
Agencies	In PFDs/PIFs, provide relevant description/ indicative information per each policy (i.e., on consultations, on E&S risks/impacts, gender considerations)	•	•	•
GEF Secretariat	Invite stakeholder input on PFDs/PIFs posted on website	•		
	Review PFDs/PIFs to assess whether documentation reflects policy requirements		•	•
<b>CEO endorsement/approval stage</b>				
Agencies	Provide additional information and relevant instruments (i.e., stakeholder engagement plan; E&S assessments and management plans; gender analysis)	•	•	•
	Include relevant actions, indicators, targets in project/ program results framework or logical framework			•
GEF Secretariat	Review requests for CEO endorsement/approval to assess whether documentation reflects policy requirements	•	•	•
<b>Implementation</b>				
Agencies	Oversee implementation of measures as set out in documentation	•	•	•
	Allocate adequate resources to promote effective implementation	•	•	
	Provide information on implementation progress in:			
	• Annual PIRs	•		•
	• Midterm reviews	•	•	•
	• Terminal evaluations	•	•	•
GEF Secretariat	Report promptly any cases reported to Agency accountability, grievance, and conflict resolution mechanisms		•	
	Prepare and maintain templates and guidelines to support implementation	•	•	•
	Report annually to Council on implementation of policies (i.e., level of stakeholder engagement; types of E&S risks/ impacts and management; progress on gender results, sex-disaggregated data)	•	•	•
	Make available GEF Conflict Resolution Commissioner to receive complaints related to GEF-financed programs and projects and other issues of importance to GEF operations and ensure contact information/procedures are readily available		•	
	Promptly make available on the GEF website information on cases reported to Agency accountability, grievance, and conflict resolution mechanisms		•	
	Generate and share knowledge, good practice methodologies, lessons learned; leverage national, regional, global outreach events and activities to raise awareness and support capacity development			•

Source: Policy documents.

Note: E&S = environmental and social.

- Only the Policy on Gender Equality includes requirements to incorporate relevant indicators and targets in the program/project results framework.
- Only the Policy on Gender Equality refers to sharing knowledge, good practice methodologies, and lessons learned, and leveraging national, regional, and global outreach events and activities to raise awareness and support capacity development.

Regarding overall compliance with the three GEF policies, Agencies are required to demonstrate that they have the necessary policies, procedures, and capabilities to ensure that they can meet the specific requirements of each policy. All three GEF policies specify similar compliance procedures whereby the GEF Secretariat facilitates an assessment of compliance, the development of time-bound action plans where gaps are identified, and once compliance has been established, periodic monitoring utilizing the procedures of the GEF Policy on Monitoring Agency Compliance with GEF Policies on Environmental and Social Safeguards, Gender, and Fiduciary Standards: Implementation Modalities (GEF 2016). The Secretariat has noted that it has been strengthening its portfolio-level review of policy implementation through increased tracking and reporting through the GEF portal, in line with the GEF Monitoring Policy.

### 3.4 Reporting on implementation

As noted above, each of the GEF policies includes reporting requirements over the project cycle, covering both Agency and GEF Secretariat responsibilities. The extent of the reporting requirements and related guidance varies across the policies:

**Safeguards.** Agencies are required to provide information on implementation of relevant environmental and social management measures at

project midterm and completion (as noted above, not in annual implementation reports). The Guidelines elaborate that Agencies should report on any revisions to the overall project/program environmental and social risk rating or identified types of risks, and any revised or new environmental and social assessment reports or management plans. At completion, Agencies are also to assess implementation of management measures and their effectiveness and lessons learned. The GEF Secretariat is required to report annually to Council on implementation of the policy, including the type and level of identified environmental and social risks and impacts, and management thereof, during implementation and at completion. The Secretariat also reports to Council and makes available on the GEF website information on cases reported to Agency accountability, grievance, and conflict resolution mechanisms.

- **Stakeholder Engagement.** Agencies are required to include information on progress, challenges, and **outcomes** regarding stakeholder engagement in annual PIRs as well as midterm and terminal evaluations. The Guidelines note that Agencies report against the program/project's stakeholder engagement plan, and should include participatory monitoring by stakeholders where feasible. The Secretariat is required to report annually to the Council on stakeholder engagement across GEF-financed activities, including the number and share of projects that **effectively engage stakeholders**, using gender-disaggregated data where appropriate, at CEO endorsement/approval, implementation, and completion. The Guidelines note that the GEF portal provides an updated tool for such reporting (however, the Guidelines do not elaborate on particular issues that could be covered).
- **Gender Equality.** Agencies are required to provide information in annual PIRs, midterm reviews, and terminal evaluations on progress,

**gender-sensitive indicators, and results.** (As noted above, the Gender Policy requires Agencies to include relevant actions, indicators, and sex-disaggregated targets in the program/project results framework or logical framework if gender-responsive measures have been identified.) The Secretariat tracks and reports annually to the Council, and, as required, to the multilateral environmental agreements that the GEF serves on portfolio-level progress, sex-disaggregated data, gender information, and results. The Guidelines provide more extensive considerations to be addressed during project implementation, midterm review, and for terminal evaluation, including guiding questions. The Guidelines also address the GEF Gender Tagging Framework, which facilitates addressing policy compliance and capturing portfolio results. In addition, the GEF Gender Implementation Strategy (GEF 2018b) includes a results framework with indicators that permit portfolio reporting on gender results (e.g., percentage and number of beneficiaries; progress on gender-responsive measures; sex-disaggregated and gender-sensitive indicators; and lessons learned).

The three GEF policies represent varying levels of ambition regarding implementation reporting and how the policy requirements contribute to achieving program/project results. Only the Policy on Gender Equality requires that key related benchmarks be incorporated in the program/project results framework (together with gender tagging where applicable) that allows for systematic reporting at the project/program and portfolio levels.

The Policy on Environmental and Social Safeguards calls for reporting basic data but is largely compliance focused. Terminal evaluations are to include an assessment of the “effectiveness” of relevant management measures, but the Guidance does not specify criteria or attempt to link this with

results. The Policy on Stakeholder Engagement calls for reporting on “outcomes” and projects that “effectively engage” stakeholders, but few if any criteria or guidance is provided. For these two policies, results pathways/indicators are not defined, guidance is relatively open ended in terms of reporting information (a contrast to the “guiding questions” in the gender guidance), and thus understanding is anecdotal on how these policies contribute to impact across the focal areas. The lack of more results-focused reporting for these two policies hampers the GEF in being able to draw conclusions between policy implementation and outcomes.

### 3.5 Knowledge sharing and brokering

As noted in [table 3.2](#), only the Policy on Gender Equality includes requirements to “generate and share knowledge on good practice, methodologies and lessons learned on promoting Gender Equality and Empowerment of Women related to the GEF’s areas of work, with a view to inform programming in furtherance of this Policy” (GEF 2017b, para. 16). In addition, the policy calls on the Secretariat and Agencies to “leverage national, regional and global outreach events and activities to raise awareness and support capacity development on gender mainstreaming related to GEF’s areas of work” (GEF 2017b, para. 17).

This knowledge sharing/brokering dimension is missing from the other policies although challenges regarding stakeholder engagement and addressing environmental and social safeguards are well known (for example, see the cases regarding GEF-supported programs/projects brought before Agency accountability, grievance, and conflict resolution mechanisms) (GEF 2020c).

The GEF partnership, with extensive relevant experience and expertise across the Agencies, is well



placed to leverage greater knowledge sharing across all three policy areas, not just for issues regarding gender equality and women's empowerment. The emphasis here is on GEF's knowledge sharing/brokering role as opposed to broader capacity development. The GEF partnership is a unique source of expertise across multiple challenging safeguard issue areas (e.g., ensuring safe working conditions for eco-guards/security personnel while protecting local communities from excessive enforcement and retribution) and stakeholder engagement challenges (e.g., in conflict areas). The GEF could consider increasing its facilitative role in targeted knowledge sharing.

### 3.6 Policy implementation during COVID-19

Agencies have provided feedback on addressing the requirements of the three GEF policies in the context of the COVID-19 pandemic. Agencies report that program/project development and implementation is continuing despite the COVID-19 risks but have noted that the project context can change rapidly, potentially rendering certain planned activities less relevant. Some larger projects have been difficult to appraise given the shifting context and many interventions (including stakeholder engagement) have been delayed. There was a suggestion that GEF Expanded Constituency Workshops (ECWs) and operational focal points (OFPs) could be even more vital in terms of helping to understand changing local landscapes given COVID-19 risks.

The pandemic has forced many Agencies to utilize more remote sensing technologies and approaches. In addition, local experts are increasingly being utilized to visit program/project sites for analysis and engagement.

Face-to-face engagement with program/project stakeholders has been a significant challenge given virus transmission risks. This is especially

the case for some indigenous people's communities and other isolated and/or disadvantaged and vulnerable groups (FPIC processes were cited as exceedingly challenging). Digital engagement approaches have been employed, but this is dependent on connectivity as well as some cultural norms. A number of Agencies acknowledge that there is a risk that such approaches may limit engagement for some stakeholders.

Some Agencies are relying further on local partners and consultants to help devise and navigate engagement processes with stakeholders. Local CSOs are more familiar with the local conditions and the availability of various communication channels. They have demonstrated the ability to quickly adapt to changing circumstances and have undertaken key activities, such as managing travel and outreach in remote areas, and organizing WhatsApp discussions and hotlines to resource persons.

Agency missions to project/program sites have at times been constrained by the pandemic and there is acknowledgment that additional monitoring and project site visits may be needed once the pandemic risks are minimized.

Several Agencies noted that the GEF has demonstrated understanding and needed flexibility as they seek alternative mechanisms for addressing key policy requirements, in particular stakeholder engagement processes.

### 3.7 Summary

- The three GEF policies are generally well reflected in the GEF's vision, strategic priorities, and operational principles, all of which emphasize mobilizing local and global stakeholders, broadening partnerships/alliances, gender mainstreaming, and women's empowerment. However, explicit linkages to the policies

other than the Policy on Gender Equality are often absent.

- The three policies are generally consistent in their structure, outlining mandatory requirements, including for monitoring and reporting, and delineation of roles and responsibilities. The policy documents are mutually reinforcing to a considerable extent, though there are gaps and missed opportunities for further integration that would show them as a coherent and strategically relevant policy package.
- With the exception of the Policy on Gender Equality, understanding is anecdotal on how the policies contribute to impact across the focal areas, hampering the GEF in being able to draw conclusions between policy implementation

and outcomes. Only the Policy on Gender Equality requires that relevant actions and indicators be integrated into the program/project results framework.

- The three GEF policies are mutually reinforcing, with a natural overlap in thematic coverage. Effective implementation of each GEF policy relies in part on adherence to provisions of the other two (at least for GEF-financed programs and projects). This complementarity could be made more explicit across the policies, with further cross-linkages and a potential set of common guiding principles as well as integrated guidance.

# Stakeholder engagement policy

## 4.1 Background and context

In 2015 the Working Group on Public Involvement was established to review and update the Public Involvement Policy with a view to achieving more effective stakeholder engagement in GEF operations.<sup>1</sup> At the 51st Council meeting, the Working Group recommended an update to the policy.<sup>2</sup>

The updated GEF Policy on Stakeholder Engagement was approved by Council in 2017 (GEF 2017a). The updated policy sets out mandatory requirements in three areas: project and program cycles;

activities led by the Secretariat; and Agency policies, procedures, and capabilities. Key differences between the updated and original policies follow:

- The updated policy is written exclusively in mandatory language, providing clarity for application and accountability.
- Clear minimum standards are identified for Agencies, to build on and complement those already established through safeguards and fiduciary standards.
- Clear requirements are established for program and project-level monitoring and reporting by Agencies, and portfolio-level monitoring and reporting by the Secretariat.
- Specific mandatory documentation requirements are set out for the project cycle, including a stakeholder engagement plan or equivalent at the CEO endorsement/approval stage.

The Guidelines on the Implementation of the Policy on Stakeholder Engagement were issued in December 2018 (GEF 2018a). This document provides information on how Agencies and the Secretariat should identify and adopt practical approaches to achieve the principles set forth in the Policy. Specific guidance is provided on the following: meaningful consultation (including key

<sup>1</sup> The Working Group included representatives of the GEF Secretariat, the CSO Network, the Council, GEF Partner Agencies, the GEF Indigenous Peoples Advisory Group, the IEO, and GEF operational focal points.

<sup>2</sup> An associated Council document had more specific recommendations which included: applying policy requirements regarding stakeholder engagement to ALL projects; requiring development of stakeholder engagement plans; ensuring full stakeholder access to complete project information at the Agency level; revising the GEF's templates, review, and tracking systems for stakeholder engagement in GEF project development and approval; strengthening the GEF Secretariat's access to information policies and practices; and developing a plan for revising the GEF's Public Involvement Policy.

elements); effective and inclusive engagement; incorporating local knowledge and viewpoints; ensuring gender equality and women's empowerment (with reference to the Gender guidelines); culturally appropriate consultations and Free Prior and Informed Consent (with reference to the Safeguards policy); access to information; and meetings and multistakeholder dialogues. Detailed guidance on mandatory requirements at each stage of the GEF project cycle, including stakeholder engagement plans, is also provided.

## 4.2 Assessment of the adequacy of the 2018 Stakeholder Engagement Policy

Adequacy of the updated Policy on Stakeholder Engagement is assessed through an analysis of the requirements of the policy as measured against those comparator institutions, as well as through user perceptions of design and of GEF activities to support implementation.

### BENCHMARKING ANALYSIS OF GEF STAKEHOLDER ENGAGEMENT REQUIREMENTS WITH THOSE OF LEADING COMPARATORS

The following is a brief comparative analysis of the requirements of the GEF Policy on Stakeholder Engagement with the stakeholder engagement requirements of the following five climate and development finance institutions and their equivalent policies and mechanisms:

- Green Climate Fund (GCF)—[Environmental and Social Policy](#), Sec. VII. Information disclosure, stakeholder engagement, and grievance redress (2018);
- Adaptation Fund—[Environmental and Social Policy](#) (2016);
- World Bank—[Environmental and Social Framework](#), ESS10, Stakeholder Engagement and Information Disclosure (2016);
- Inter-American Development Bank (IDB)—[Environmental and Social Policy Framework](#), ESPS10, Stakeholder Engagement and Information Disclosure (2020); and
- United Nations Development Programme (UNDP)—[Social and Environmental Standards](#), Part C: Stakeholder Engagement and Response Mechanisms, Access to Information (2019).

The GCF and the Adaptation Fund were selected given their peer roles in providing climate finance. The World Bank, IDB, and UNDP (all GEF Agencies) were included because their relevant policy frameworks for program/project-level stakeholder engagement were updated in recent years and, presumably, reflect recent developments and input from stakeholders.

### Key findings

The 2017 GEF Policy on Stakeholder Engagement defines stakeholder engagement as “a process involving stakeholder identification and analysis, planning of Stakeholder Engagement, disclosure of information, consultation and participation, monitoring, evaluation and learning throughout the project cycle, addressing grievances, and on-going reporting to stakeholders” (GEF 2017a, Definitions section). This multi-element definition aligns with those of the comparators.

The GEF Stakeholder Engagement Policy aligns with most of the general stakeholder identification, planning, and participation and consultation requirements that are contained in the relevant policies of comparator institutions. However, there is less emphasis in the GEF's policy on the two-way nature of consultations and the need to consider and to respond to stakeholder feedback.

The GEF Policy, however, is less specific than those of comparators regarding other dimensions of stakeholder engagement, namely information disclosure to project stakeholders and grievance redress (which the GEF policy does not address). These dimensions of stakeholder engagement are instead addressed more fully in the GEF Policy on Environmental and Social Safeguards, highlighting coverage gaps in the Policy on Stakeholder Engagement.

The GEF Stakeholder Engagement Policy is also less specific than some comparators regarding the need for specific measures to promote inclusion of disadvantaged and marginalized groups and individuals in programs and projects.

It is acknowledged by both GEF and Agency stakeholders that in formulating its policies the GEF seeks to strike a balance between establishing clear requirements without being overly prescriptive and detailed, which could make implementation more difficult and could raise more points of conflict with Agency policy frameworks. Nevertheless, the findings of gap areas and “lack of specificity” in the GEF Stakeholder Engagement Policy when compared to similar policies of other institutions are germane, indicating potential areas of strengthening when the policy is reviewed.

### Stakeholder participation and consultation

The GEF Policy on Stakeholder Engagement addresses most of the general stakeholder participation and consultation requirements that are contained in the relevant policies of comparator institutions. This includes the following:

- Requirements for stakeholder engagement across all projects, no matter the level of social and environmental risks and impacts
- Stakeholder identification and analysis
- Early engagement during project development and throughout the project cycle

- The need for adequately resourced stakeholder engagement plans that outline timing and methods of planned engagement
- The requirement that consultations be structured so as to be meaningful and effective, with a range of specified criteria, including access to relevant, timely information.

[Table 4.1](#) presents a comparison across the five comparator institutions and the GEF.

The GEF’s Stakeholder Engagement Policy compares favorably with the general program/project-level stakeholder participation and consultation requirements of the GCF and the Adaptation Fund but is less detailed in key areas than those of the other comparators (i.e., World Bank, IDB, and UNDP).

The GEF’s Stakeholder Engagement Policy is less specific than several comparators regarding inclusion of disadvantaged and marginalized groups and individuals. This finding is a matter of degree: GEF’s policy requires that consultations with stakeholders be free of discrimination and responsive to the needs and interests of disadvantaged and vulnerable groups (GEF 2017a, para. 16c). These are solid inclusionary principles. However, as noted in [table 4.2](#), the World Bank, IDB, and UNDP go further by requiring that: disadvantaged and marginalized groups be identified as part of stakeholder analysis; differentiated engagement measures be adopted to facilitate effective participation of disadvantaged and marginalized persons; and the specific information sharing needs of disadvantaged and/or disproportionately affected groups be accommodated given barriers of disability, literacy, gender, mobility, language, and accessibility. These additional requirements reflect a more targeted focus on removing or at least lessening access barriers for disadvantaged and marginalized stakeholder groups.

**Table 4.1 Stakeholder engagement and consultation: the GEF and comparator organizations**

	Stakeholder engagement	GEF	GCF	AF	WB	IDB	UNDP
1	Stakeholder engagement required for all projects (i.e., not risk based)	•	•	•	•	•	•
2	Identify stakeholder groups and individuals (stakeholder analysis)	•	•	•	•	•	•
3	Identify disadvantaged/vulnerable groups and individuals that may require different forms of engagement		•		•	•	•
4	Engage stakeholders early in project identification/development	•	•	•	•	•	•
5	Engage stakeholders throughout project cycle	•	•		•	•	•
6	Develop appropriately scaled stakeholder engagement plans, with criteria:	•	•		•	•	•
	• Describe timing and methods of engagement throughout project cycle	•	•		•	•	
	• Describe information to be communicated to stakeholders	•	•		• <sup>a</sup>	• <sup>a</sup>	
	• Describe how views of differently affected groups will be captured				•	•	
	• Describe measures to remove obstacles to participation				•	•	
	• Allocate adequate resources for stakeholder engagement plan implementation	•			•	•	
7	• Seek feedback from stakeholders on draft stakeholder engagement plan				•	•	
	Require meaningful engagement/consultations, with specified criteria:	•	•		•	•	•
	• Free of external manipulation, interference, coercion, intimidation, discrimination	•	•	•	•	•	•
	• Seek to avoid retaliation/reprisals against participants		•			•	•
	• Gender-responsive	•	•		•	•	•
	• Responsive to needs and interests of disadvantaged and vulnerable groups and individuals	•	•		•	•	•
	• Include differentiated measures for disadvantaged/vulnerable groups and individuals to allow effective participation				•	•	•
	• Culturally appropriate and tailored to language preferences of each group		•		•	•	•
	• Based on timely disclosure of relevant, accessible information	•	•	•	•	• <sup>b</sup>	• <sup>b</sup>
	• Stakeholders able to express views on project, risks, mitigation, benefits	•	•		•	•	•
8	• Consider and respond to feedback; explains whether/how views are taken into account		•		•	•	•
	• Documented, summary disclosed	•			•	•	•
9	Make reasonable efforts to ensure that community representatives in fact represent views of community and are facilitating communications in appropriate manner				•	•	
9	Seek feedback on project's environmental and social performance and implementation of mitigation measures				•	•	

**Source:** GEF IEO analysis of documents from comparator institutions.

**Note:** AF = Adaptation Fund; WB = World Bank.

a. Range and timing of.

b. In time frame that enables consultation.

**Table 4.2 Information disclosure: the GEF and comparator organizations**

	Information disclosure: project and ESS documentation	GEF	GCF	AF	WB	IDB	UNDP
1	Required program/project and ESS information to be disclosed:						
	• Summary of project (purpose, scale, duration)		•		•	•	*
	• Draft of stakeholder engagement plan		•		•	•	•
	• Summary of stakeholder consultations	•	•		•	•	•
	• Draft assessments and management plans			•	• <sup>a</sup>		•
	• Summary of ESS documentation in comprehensible, nontechnical language					•	
	• Final assessments and management plans	•	•	•	•	•	•
	• Updated project and ESS plans during implementation		•	•	•	•	•
	• Monitoring reports	•	• <sup>b</sup>	•			• <sup>b</sup>
2	Form, language of disclosures specified:						
	• Stakeholders have access to timely, relevant and understandable information on project activities	•	• <sup>c</sup>	• <sup>d</sup>	• <sup>c</sup>	• <sup>c</sup>	• <sup>c</sup>
	• Consider special needs of disproportionately affected groups or those with specific information needs, such as due to disability, literacy, gender, mobility, language, accessibility				•	•	•
3	Timing of ESS disclosures specified:						
	• General: timely, prior to appraisal/approval	•	•		•		•
	• Specific disclosure timelines (Category A: 120d pre-approval/30d Category B)		•				
4	ESS documents posted on institution website						
	• Assessments and management plans		•	•	• <sup>e</sup>	•	• <sup>f</sup>
	• ESS disclosure notification		• <sup>g</sup>				

**Source:** GEF IEO analysis of documents from comparator institutions

**Note:** AF = Adaptation Fund; ESS = environmental and social safeguards; WB = World Bank.

a. Draft environmental and social commitment plan.

b. To affected communities.

c. Provide in relevant local languages.

d. Provide in appropriate way for affected communities.

e. For high/substantial risks, include environmental and social commitment plan.

f. When part of project document.

g. Disclosure form showing date and language of local and institutional disclosure.

GEF's Stakeholder Engagement Policy is also less specific in several key areas, including considering and responding to stakeholder feedback, tailoring consultations and information to the language preferences of stakeholder groups, and seeking stakeholder feedback on a project's social and environmental performance during project implementation. Curiously, these issues are more clearly addressed in the GEF Policy on Environmental and

Social Safeguards, presenting a consistency gap between the policies.

The GEF Stakeholder Engagement Policy requires that consultations provide stakeholders the opportunity to express their views on project plans, benefits, risks, etc. (para. 16b). More specific comparator policies (e.g., those of the World Bank and IDB) go a step further, requiring that stakeholder

engagement plans describe how views will be captured and that consultations will consider and respond to stakeholder feedback and explain how stakeholder views will be considered. These policies further require that stakeholders can provide feedback on a draft stakeholder engagement plan ([table 4.1](#)).

The GEF Stakeholder Engagement Policy requires that stakeholder consultations be sustained throughout the project life cycle (GEF 2017a, para. 16a). The relevant policies of the World Bank and IDB are more focused regarding engagement during project implementation, requiring project implementers to seek stakeholder feedback on the project's environmental and social performance and implementation of mitigation measures ([table 4.1](#)).

The above points are key elements of the definition of “meaningful consultations.” Curiously, the GEF Stakeholder Engagement Policy does not include a definition for “meaningful consultations” (noted at para. 16b) but the GEF Safeguards Policy does (at Minimum Standard 1 [MS1], para. 4h, and the Definitions section). The definition emphasizes, among other areas, the two-way nature of consultations, the need to consider and respond to stakeholder feedback, and the need to provide information in culturally appropriate formats and relevant local languages and in a time frame that enables consultations. In this respect, the GEF Safeguards Policy goes further than the GEF Stakeholder Engagement Policy in terms of specifying criteria for meaningful stakeholder consultations. While the GEF Guidelines on the Implementation of the Policy on Stakeholder Engagement include the definition and criteria for meaningful consultations, this further highlights the gap in the policy itself.

## Information disclosure

The GEF's requirements for disclosure of project information to stakeholders are not as specific

as those of comparator institutions. The GEF's Stakeholder Engagement Policy requires that stakeholders “have access to timely, relevant and understandable information about activities implemented by the Agency and clear procedures to request information” (GEF 2017a, para. 16e). This is an all-encompassing requirement, but it does not provide much direction.

The policies of most comparator institutions require that relevant information be provided in an accessible place and in an understandable form and language, with several institutions (GCF, World Bank, IDB) emphasizing “in relevant local languages” ([table 4.2](#)). The GEF's Guidelines on the Implementation of the Policy on Stakeholder Engagement emphasize the need to provide relevant project information in appropriate languages, but not the Policy itself. The only other disclosure requirement concerns making public a record of stakeholder engagement throughout the project cycle (GEF 2017a, para 16c).

Again, the GEF Safeguards Policy provides greater specificity than the Stakeholder Engagement Policy regarding project-level information disclosure. The GEF's Safeguards Policy requires that documentation regarding a project's potential environmental and social risks and impacts be disclosed “in line with the Agencies' applicable policies,” including information on risk screening and categorization, assessment and mitigation/management plans and monitoring information (MS1, para. 4h).

The GEF's disclosure timing requirement for project information is also very general (“timely”). As noted in [table 4.2](#), most comparator institutions place greater emphasis on the disclosure of draft environmental and social safeguard (ESS) documentation: GCF, World Bank, IDB, and UNDP require disclosure of draft stakeholder engagement plans; Adaptation Fund, World Bank, and UNDP require disclosure of draft assessments and management plans. The GCF includes specific



timelines for disclosure of ESS documentation prior to GCF approval.

In addition to local disclosure, most comparator institutions, including GCF and the Adaptation Fund, require the posting of project environmental and social assessments and management plans on their institutional websites. The GEF does not appear to follow this practice. In addition, the GCF requires recipients of GCF funding to provide an [ESS disclosure report](#) that indicates the dates, languages, and links—both local and institutional—of disclosed ESS documentation, potentially demanding greater accountability for ensuring local disclosure.

### Local grievance mechanisms

Despite inclusion of grievance redress as an element of the definition of stakeholder engagement, the GEF Policy on Stakeholder Engagement does not address it. This key element is instead addressed in the GEF Safeguards Policy. Minimum Standard 2 (MS2) of the GEF Safeguards Policy outlines requirements for accountability mechanisms and grievance/conflict resolution systems at both the Agency and local levels. MS2, para. 6i states that Agency grievance and conflict resolution systems need to include “a locally-available option at the project or program level that is established early, proportionate to the potential risks and impacts of the project or program, readily accessible, culturally appropriate, and with appropriate confidentiality provisions.”

The way the MS2 grievance system requirements are structured makes it difficult to understand which criteria apply to Agency systems and which to local grievance options. Not all the criteria in para. 6 appear applicable to local options (such as para. 6d regarding independence from project teams; project-based grievance mechanisms are often run by project implementation units).

Comparator institutions have included more criteria on the design of local grievance mechanism than those contained in the GEF Safeguards Policy ([table 4.3](#)). All stipulate that project-affected parties be informed of the local grievance mechanism during the stakeholder engagement process. The GEF requirements are more general (grievance systems are to be “broadly advertised” to stakeholders, MS2 para. 6h) but again it is unclear if this refers to Agency systems or local options, and the stakeholder engagement process is not specified as a key communication channel. The lack of treatment of grievance mechanisms in the Stakeholder Engagement Policy emphasizes this potential gap area.

The GEF grievance system requirements in the Safeguards Policy include features that have received heightened attention in comparator policies, such as the need for measures to minimize the risk of retaliation against complainants and the need to respect confidentiality where necessary. However, the GEF anti-retaliation requirements are limited to the grievance process whereas other institutions have extended this more broadly to stakeholders that seek to participate in (or receive information on) a project ([tables 4.1 and 4.3](#)). Other common local grievance mechanism features not addressed in the GEF requirements include no costs to complainants, potential use of existing mechanisms, and not impeding access to judicial or administrative remedies.

### BUY-IN AND SUPPORT FOR THE POLICY ACROSS THE PARTNERSHIP

The Policy on Stakeholder Engagement is relevant to all stakeholders in the partnership though it is specifically focused on the Agencies and the Secretariat with mandatory requirements. This section examines the degree to which stakeholders support the policy two and a half years after its launch.

**Table 4.3** Grievance redress mechanisms: the GEF and comparator organizations

	Grievance redress mechanisms	GEF	GCF	AF	WB	IDB	UNDP
1	GRM/channel available at project/local level	•	•	•	•	•	•
2	Project-level GRM criteria specified:						
	• Address concerns in accessible, timely, transparent, responsive manner	• <sup>a</sup>	•	•	•	•	•
	• GRM design proportionate to level of risks and impacts	•	•		•	•	•
	• Gender- and age-inclusive, address access barriers for marginalized and disadvantaged groups						•
	• Rights-compatible		•				•
	• Inform affected parties of GRM during stakeholder engagement		•	•	•	•	•
	• Will not impede access to judicial or administrative remedies		•		•	•	•
	• Utilize existing mechanisms where suitable/feasible			•	•	•	
	• At no cost to complainants		•		•	•	•
	• Without retribution/retaliation	• <sup>a</sup>	•		•	• <sup>b</sup>	•
• Allow confidential/anonymous complaints	•			•	•		
3	Disclose record documenting responses to all grievances	• <sup>a</sup>			•	•	

**Source:** GEF IEO analysis of documents from comparator institutions.

**Note:** AF = Adaptation Fund; GRM = grievance redress mechanism; WB = World Bank.

a. Minimum Standard 2 of the GEF Safeguards Policy establishes a range of criteria for Agency grievance and conflict resolution systems, including addressing complaints in a timely, culturally appropriate manner; broadly advertising the mechanism to stakeholders; taking appropriate measures to minimize risks of retaliation; and keeping records and informing stakeholders about progress of cases. However, the way the requirements of MS2 are structured make it difficult to discern whether all the criteria apply to local grievance redress options or just the criteria that are stipulated in the paragraph regarding local mechanisms (para. 6i).

b. Take remedial measures if retaliation, abuse, discrimination.

## Agency view

Overall, GEF Agencies describe the policy as well designed (clear in meaning and intent) with requirements that are realistic and appropriate. They see in the upgrade from the antecedent Public Involvement Policy a tendency avoided; that is, where the instigator (in this case the GEF) sets the policy requirements bar too high to be realistic, potentially creating unrealizable expectations for implementation.

Buy-in and utilization of the policy by GEF Agencies is conditioned by several factors: agency type—United Nations (UN), international financial institution, nongovernmental organization (NGO)—its scale of operation, length of time as a GEF Agency, and the relative size of the GEF’s

participation in the Agency’s portfolio of programs/projects.

- GEF Agencies that are themselves NGOs, describe stakeholder engagement as being fully part of their organizational DNA.
- For the international financial institutions, stakeholder engagement is/has been more an incremental integration of ethos into practice.
- UN organizations approach stakeholder engagement from the vantage point of international human rights standards/agreements, whereas international financial institutions approach the practice from an understanding of environmental and social risk (IFC 2007; UNDESA and UNITAR 2020).

A distinction commonly drawn between the international financial institution and UN approaches is that, in general, the former tends toward a “do no harm” stance, whereas the latter tends toward a “do good” stance. Key informants recognize the international financial institution influence in the language of the GEF policy but, regarding stakeholder engagement, see scope to interpret the language in a way appropriate to their organization. A minority of Agency informants observed the modest degree to which the GEF is explicit on the values orientation of its suite of policy documents addressing inclusion given the diverse composition of the partnership.

Others, a minority, pointed to a policy design emphasis on procedural compliance over policy results. The concern, most observed regarding the guidelines, is that the GEF is overly focused on “how” type questions vis-à-vis policy requirements. The contention is that these are more appropriately determined by the Agencies, as implementers. Mention is also made of the practical considerations of portfolio management given the diverse composition of the partnership.

Not surprisingly, thresholds for making compliance adjustments are higher in Agencies with GEF portfolios that are significant in their mix of funded programs and projects. Some of the newer Agencies—treading into the policy area with less prior experience—have been guided by the GEF in the development of their own policies. Across the board, there is a clear preference toward not running a parallel process of observing GEF and own policies simultaneously. This is described as expensive and time consuming.

### Operational focal point view

OFPs are less directly involved than Agencies as implementers of the GEF Stakeholder Engagement Policy. Unlike GEF-accredited Agencies, they are not held to any mandatory commitment regarding

implementation. In the survey responses of OFPs, this lesser degree of engagement is evident.

Among OFP respondents, there is an ambivalence about what is expected of them in relation to supporting any of the three policies addressing inclusion, including the Policy on Stakeholder Engagement. 29 percent of OFP survey respondents said they were “completely clear” on their role in supporting policy implementation, while the largest number (~60 percent) said they were “moderately clear.” A further 12 percent said that they were not at all clear. The majority of OFP respondents (55 percent) could not recall participating in any session where they had received information on the Stakeholder Engagement Policy (37 percent of respondents said that they had).

The GEF addressed questions about OFP role delineation in its 2018 information document to Council, “Practical Steps to Improve Coordination and Workflow in the GEF Partnership” (GEF 2018d). Policy support aspects are evident in four ways in the listing of OFP roles, albeit without specific guidance: stakeholder convening and consulting on GEF matters including country environmental strategies and objectives; awareness raising on GEF in country; monitoring and endorsing program/project designs; and tracking implementation and collaborating on monitoring and evaluation at the program, project, and portfolio levels.

Regarding the Stakeholder Engagement Policy, specifically, slightly more than half of the OFP survey respondents said that they use this document on an occasional basis and are not fully familiar with its requirements (~40 percent) or that they use it frequently and are familiar with its requirements (~15 percent).

By and large, the OFP users find the policy and its associated guidelines to be clear in its formulation. On the question of relevance, OFP respondents described the Stakeholder Engagement Policy as

“applicable” (60 percent) or “mostly applicable” (35 percent), that is, where the requirements work in some settings but not in others. Commentary on policy application focused on the following factors affecting its use: the existence of traditional norms that contradict requirements in some settings, a variability of stakeholder understanding over the scope for them to be involved, and a lack of transparency on the part of Agencies.

By their own assessment, OFPs and their offices are most constrained in their policy support role by the availability of budgetary resources, by knowledge of best practices that could be applied, and by the access they have to expert support. In all instances, these constraints are present to a “considerable” extent for between 40 percent and 50 percent of respondents.

### CSO view

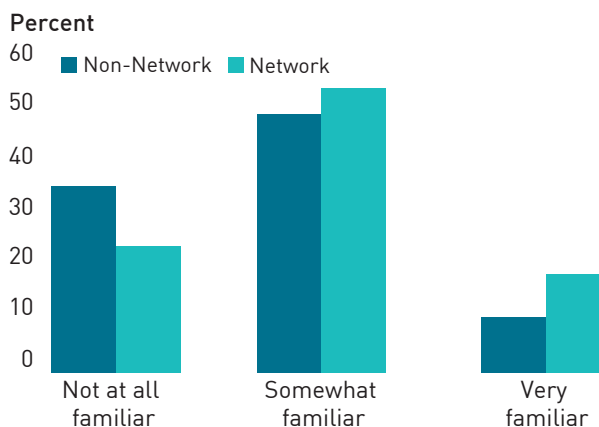
Among CSOs, slightly more than half indicated that they are “somewhat familiar” with the Stakeholder Engagement Policy. The other half are divided between “not at all familiar” (30 percent) and “very familiar” (16 percent).

As shown in [figure 4.1](#), CSO Network members are more likely than their non-Network peers to know the policy. This likely reflects the attention paid by the Network to the development of the updated policy and its historic role providing review and commentary on the antecedent Public Involvement Policy (1996, updated 2012) and associated guidelines (2014).<sup>3</sup>

In a statement to the 53rd GEF Council (November 2017), where the updated policy was approved, the CSO Network expressed support for its content and encouraged the development of accompanying

<sup>3</sup> In 2013, the CSO Network carried out a review of the Public Involvement Policy which included a recommendation that it be updated.

**Figure 4.1** Reported civil society familiarity with the 2018 Policy on Stakeholder Engagement



Note:  $n = 397$ .

guidelines with a commitment to contribute inputs through a consultative process. In particular, the Network noted, “affirmation of the GEF’s commitment to FPIC and ILO 169 for GEF financed projects,” and the provision mandating Agencies to, “propose and allocate adequate resources in their respective program and project budgets to promote effective stakeholder engagement...” It also identified two areas of concern (GEF-CSO Network 2017):

- The absence of a reference to a grievance mechanism (beyond acknowledgment of its inclusion in the Environmental and Social Safeguard Policy);<sup>4</sup>
- Insufficient attention, under the requirements for compliance, monitoring, and reporting, to quality assessment and best practice reporting concerning stakeholder engagement (reference to paragraph 18 in the policy).<sup>5</sup>

<sup>4</sup> This observation is taken up in the comparator study of the policy document discussed in [section 4.2](#).

<sup>5</sup> This is taken up in evaluation observations related to reporting in [section 4.3](#).

## MONITORING AND REPORTING

Agency representatives described GEF’s reporting guidelines as clear, though for those Agencies less used to reporting on more complex social/environment programming, additional guidance would be useful (with examples). The majority said that the information gathered for reporting is useful for Agency learning and internal reporting.

About half suggested that the reporting is more complex, requiring more qualitative analysis and drawing from multiple sources, though not necessarily in an onerous way. The remainder described it as compatible, in some instances because they have built their own templates to match the requirements. A minority of Agencies described differences over timing and details to be collected. Being asked to put reports into English was noted as an irritant in a few instances, as the request to do so runs counter to the ethos of stakeholder engagement/inclusion.

A minority of Agency representatives expressed concern that the guidelines do not build toward the aggregation of project documentation on stakeholder engagement at a portfolio scale of analysis, and that more structure would increase the strategic relevance and utility of data collection. Better indicators on engagement with indigenous peoples was mentioned most frequently, often with the suggestion that this work be an inter-Agency collaboration. An example of one Agency’s experience with a more rigorous reporting approach is set out in [box 4.1](#).

Those experienced with the GEF portal described it as being “more” user friendly, acknowledging that improvements have been made. Continuing limitations most frequently mentioned are not being able to extract data from the portal for the Agency’s own analysis or for sharing with others in the partnership (e.g., OFPs), and formatting glitches. At the same time, others, including in country/regional

### **Box 4.1 A more serious approach to documenting engagement with civil society organizations**

The Asian Development Bank (ADB) recently changed how it measures CSO engagement. Until 2020, ADB asked project officers to describe planned CSO engagement; there was no structure to the question, and token reporting was common. Anything that was CSO engagement qualified. Standard compliance across the ADB portfolio was well over 90 percent.

In 2021, ADB revamped its reporting requirement. Project teams are now asked whether they have a plan for meaningful CSO engagement during implementation. “Meaningful engagement” is spelled out. Staff can no longer talk obliquely about “feedback.” The project documents need to define the feedback from CSOs and how it was used. Project documents must specify how feedback is to be reported back to stakeholders.

ADB’s new metric calculates the number of projects that delivered what they said they would do on engagement as a percentage of the projects that planned to deliver meaningful CSO engagement. The 2021 score went from the 90 percent range to 79 percent.

Introduction of the metric has set in motion a change within the organization on CSO engagement practice. In short, the change shifts the focus from doing undefined activities with CSOs to delivering something meaningful that was planned with civil society. It recognizes that not all projects engage civil society, but that ADB is holding project teams accountable for delivering the CSO engagement they planned. This has resulted in a better understanding of what civil society is (many equated civil society with NGOs), the value CSO collaboration brings to a project, and how to use CSO engagement to help deliver development results.

**Source:** GEF IEO interviews.

offices, describe the portal as a useful browsing tool for getting project design ideas.

Not getting feedback on reports, once entered in the portal, leaves Agencies unsure about whether or how reports are used, or whether they meet expectations. This has created a perception that the GEF is underusing the information provided. Recurrent concerns were that it was, “reporting for the sake of reporting,” a drain on time without the benefit of any interaction, and that the lack of exchange amounted to missed opportunities for learning. At the same time, there were expressions of understanding from Agencies that workload implications of project reporting on the GEF Secretariat are significant. This point was reinforced in conversations with Secretariat staff.

In the survey, almost all OFP respondents indicated that they collaborate on monitoring and evaluation at project, program, and portfolio levels to a “moderate” (47 percent) or “great” (40 percent) extent, and that in that role they were able to gauge compliance with requirements to a “moderate” (68 percent) or “great” (18 percent) extent. About 15 percent of respondents said they were unable to make those assessments.

Challenges identified by OFPs included a lack of information provided by Agencies and limitations on OFPs’ own working conditions. Respondents pointed the several gaps: role clarification and training on minimum requirements and on the monitoring and evaluation role; resource allocations to support OFP roles; paucity of evaluation data bearing evidence of policy effectiveness; and insufficient requirements on Agencies to involve OFPs.

## **OBSERVED CONSTRAINTS ON AGENCY IMPLEMENTATION OF POLICY REQUIREMENTS**

Constraints on implementation are noted by Agencies in three areas, mainly: internal (Agency/

project team) experience/capacity to integrate stakeholder engagement in design and implementation; inadequacy of time and budget to undertake quality stakeholder engagement; and prevailing social/political context in some countries.

There is uneven experience with stakeholder engagement practice among those managing and/or monitoring programs and projects. Dimensions include understanding of purpose; knowledge of mapping/identification practices, engagement techniques, and documentation requirements; and knowledge of or access to consultant resources to support the practice. The Mozambique case study points out, for example, that the practice of stakeholder engagement is relatively new in the country across sectors at the levels of policy/regulation and field implementation. This concern is discussed under Knowledge sharing on [page 36](#).

Resources and time to enact the requirements are described as insufficient, at times, on account of the complexity of stakeholder dynamics in the project and on the limitations of GEF project preparation grant (PPG) resources. Time variables come into play in: identifying stakeholder interests, building trust in a process of engagement, and managing the logistics and sequencing of activities. Regarding resource availability, it is observed that GEF’s PPG parameters remain unchanged despite there being more demanding policy requirements to address inclusion.

While acknowledging the challenges in obtaining meaningful engagement, there are differing views on the extent to which Agencies should rely upon the PPG for this purpose. The evaluation encountered three concerns, voiced by Agency and GEF Secretariat staff:

- As a GEF-accredited Agency, there should already be considerable capabilities in place to undertake project preparation activities,

including the reach to access sources other than or in addition to the PPG.

- As it stands, the GEF is the only climate agency to administer a grant across all project modalities; while it has funding limits, there is scope for additional support, with justification.
- The enabling effects of PPG funds, and the outcomes obtained through their use, are not well understood within the GEF partnership.

Sociocultural, economic, and political factors influence a country's disposition toward stakeholder engagement. Key informants indicate that shifts can occur rapidly with the ebb and flow of national politics and geopolitical influences. As such, these factors lie at or beyond the limits of the GEF's sphere of influence and have a lot to do with country ownership. Their management requires contextualized attention by Agencies in three areas: communication of the policy commitment itself, exploration of the opportunities and potential benefits that can accrue from its implementation, and utilization of methods and tools for engagement that are compatible.

## SUPPORT FOR IMPLEMENTATION

No formal awareness raising or training plan was made in connection with the release of the Policy on Stakeholder Engagement. The same is true for the Gender Equality Policy, launched at the same time. The Partnerships Team at the GEF Secretariat discussed options based mostly on dissemination opportunities listed on the annual schedule, notably those through the Country Support Program. Orientation sessions were carried out at Expanded Constituency Workshops in 2018 and 2019. As well, the policies were introduced at the twice annual Agency retreats and at the GEF Introduction Seminars, an annual invitational orientation session for Agency, OFP, and CSO personnel new to the GEF.

Program managers in the GEF Secretariat, who are responsible for providing technical reviews of program/project documents, have received one-on-one advisory support. To support the Gender Equality Policy, the GEF went one step further in a collaboration with UNDP and the United Nations Institute for Training and Research to develop an online course on gender equality and women's empowerment (described in [chapter 8](#)).

Commentary on the support provided by the GEF falls into three areas: policy-related training/orientation, business processes related to the identification and design phases of the program/project cycle, and the capture and sharing of knowledge across the partnership.

### Training/events

Across partner Agencies, staff exposure to familiarization seminars is, as expected, particular to those with GEF portfolio-related responsibilities. Correctly, the general perception is that the GEF does not have a systematic training program to support stakeholder engagement practice. The majority of country/regional office key informants (in Costa Rica, India, Mozambique, and the Philippines) could not recall being part of a GEF orientation. Any information received on the policy would most likely have come through their own agency channels.

Recall of sessions attended indicates general satisfaction with the information received as an introduction. Six design ideas emerged from key informants referring to their own training experience and observations of other policy-related training with which they were familiar:

- Additional training, targeted at specific users (e.g., country government personnel, portfolio managers, CSOs) solidifies knowledge uptake.
- Participatory training approaches are favored over didactic content delivery.

- Practical, situation-based learning helps to contextualize content.
- Use of incentives (e.g., recognition or certification for participation) can sharpen participation and interest.
- Fostering connections among content-area focal points/key contacts is strategic.
- The presence of online training content reduces reliance on individual Agency focal points to be the conveyors of policy-related content; it also increases the scope for asymmetric learning (i.e., people learning what they need, when they need it).

A cautionary view on the use of incentives is that these can only go so far in attracting personnel to new knowledge. A key informant who runs a training program within her agency observed that people “do not know what they do not know” and so may not see themselves as benefiting from the training content.

Expressions of “need” for training are variable across Agencies; variability hinges on the key characteristics of the partner. The newness of the Agency to the partnership, the relative size of the GEF portfolio held within it, and the level of acquired experience in stakeholder engagement practice are determinants in this regard.

The proportion of OFP respondents reporting participation in training related to stakeholder engagement is about one in three. As with Agency personnel, the training received is regarded as adequate for introductory purposes but insufficient to supply guidance on how OFPs might engage Agencies and institutions or gain clarity on roles for themselves and for Agencies. Feedback shows that a focus on targeted, practical, on-demand learning is top priority for enhancing support. More one-to-one interaction between OFPs and GEF staff, and an allocation of material and financial support

resembling the grant once offered but withdrawn for GEF-7, is also mentioned.

## Business processes

There is a consensus across Agencies that staff members at the GEF Secretariat provide excellent individual feedback on the application of policies at the project level. They are accessible and responsive, and provide quality information. There is, however, a generalized critique of the review process and of commentary received from the GEF Secretariat on individual projects at PIF and CEO endorsement phase. Described as “assembly line,” feedback on the documents comes piecemeal and without consolidation. This is viewed as a burden to Agencies and an inefficient use of GEF resources.

## Knowledge sharing

Partner Agency informants and other stakeholders view the GEF as well positioned to collect and send information relevant to stakeholder engagement both within and beyond the partnership. Key reasons for this include the following:

- Universal relevance of stakeholder engagement activities across the convention focal areas
- Presence among GEF Agencies and the larger partnership of those with stakeholder engagement experience to share and those with interest in learning
- GEF’s global reach and its connectedness to civil society and indigenous people’s organizations, dedicated evaluation functions attached to Agencies, and to the science community (STAP).

On the scope of knowledge sharing on stakeholder engagement practice envisaged by key informants, mentions included: knowledge systems and theoretical models; case studies of context-specific applications of stakeholder engagement; and at a more practical level, engagement methods, tools, and techniques; ways of documenting/measuring



impact; a database of expert consultant resources for countries; and tools and tips for using the GEF's knowledge portal.

The GEF Gender Partnership is widely seen as a successful example of knowledge sharing, and one worth emulating as an example of GEF driving a community of practice/knowledge sharing platform. Valued aspects of this partnership include high-quality guidance, connectivity among members, and the online gender and environment course. Other knowledge sharing examples exist, including those supported by the GEF, such as the sector-focused International Waters Learning Exchange and Resource Network (IW-LEARN) introduced in [box 4.2](#).

In the service of better stakeholder engagement practice, a more proactive “brokering” role is envisaged for the GEF by Agency, OFP and civil society key informants. Ideas include: developing a consultant orientation/certification on the GEF's Stakeholder Engagement Policy and practices; convening dialogues between divergent stakeholder groups (such as indigenous peoples organizations [IPOs], and sustainability-committed brands); and supporting innovative practice and learning in stakeholder engagement through use of a granting mechanism.

At the same time, Agency informants cautioned that investment in knowledge or relationship brokering should not detract from the GEF Secretariat's finite capacity to respond on the more “essential” aspects of program/project cycle management. Secretariat core functions are considered to be in the area of program/project approvals and implementation support.

#### **Box 4.2 IW:LEARN: a knowledge-sharing platform for the GEF international waters portfolio**

The IW:LEARN project was established to strengthen transboundary water management around the globe by collecting and sharing best practices, lessons learned, and innovative solutions to common problems across the GEF International Waters portfolio. It promotes learning among project managers, country officials, implementing Agencies, and other partners. Platform activities fall under three categories:

- Face-to-face learning events and dialogues;
- Data capture and knowledge sharing; and
- Program guidance and support.

Featured under program guidance is IW:LEARN's Toolkit for Stakeholder Participation in Environmental Policy. The toolkit sets out:

- A framework and principles for working collaboratively;
- Approaches for identifying relevant stakeholders;
- Specific tools for different needs in stakeholder engagement; and
- Strategies for reaching agreements.

The Stakeholder Participation Toolkit was developed based on the lessons learned, best practices, and experiences gathered by Conservation International and partners in applying the Ocean Health Index (OHI) worldwide, with contributions from principles developed by the Consensus Building Institute.

The Toolkit can be accessed on the [IW:LEARN website](#).

**Source:** IW:LEARN website.

## 4.3 Stakeholder engagement in GEF governance

The updated Policy on Stakeholder Engagement sets out mandatory requirements for stakeholder engagement activities led by the Secretariat. These include national and regional activities under the Country Support Program and activities related to the development of policies, guidelines, and strategies (GEF 2017a). Commentary on the former is covered more fully in the IEO evaluation of the GEF Country Support Program (GEF IEO 2021). This section concentrates on the latter.

The Stakeholder Engagement Guidelines (GEF 2018a) specify that GEF policies, guidelines, and strategies drafted for Council approval are to be posted on the Council documents webpage for review. Channels for supplying feedback include: GEF Council Members directly, regional CSO representatives in the GEF-CSO Network, and the GEF website itself. Council meetings are webcasted live and posted to the GEF YouTube Channel. Council meetings are summarized in the International Institute for Sustainable Development's (IISD's) *Earth Negotiations Bulletin*.<sup>6</sup>

At its 50th meeting in June 2016, the GEF Council added a process that was discrete from though related to the development of the updated Stakeholder Engagement Policy. The Council established an ad hoc working group of members to develop an updated vision of the relationship between the GEF and civil society. This came in response to a recommendation to this effect contained in the IEO

evaluation of the GEF-CSO Network (GEF IEO 2016). Commentary on the formulation of this vision and the implementation that has occurred since is discussed in [chapter 5](#), as part of a follow-up briefing on the recommendations of the CSO Network evaluation.

Several provisions in the approved Updated Vision elaborated on the scope for CSO engagement in GEF governance:

- An affirmation of the GEF's continuing intent to provide civil society with opportunities to engage in the activities of the GEF partnership at all levels of the GEF's work
- Assignment to the GEF Secretariat of the role of selecting GEF-sponsored CSOs for Council consultations and meetings, transparently with criteria, in consultation with the GEF-CSO Network, OFPs, the Indigenous Peoples Advisory Group, and the GEF SGP, and with a view to engaging "voices of CSOs from the field, while (also) maintaining robust engagement on policy" (GEF 2017c, iv)
- A more rigorous structuring of Council-CSO consultations wherein the Council leads a consultative process to choose topics that can be addressed within half of the day-long agenda, leaving CSOs with the balance of time for their own purposes
- A relaxation of the Council meeting rule stipulating that CSOs are invited to speak only at the end of the agenda item and once Council members have spoken (GEF 2017c).

At 30 months since the Policy on Stakeholder Engagement came into effect, it is still early in implementation to be seeing patterns of impact on governance across the partnership and difficult, also, to establish measures of contribution. Over a 10-year period, CSOs as a proxy for civil society show rough consistency in their reported interactions with the GEF. Actual participation data

<sup>6</sup> As described on the [International Institute for Sustainable Development](#) webpage, the *Earth Negotiations Bulletin* team provides daily coverage at sustainable development negotiations and events around the world, documenting global efforts to tackle climate change, biodiversity loss, sustainable land use, safe chemicals management, deep sea mining, and other global challenges.

obtained by the IEO for the evaluation of the Country Support Program, show that actual growth in CSO participation in Country Support Program activities (National Dialogues and Expanded Constituency Workshops) is concentrated in the first two years of GEF-7 (i.e., 2018–20). Most notably, program data show that, overall, CSO participation in Extended Constituency Workshops increased from 12 percent in GEF-5, to 16 percent in GEF-6, to 40 percent so far in GEF-7, albeit with wide fluctuations from session to session (GEF IEO 2021).

[Figure 4.2](#) compares data from CSO survey data collected by the IEO in 2016 with that collected at the beginning of 2021. In both surveys, respondents were asked to report on their organization’s participation at key governance events. Respondents are segmented by their membership status regarding the CSO Network.

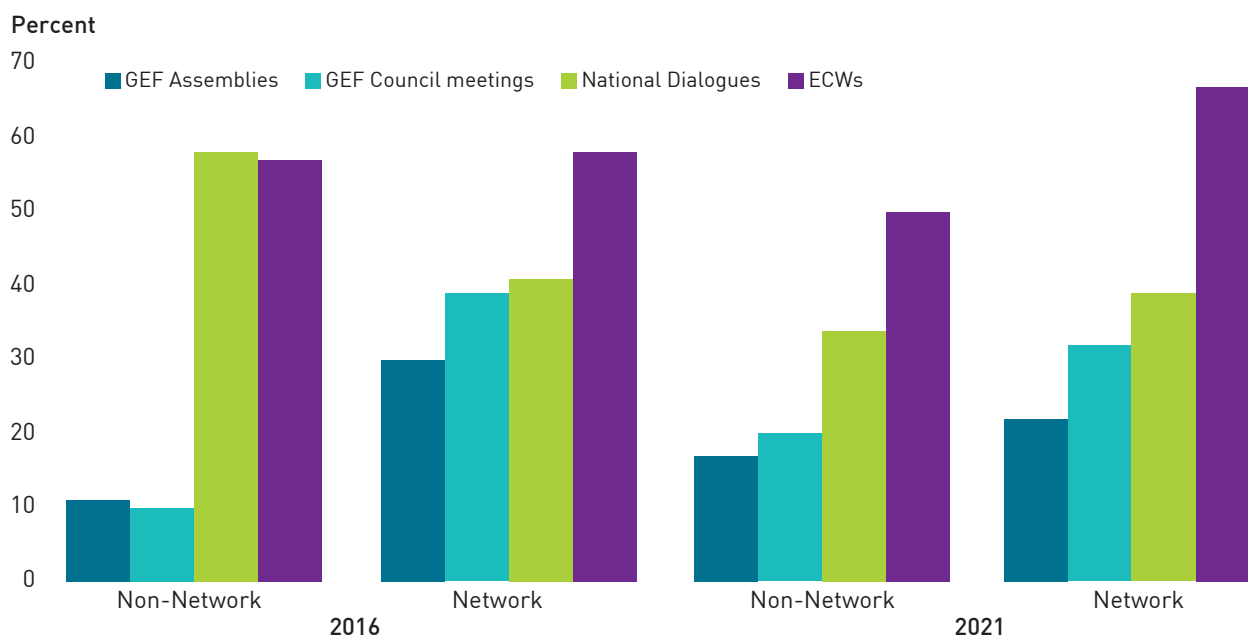
Not surprisingly, more Network and non-Network respondents reported greater participation in

national/regional gatherings (National Dialogues and ECWs) than for the global events, with ECWs being the venue with the highest levels of participation. With the COVID-19 pandemic, all but one of the planned 13 ECW events were canceled in 2020, suggesting that participation in this venue would otherwise have been higher still in relation to the others.<sup>7</sup>

Beyond the visible growth in ECW participation by Network members, the figure shows a minor

<sup>7</sup>In an online survey of the range of stakeholders involved in the GEF’s Country Support Program, CSO Network members and non-Network CSOs self-identified in a proportion similar to what is shown for National Dialogues and Expanded Constituency Workshops (2020) in [figure 4.2](#). Both cohorts were among the three most prominent among the survey respondents, the other self-identifying cohort being GEF focal points. The survey was sent to 5,653 individuals in September 2020 by Le Groupe-conseil Baastel Itée on behalf of the GEF IEO (GEF IEO 2021).

**Figure 4.2** Reported civil society participation in GEF events, 2010–15 and 2016–21



**Note:** 2016; non-Network  $n = 166$ ; Network  $n = 104$ . 2021; non-Network  $n = 90$ ; Network  $n = 157$ .

change in reported participation for this group over the two five-year spans. The picture differs among non-Network members. Here, the data show a decline in reported participation in ECW and National Dialogue activities over the 10-year period. Again, the effect of the pandemic is to be factored in for both segments, certainly for participation in ECWs and to a lesser extent for National Dialogue and Council meetings.

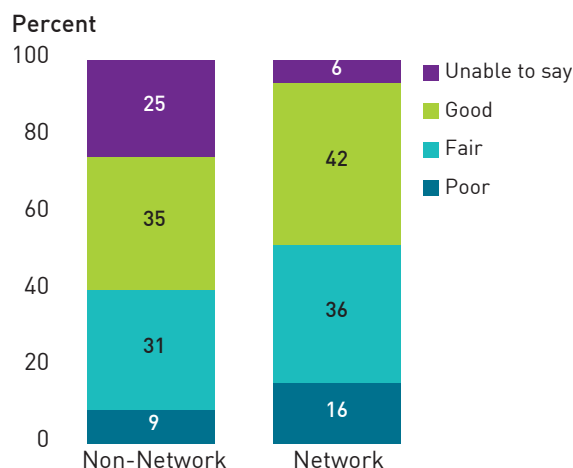
Regarding participation of non-Network CSOs in GEF events, an increase in reported participation in GEF Assemblies and in Council meetings may reflect the GEF’s more proactive stance under the Updated Vision in sponsoring CSOs for participation in these events regardless of whether they are members of the CSO Network or not.

The marked drop in reported participation in national dialogues might be explained by the decision in 2014 to integrate separate National Portfolio Formulation Exercises (NPFE) with the National Dialogues. Up to the beginning of GEF-6, countries were able to access GEF resources up to a \$30,000 limit to, among other things, convene relevant ministries and other stakeholders to provide input on decisions regarding GEF resource programming. A 2014 IEO review of the NPFE found that, among the 34 NPFEs carried out to completion (i.e., that produced a planning document), between 2010 and 2014, 22 involved consultations that engaged civil society (GEF IEO 2014).

In the IEO’s 2021 CSO survey, respondents mostly rated the GEF as “good” (39 percent) or “fair” (34 percent) in the way it engages with civil society in the formulation of policies, guidelines, and strategies. Slightly more than a quarter were either unable to say (15 percent) or rated the GEF as “poor” on this form of engagement.

[Figure 4.3](#) compares CSO ratings of GEF engagement on governance matters between CSO Network and non-Network members. A

**Figure 4.3** Ratings of GEF engagement with civil society in formulating policies, guidelines, and strategies, 2021



Note:  $n = 398$ .

larger percentage of CSO Network members rate the GEF in the “fair” to “good” range than is the case among non-Network CSOs (78 percent versus 66 percent). At the same time, a higher percentage of Network members rate the GEF as “poor” than is the case for non-Network members (16 percent versus 9 percent).

The lesser number of CSO Network members in the “unable to say” category likely reflects the closer proximity of CSO Network members to the GEF’s governance functions as participants in the GEF activities mentioned above or as recipients of information about GEF developments. This pattern is evident in the Costa Rica and Mozambique case studies where key informants who were CSO Network members were conversant with GEF’s Stakeholder Engagement Policy while non-Network members were not. As it happened, none of the eight CSO key informants reached in India and the Philippines (Network and non-Network affiliated) were familiar with the policy.

Asked broadly about trends in the way various GEF partners—Agencies, OFPs, GEF Secretariat staff,

the IEO and STAP—have engaged with civil society between 2016 and 2020, CSO respondents are varied in their answers on a scaler between “decreased” and “increased” to the extent that no discernible pattern of change can be detected with any partner.

From their vantage points in country government offices, OFPs see the updated Stakeholder Engagement Policy having the greatest influence on GEF’s engagement with their own stakeholder cohort, i.e., government officials (national and local). More than 90 percent of OFP respondents said the policy has resulted in their inclusion to a “great” (60 percent) or “moderate” (30 percent) extent.

Strikingly, OFP perceptions of the inclusion benefits brought by the policy to the intended stakeholder groups—civil society, indigenous peoples, women’s organizations, and the private sector—are less pronounced. One interpretation is that there is a variable understanding and recognition among OFPs regarding the centrality of nonstate-actor “stakeholders” to the policy. A contrasting interpretation is that OFPs perceive the task of building greater inclusion among stakeholders outside of government as more challenging and less productive in terms of results. The data tend to support the former more than the latter.<sup>8</sup>

<sup>8</sup> Threads to both explanations are found in other parts of the survey and in the review of portfolio documents (see [section 4.4](#)). Regarding the first, less than two-thirds of OFP respondents said they are partially (45 percent) or fully familiar (17 percent) with the policy’s requirements while the remaining respondents said that they are either, “briefed but not using policy (28 percent) or that they are, “not at all familiar with it” (11 percent). In addition, it has historically been a pattern to see national and local governments prominently in the mix of stakeholders according to the findings of the portfolio review. Regarding the second, most OFPs indicated that the task of ensuring meaningful inclusion across the key stakeholder groups featured in the policy is “easy” or “neither easy not difficult” (at least 70 percent combined). The most challenging group is said to be the private sector.

The view from inside the GEF Secretariat is that engagement in the development of policies, strategies, and guidance has varied on a case-by-case basis and that, to date, there is no standard engagement practice in place for the GEF. Thus far, the means by which the policy updates for stakeholder engagement and gender equality were formulated during GEF-6 are described as the most prominent examples of the application of a multi-stakeholder approach, and best departure from historic tendencies to formulate policy without engagement. A description of how the multistakeholder approach was used in the formulation of the updated Policy on Stakeholder Engagement is set out in [box 4.3](#).

**Box 4.3 A multistakeholder approach to policy development: the updated Policy on Stakeholder Engagement**

Taking up the recommendations of the GEF IEO’s Fifth Overall Performance Study and the CSO Network’s review of the Public Involvement Policy, the GEF Secretariat agreed in 2014 to establish the Working Group on Public Involvement.

The terms of reference for the Working Group stipulated a membership inclusive of: Council members, OFPs, representatives of the GEF-CSO Network, GEF Partner Agency staff, the GEF, and key GEF Secretariat staff. It anticipated an 18-month period to undertake assigned functions, which included a review of the policy and its associated guidelines, culminating in a draft report to the Council with recommendations.

Quarterly meetings (a mix of in person and virtual) were anticipated with an expected overall time contribution of 2 hours per month (plus 12 hours of in-person meeting time). Budget provisions were included to facilitate the participation of members from developing countries.

**Source:** Terms of Reference for the Working Group on Public Involvement.

## 4.4 Stakeholder engagement in GEF operations

The updated Policy on Stakeholder Engagement sets out mandatory requirements for stakeholder engagement throughout the GEF program and project cycles. In PFDs and PIFs, Agencies are to describe consultations conducted during project development and indicate how stakeholders are to be engaged throughout the program/project cycle. Later, at the CEO endorsement/approval stage, Agencies are to present stakeholder engagement plans that elaborate on and operationalize the details presented initially. These are to be assessed by the GEF Secretariat. Agencies are to oversee implementation as per the stakeholder engagement plan and include information on “progress, challenges and outcomes” in PIRs. Commentary on implementation is also to be included in mid-term reviews and terminal evaluations. To support stakeholder engagement, Agencies are to “propose and allocate adequate resources in their program and project budgets” (GEF 2017a, 10). And the GEF Secretariat is to “update and maintain publicly available and easily accessible program and project templates to support implementation” (GEF 2017a, 10).

This section examines progress made in the implementation of the policy by observing the documentation of the GEF program and project portfolio and by capturing the perceptions of relevant stakeholders.

### FINDINGS FROM PORTFOLIO REVIEW OF GEF STAKEHOLDER ENGAGEMENT PRACTICE

The evaluation reviewed a sampling of program and project documents for evidence that requirements of the Policy on Stakeholder Engagement are being met in the three stages of the project cycle: identification, design, and implementation. The method

**Table 4.4** Project cohorts defined for the portfolio review

Cohort	Defining characteristic
Cohort 1	CEO endorsed after 2014, still in implementation and subject to the antecedent Public Involvement Policy
Cohort 2	GEF-6, CEO endorsed after issuance of the updated Policy on Stakeholder Engagement
Cohort 3	GEF-7, CEO endorsed between July 1, 2018, and July 20, 2020

**Note:** The cohorts exclude projects under the Small Grants Programme and National Portfolio Formulation Exercise projects.

by which this was done is set out in the evaluation methodology in [section 2.3](#). In short, a random sample of 336 projects was drawn from a universe of 571 projects for this time period. A numeric breakdown of projects across these three cohorts is set out in [table 2.3](#). The cohorts are defined in [table 4.4](#).

The 2017 Policy on Stakeholder Engagement supersedes GEF’s 2012 Policy on Public Involvement. The later policy widens the scope of its predecessor with a policy focus on promoting the “inclusive and meaningful participation of stakeholders in GEF’s governance and operations” (GEF 2017a, 1). In their opening statements, both documents recognize the link between effective stakeholder engagement and country ownership, accountability for project outcomes, partnerships, and the utilization of stakeholder skills, knowledge, and experience to address the socioeconomic needs of affected people. And both policies commit the GEF to provide budgetary support for implementation. The updated policy differentiates itself from the original policy in by:

- Focusing attention on the activities of GEF Agencies and the Secretariat;
- Shifting from “should” language to mandatory language;

- Introducing minimum Agency standards for all Agencies;
- Setting out clear requirements for Agency and portfolio-level monitoring and reporting on stakeholder engagement; and
- Providing more specific, mandatory documentation requirements across the project cycle, with mention of the stakeholder engagement plan.

Table 4.5 shows what the reviewers were looking for across the stages of the project cycle, with regard to project reporting and evaluation.

### Key observations

Analysis of portfolio documents yields the following key observations regarding the influence of the updated policy on Agency practices:

- The requirements of the updated Policy on Stakeholder Engagement are evident in reporting, though many were also evident to a lesser degree in project documents as per the

nonmandatory provisions of the predecessor Public Involvement Policy.

- Stakeholders are more engaged at the design stage and activities are explained more thoroughly at this stage as compared with the earlier identification stage of the project cycle. This practice is strengthened with the introduction of the updated policy.
- With the introduction of the updated policy, the types of stakeholders named at the identification and design stages of the project cycle have broadened from national governments, international organizations, and the private sector to include NGOs and CSOs.
- Inclusion of a stakeholder engagement plan is evident in more projects at CEO endorsement, though information on how these are to be shared is missing or vaguely stated.
- Local actors such as NGOs, CSOs, and local communities show a higher level of engagement following the launch of the updated policy.

**Table 4.5 Search items for the portfolio review on stakeholder engagement**

Project cycle stage	Requirement	Information sought in portfolio review
Identification	<ul style="list-style-type: none"> <li>• Affected and participating stakeholders</li> <li>• Consultations conducted during project development</li> <li>• Intention toward engagement throughout the project cycle</li> </ul>	<ul style="list-style-type: none"> <li>• Named?</li> <li>• Types of stakeholders named?</li> <li>• Conducted?</li> <li>• Types of consultations named?</li> <li>• Evidence of intent to engage?</li> </ul>
Design—CEO endorsement	<ul style="list-style-type: none"> <li>• Affected and participating stakeholders</li> <li>• Consultation/engagement to date and intended</li> <li>• Stakeholder engagement plan</li> <li>• Reference to higher-level GEF outcomes</li> </ul>	<ul style="list-style-type: none"> <li>• Identified by name or group?</li> <li>• Explained?</li> <li>• Prepared?</li> <li>• Shared?</li> <li>• Patterns of referencing?</li> </ul>
Implementation	Information on progress and challenges in PIRs	<ul style="list-style-type: none"> <li>• Included?</li> <li>• Referenced to plan?</li> </ul>
Reporting and evaluation	<ul style="list-style-type: none"> <li>• Options to include participatory monitoring</li> <li>• Degree and manner of involvement</li> </ul>	<ul style="list-style-type: none"> <li>• Instances cited?</li> <li>• Evidence in terminal evaluations?</li> </ul>
Overall	<ul style="list-style-type: none"> <li>• Stakeholder engagement practice</li> <li>• Budgets to cover policy requirements</li> </ul>	<ul style="list-style-type: none"> <li>• Alignment with definition of “meaningful engagement” in updated policy?</li> <li>• Included?</li> </ul>

- Documentation of stakeholder engagement activities in implementation has been consistently high, possibly helped by the introduction of the policy.
- Evidence of stakeholder engagement in program or project governance or in project monitoring and evaluation has been consistently limited and largely without reference to the stakeholder engagement plan.
- While theory-based connections are frequently made between stakeholder engagement activities and higher-level project and GEF outcomes (notably to address the socioeconomic needs of stakeholders or to enhance country ownership), there is a limited amount of data to show the contributions of one to the other.
- Evidence of the availability of budgetary support for stakeholder engagement activities is consistent across the portfolio.

### Identification: PIF stage

In the project identification stage, documentation for almost all (>90 percent across the three cohorts) projects identified groups with a stake in the project. These are groups slated to participate in implementation and/or likely to be affected by project activities and results. There is little variance across the three cohorts of projects indicating that this practice was also common under the predecessor Public Involvement Policy, where the practice was encouraged, but not mandated.

Stakeholders most typically named in the first cohort of older 2014–18 projects under GEF-6 are national governments, international organizations, and the private sector. This changes in the subsequent cohorts of GEF-6 and GEF-7 projects funded after the launch of the new policy, with a notable increase in the identification of NGOs/CSOs, local communities, and the private sector.

Regarding the 2018 requirement that project documentation indicate whether consultations were carried out, the practice was evident prior to the launch of the new policy though its prevalence increased significantly in the latest cohort of (GEF-7) projects (those signed between July 1, 2018, and July 20, 2020). 60 percent of cohort 3 projects submitted this detail in their PIFs, a significant increase on the prevalence found in cohort 1 and 2 projects (in cohort 1 projects, the prevalence was 22 percent). Two-thirds of these projects went no further in specifying the type of consultation, while the remainder distinguished equally between use of meetings and interviews.

Project documents showed a stable trend in the presence of information describing intent to engage throughout the project cycle. Across the three cohorts, just under half of the projects showed evidence of having an engagement plan though in most instances without giving specifics (e.g., type of engagement or timing).

### Design: CEO endorsement stage

In the design stage that culminates in CEO endorsement, the updated policy requires that project documentation identify stakeholders engaged, by name or group. The review found a high (>94 percent) prevalence of projects identifying stakeholders in this way across all three project cohorts.

Requirements further state that the proponent Agency provide evidence that they have engaged stakeholders. Evidence is available in 70 percent of cohort 1, 84 percent of cohort 2, and 87 percent of cohort 3 projects, showing, as above, that this practice was evident prior to launch of the 2018 policy and has been increasing since its introduction. At this later stage in the project cycle, the stakeholder groups identified most are national governments, NGOs/CSOs, and international organizations. Consistent with the identification stage,



NGOs/CSOs gain prominence with the introduction of the updated policy. Other groups with rising profiles include local communities, the private sector, and academia. By contrast, while 3 percent of projects identified persons with disabilities as relevant stakeholders in their design documents, the review found no reporting on actual engagement with this group.

More projects distinguish the types of consultation taking place at this stage than is evident in the identification stage. Mentions among cohort 3 projects, in order of frequency, are: meetings (50 percent), workshops (30 percent), field visits (15 percent), assessments/surveys (15 percent), interviews, and focus groups.

Switching to a planning perspective, the portfolio review looked for evidence that projects describe how stakeholders will be consulted with and engaged in the project cycle. Again, there is evidence of actual consultation across the three cohorts and the frequency is consistently higher at this mature stage in the project cycle. Between two-thirds and three-quarters of projects described intent to engage stakeholders across the three cohorts. By contrast, the extent to which this happens is less than half at the identification stage.

Inclusion of a formal stakeholder engagement plan, as specified in the policy, is evident in 79 percent of cohort 1, 92 percent of cohort 2, and, at the time of the review, 85 percent of cohort 3 projects (submission of additional stakeholder engagement plans is anticipated from this latter cohort). Indications of whether and how stakeholder engagement plans are shared are vague, however. With the data provided, the review team was unable to see the extent to which stakeholder engagement plans are disseminated proactively and in language-appropriate ways.

The review found that, more often than not, across the three cohorts project design documents made

some reference to higher-level GEF outcomes associated with good stakeholder engagement practice, such as socioeconomic needs met, enhanced country ownership, and stakeholder needs/capacities enhanced. Prevalence of this increases for cohort 2 and 3 projects.

### Implementation stage

The portfolio review examined cohort 3 PIRs for patterns of reporting on progress, challenges, and stakeholder engagement outcomes. PIR templates include a section on stakeholder engagement and in all cases these sections were completed. The review team observed, however, that the narratives do not attempt to report against the stakeholder engagement plan, nor is there any explicit instruction to that effect on the template.

Reporting on implementation is also evident (indeed prominent at >85 percent) in cohort 1 and 2 projects even though progress reporting was not a requirement under the earlier policy. Here, too, it is carried out without reference to the stakeholder engagement plan.

There is little evidence in the portfolio that the level of Agency given to stakeholders in the identification and design stages is continued in implementation. References to stakeholder participation in project governance or in project monitoring are sparse, particularly as it pertains to stakeholders at the community level (e.g., indigenous peoples, women, disabled persons, community-based organizations).

### Reporting and evaluation stage

The 2018 policy encourages the use of “participatory monitoring” that involves stakeholders. The review team examined cohort 3 projects for references to the use of this practice. Mention was made in 22 percent of the projects. Civil society engagement in project monitoring is also encouraged in

the antecedent Public Involvement Policy guidelines and evidence of the practice also shows in cohort 1 and 2 projects, though to a slightly lesser extent.

Terminal evaluations of projects are to provide commentary on the degree and manner of involvement of CSOs and other stakeholders, including indigenous populations. The review team was only able to find eight terminal evaluations across the three cohorts, all of which pertained to cohort 1 projects. 6 reports (75 percent) referenced stakeholder engagement but, in the absence of any specific evaluation question on the subject or any indicators to guide data collection, the narratives were sparse and disparate.

#### **Box 4.4 Definition of meaningful consultation in the Stakeholder Engagement Guidelines**

Meaningful consultation and participation is a two-way process that:

- Begins early in the project identification and planning process to gather initial views;
- Encourages stakeholder feedback and engagement in the project development and design process;
- Continues during the development and implementation of a project;
- Is based on the prior disclosure and dissemination of relevant, transparent, objective, meaningful, and easily accessible information in a timely manner;
- Considers and responds to feedback;
- Supports active and inclusive engagement with parties affected by the project;
- Is free of external manipulation, interference, coercion, discrimination, and intimidation; and
- Is documented and disclosed.

Source: GEF 2018a.

In their overall examination of the portfolio, the review team checked for consistency between actual stakeholder engagement practice and the elements of “meaningful consultation” described in the policy and set out in [box 4.4](#). The three most commonly referenced items were: different categories are represented and involved; the consultation process is ongoing and iterative; and the process is equitable and nondiscriminatory and ensures that vulnerable groups (e.g., women, the poor) are given a voice.

Fewer than 10 percent of all projects described “stakeholder engagement” as a success factor in project implementation in their latest reports. Descriptors of this include: “good participation,” “high commitment and ownership,” and involvement of ground-level stakeholders. Conversely, more than a quarter of projects describe the absence of optimal stakeholder engagement, occasioned by context or project-level circumstances. The COVID-19 pandemic is the most prominent among the hindrances.

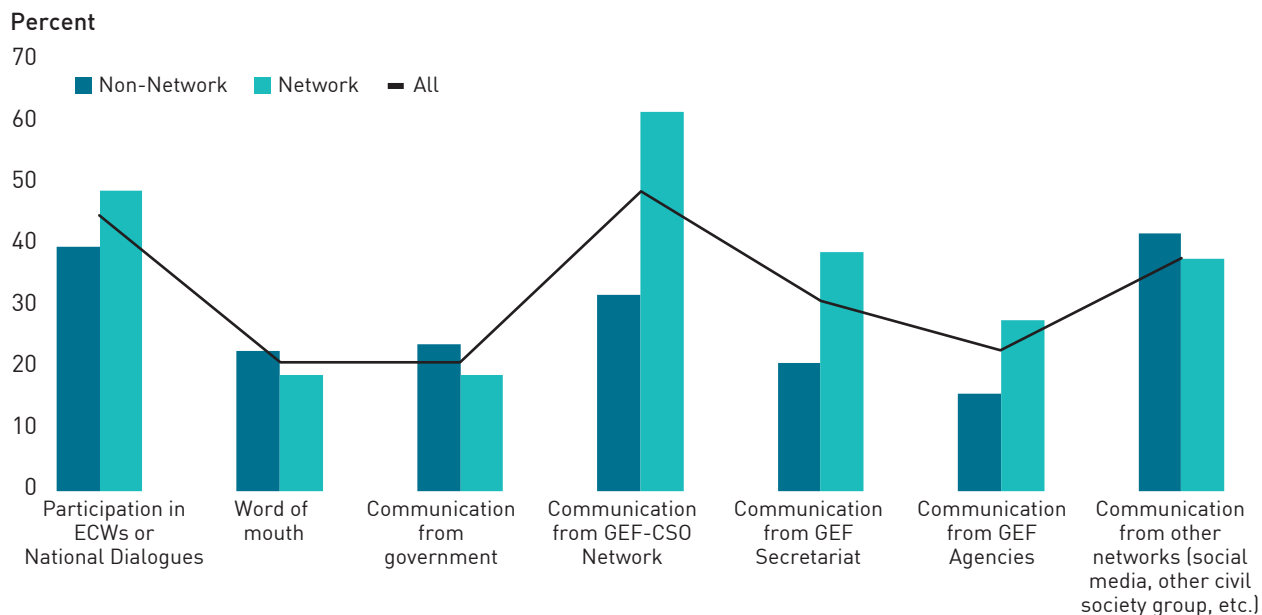
The review team also looked for evidence that budget provisions were in place to cover stakeholder engagement activities (i.e., funding for consultations, staffing, training/capacity building, and knowledge management or communications resources). Here, the team found greater than 95 percent prevalence of budgetary support across the three cohorts, but no basis to assess the adequacy of allocations.

## **STAKEHOLDER PERSPECTIVES ON THE GEF’S ENGAGEMENT PRACTICE**

### **Civil society perspectives**

Overall, the data suggest that for CSOs, information about engagement opportunities is more likely to come laterally from within civil society or from the GEF, than it is from government or GEF Agencies.

**Figure 4.4** CSO reported ways of learning about engagement opportunities in GEF programs and projects



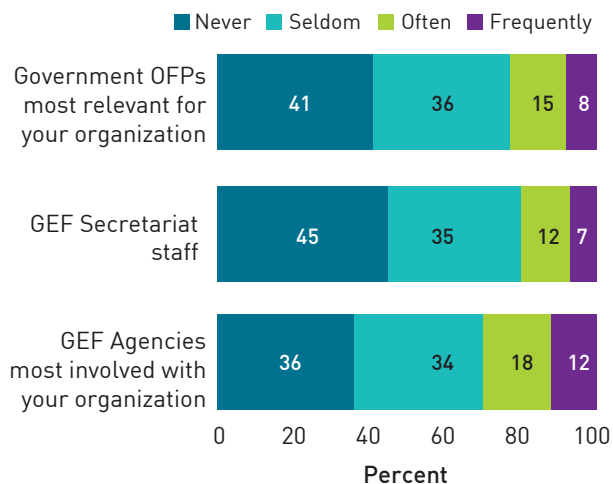
Note:  $n = 408$ .

The line in [figure 4.4](#) represents the reporting of all CSO respondents regardless of membership status in the GEF-CSO Network. The three most popular sources of information for CSOs on how to get engaged in GEF projects and programs are the CSO Network, the expanded constituency workshops, and other networks (including social media and other civil society groupings).

At the same time, CSO relationships in the partnership most pertinent to the Stakeholder Engagement Policy are those with GEF Agencies and with country government focal points (OFPs). These actors are most closely associated with the design and implementation of GEF programs and projects. Yet, a minority of CSOs in the survey reported learning about stakeholder engagement opportunities via this channel.

[Figure 4.5](#) shows that, in aggregate, CSOs engage most intensively with GEF Agencies, though that level of intensity is modest. Most respondents (70 percent) report being engaged with GEF

**Figure 4.5** CSO-reported frequency of interaction with selected actors in the GEF partnership



Note:  $n = 395$ .

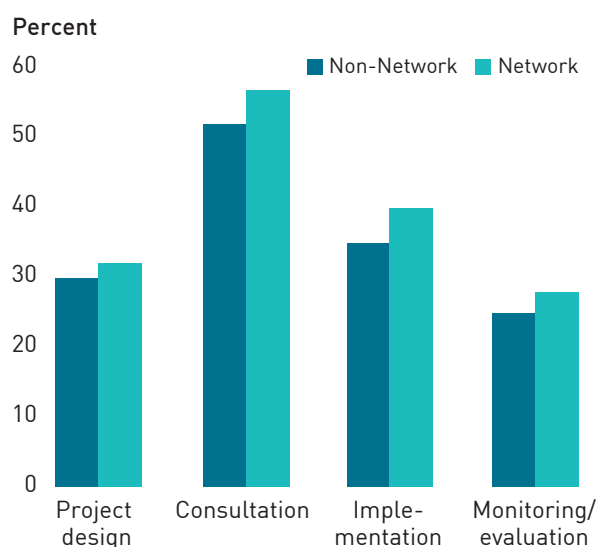
Agencies every six months or less, and more than a third indicate that they have no interaction at all. About 12 percent of respondents say that they maintain frequent interaction with Agencies (i.e., once per month or more).

In the survey, there is no discernible engagement trend in the five-year span that includes the introduction of the Stakeholder Engagement Policy. Data from the 2016 evaluation, which casts back to 2010, tell a similar story. In both instances, engagement trajectories are increasing, decreasing, variable, and unchanging in roughly equal measure.

About half of CSO respondents said they had been consulted in relation to a program or project over the past five years. There is minor variation here between Network and non-Network CSOs and the pattern of consultation is consistent with that found in the 2016 survey. Engagement is greatest at the beginning stages of the program/project cycle, the surveys indicate.

Understanding “engagement” to encompass interaction as an organizer and as a participant, [figure 4.6](#) suggests a greater degree of engagement in those stages prior to CEO endorsement.

**Figure 4.6 Civil society engagement in GEF programs and projects by type of activity, 2016–21**



**Source:** GEF IEO 2016 and 2021 e-surveys.

**Note:**  $n = 402$ .

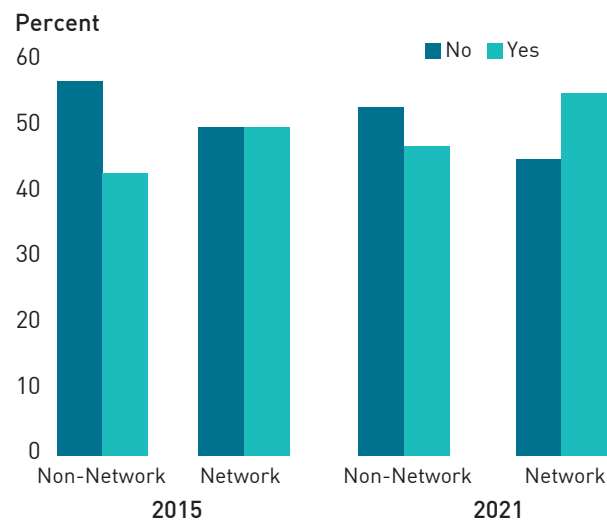
As shown in the portfolio review, it is in the identification and design stages where consultation activities are concentrated. This is echoed in the findings of the Costa Rica and Mozambique case studies carried out in support of this evaluation. In the latter study, key informants observed that barriers to greater CSO engagement in the project cycle hinge on the need for specific project management competencies, particularly in monitoring and evaluation.

As the GEF’s unique funding window for CSOs since its launch in 1992, the UNDP-administered Small Grants Programme (SGP) is not surprisingly the means by which most CSOs engage with the GEF. Today, the program operates in 126 countries and across all GEF focal areas, administering grants of up to \$50,000. By far the largest proportion of the 2021 CSO survey respondents (80 percent) identified the SGP as a point of connection to GEF operations. Full-size projects, medium-size projects, and enabling activities were each identified by fewer than 20 percent of respondents. The pattern is similar in the 2016 CSO survey carried out by the IEO and consistent between CSO respondents identifying as CSO Network members and those that do not.

[Figure 4.7](#) shows the breakdown of CSOs—Network and non-Network members—reporting the submission of funding proposals to the SGP over the two five-year increments of the last decade (i.e., 2010–15 and 2016–21).

The pattern of engagement between CSOs and OFPs is similar. As shown in [figure 4.5](#), most CSO respondents (77 percent) said they engage with their OFP once every six months or less, and nearly half said they have no interaction at all. Exceptions are rare in the survey but the evaluation encountered at least two country cases among key informants—Trinidad and Tobago and Costa Rica—where CSOs are engaged on a regular and substantive basis. The latter case is described in [box 4.5](#).

**Figure 4.7** Submission of funding proposal to SGP, 2010–15 and 2016–21



Source: GEF IEO 2016 and 2021 e-surveys.

As with the engagement patterns observed between Agencies and CSOs, no discernible trend is evident in the frequency of interaction between CSOs and OFPs in the period 2016–21. Here too, the pattern is consistent with data from the 2016 evaluation.

CSOs also maintain a relationship with the GEF Secretariat, in particular, the GEF Secretariat’s Partnership Team. As above, most CSO respondents (80 percent) report being in touch with the Secretariat once every six months or less, and nearly half said they have no interaction at all. Again, no discernible trend is evident over the past five years and the same pattern of response is evident in the 2016 CSO survey.

Most CSOs range between “good” and “fair” in their rating of the GEF’s engagement with civil society. Less than a quarter of respondents assess the engagement as “poor.”

Opinion on the quality of GEF engagement is divided in much the same way in relation to the design and implementation stages of the project cycle as shown in [figure 4.8](#). For both stages, a

**Box 4.5** Civil society-government engagement in Costa Rica

In Costa Rica, the government-civil society relationship is defined in national legislation and a diverse range of CSOs flourish in the country. Currently, the largest civil society platform in the country is the Citizen Consultative Council on Climate Change (5C), created by the government to engage national stakeholders on Costa Rica’s [National Decarbonization Plan](#).

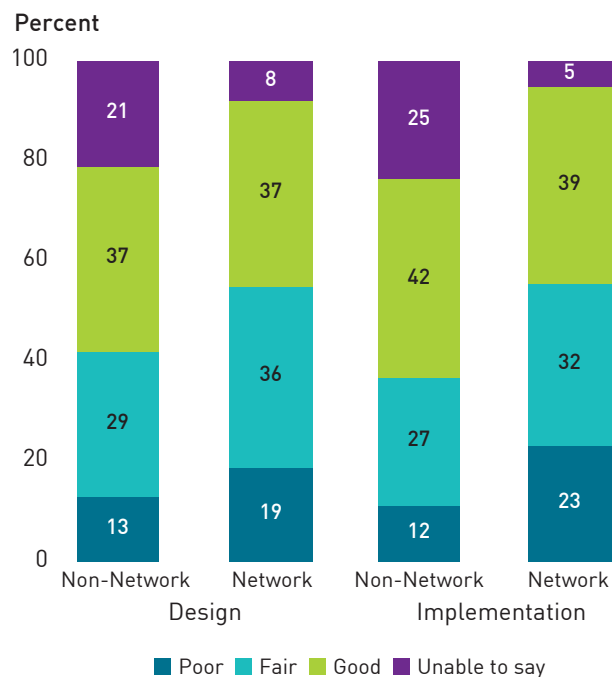
Under the plan, several channels exist for integrating civil society in national planning including that pertaining to the use of GEF funds. Opinion among CSOs is that the civil society-government relationship is strong, but could be even stronger were the Council to agree on a strategic plan and develop greater continuity in the Council governance mechanism. Stronger coordination among CSOs themselves would also help, according to the CSO representatives interviewed for the Costa Rica case study associated with this evaluation. As it stands, the GEF-CSO Network comprises a relatively small number of active CSOs. At present, the Network is not itself engaged with the 5C.

Sources: Costa Rica case study; [International Centre for Non-Profit Law, Costa Rica](#).

larger proportion of non-Network members were unable to give an opinion. This might indicate lesser engagement overall and/or less well-defined expectations regarding how stakeholders might be engaged in GEF program and project activities. The survey also indicates that ratings are consistent regarding the quality of engagement across key stakeholder groups, including civil society, women’s groups, and indigenous people. For the private sector, there is a greater degree of uncertainty.

CSO respondents want to see the GEF intensify and broaden its communication with CSOs (17 percent of comments). This message is particularly evident

**Figure 4.8** Ratings of GEF engagement with civil society in project design and implementation



Source: GEF IEO e-survey.

Note:  $n = 398$ .

from CSOs currently outside of the CSO Network. Most frequently mentioned is the idea of a newsletter/newsfeed; stronger two-way communication is also a priority. More attention is asked of the GEF regarding communication at the country/regional level. Suggestions include: encourage information flow with government offices, promote better communication through Agencies, create national feedback portals, and use popular media (radio, social media) and media personalities to bring key messages to new audiences (table 4.6).

CSO respondents want to focus the GEF's engagement efforts at the national level (18 percent of comments). Reaching the grassroots, bridging across focal areas, connecting between the NGO and private sectors, and utilizing preexisting and new country/regional channels to connect stakeholder groups were identified as priorities.

CSO respondents seek greater inclusion in funded activities (13 percent of comments). Widening and simplifying access to funding opportunities—both CSO led and those governed under the System for Transparent Allocation of Resources (STAR) allocation—and finding ways to graduate CSOs that have proven themselves to be successful through small grants funding are identified as priorities. Youth, indigenous peoples, and women were identified for attention.

CSO respondents seek GEF support for capacity development (5 percent of comments). Here, respondents who were CSO Network members were at least twice as likely as non-Network members to mention capacity development as an area for the GEF to consider regarding engagement with civil society. Again, the focus of comments is on country-level engagement with increased use of online training, local networks for spread effect, and use of small grants. GEF Agencies were also mentioned for their potential to support capacities of newer, less-experienced CSOs. Key informants within GEF Agencies mentioned role shadowing as a particular mode of capacity development.

### Government focal point perspectives

From the vantage of the OFP, application of the updated Stakeholder Engagement Policy has resulted in the inclusion of stakeholders in GEF programs and projects though, as above, it has been to varying degrees across stakeholder groups.

As shown in figure 4.9, OFP survey respondents were most inclined to name government officials (local and national) as the most included, followed by civil society and women's organizations, and then by indigenous peoples and local communities. This is consistent with the earlier finding indicating that, on governance matters as well, OFP respondents see the influence of the policy on government officials (local and national) to be as strong or stronger than it is on nonstate actors.

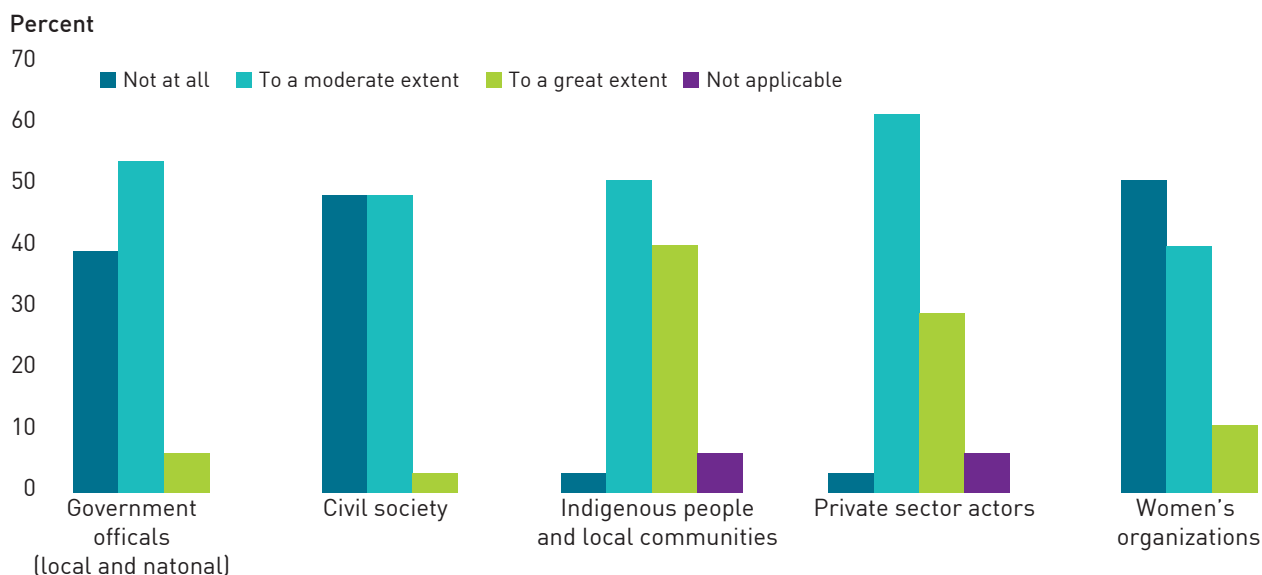
**Table 4.6 CSO respondent suggestions to reinforce or strengthen GEF engagement with civil society**

GEF communications with CSOs (17% of comments)	GEF engagement with CSOs/ IPOs/ women's organizations (18% of comments)	GEF funding support/ SGP (13% of comments)	GEF support for CSO capacity development (5% of comments)
<ul style="list-style-type: none"> <li>• More frequent, targeted information directly to CSOs in country (urban and rural), e.g., monthly newsletter, consultative meetings, national feedback portals</li> <li>• Expand communications online to improve reach</li> <li>• More emphasis on popular messaging that promotes positive role/ contributions of civil society</li> <li>• Support better communications with the GEF-CSO Network regarding membership/ accreditation, activities</li> <li>• Guidance to government focal points and Agencies around CSO engagement</li> </ul>	<ul style="list-style-type: none"> <li>• Focus on national structures and processes (e.g., national dialogues, SGP steering committees, new multistakeholder forums)</li> <li>• Target local organizations working directly with communities</li> <li>• Identify proven SGP CSOs; draw them into project review/ advisory roles</li> <li>• Foster lateral links among CSOs across focal areas</li> <li>• Establish links with the private sector</li> <li>• Act deliberately to engage CSOs in program outcomes, i.e., as supportive resources</li> </ul>	<ul style="list-style-type: none"> <li>• Widen access to SGP (larger funding allocations; simplified procedures; affirmative action for indigenous peoples organizations, women's organizations, and youth)</li> <li>• Graduate SGP recipients into larger-scale opportunities</li> <li>• Create more roles/ opportunities for CSOs within MSPs and FSPs</li> </ul>	<ul style="list-style-type: none"> <li>• Country-level targeting</li> <li>• Online options (expanded access)</li> <li>• Grants/financial support for the smaller/less experienced CSOs</li> </ul>

Source: GEF IEO e-survey.

Note: n = 442; nearly 70 percent of respondents (307 of 442) had comments. FSP = full-size project; IPOs = indigenous peoples organizations; MSP = medium-size project.

**Figure 4.9 GEF operational focal point assessment of the influence of the 2018 Policy on Stakeholder Engagement on particular stakeholder groups**



Source: GEF IEO e-survey.

Note: n = 31.

## Agency perspectives

At least half of Agency key informants described a “nudging” effect that the 2018 Policy has had on their institutional practices and culture. For some, the policy has given impetus to review and revise their own policies. For the younger and newer Agencies this has been important in positioning for the purpose of accessing additional climate financing. It has also been important in deepening understanding of key stakeholder engagement concepts, including how to discern among and work with CSOs and how to engage with indigenous peoples.

This is resulting in programming changes both within and beyond the GEF portfolio. In one instance, an Agency’s increased readiness to undertake engagement activities has sparked interest in engagement as a means of risk mitigation among associated national development banks. At least three Agencies reported that the policy has served as a point of reference in leveraging decision makers within implementing bodies and government authorities to go beyond lesser national standards or common practices.

Agencies described patterns of engagement with CSOs at a global/regional level and in relation to individual programs and projects. For those with active CSO partners at the higher level, engagement tends to occur with large-scale NGOs or industry associations with complementary mandates. These “partnerships” are informed by strategy and firmed up through agreements and with action plans and systems of monitoring and reporting.

Most Agency key informants indicated that it is early days to assess ground-level influences of the updated policy, at least in a systematic way. There is, however, a high level of confidence among them that, as one bank informant put it, “the more we are able to speak with actors the better able we are to

avoid risk.” Across the Agencies, this confidence reportedly emerges from a combination of anecdotal and more rigorous impact studies. One NGO Agency mentioned that it was, “looking to do more studies linking engagement practice to project outcome,” indicating not so much that the link needs to be established, but more that it is about understanding its dimensions and possibilities.

The Costa Rica case study carried out as part of this evaluation encountered a GEF-financed project that has successfully brought rural community stakeholders (including marginalized groups) into governance committees to manage, operate, and develop systems of aqueducts and sewers.<sup>9</sup> The Mozambique case study encountered a project that is engaging communities in conservation co-management to help address persistent wildlife crime and uncontrolled subsistence farming in the Gorongosa area.<sup>10</sup> [Box 4.6](#) illustrates at a community level the value addition of dialogue across stakeholder lines.

Known determinants of effective stakeholder engagement practices at the project level are set out in [box 4.7](#).

## 4.5 Summary

- Overall, GEF Agencies describe the updated policy as well designed, that is, clear in meaning

<sup>9</sup> Strengthening Capacities of Rural Aqueduct Associations (ADADAS) is a GEF-6 full-size project (GEF ID 6945) implemented by UNDP with the NGO Cedarena. See AyA (2013).

<sup>10</sup> [Strengthening the Conservation of Globally Threatened Species in Mozambique through Improving Biodiversity Enforcement and Expanding Community Conservancies around Protected Areas](#) is a GEF-6 full-size project (GEF ID 9158) implemented by UNDP with the National Agency for Conservation Areas under the Ministry of Land, the Environment and Rural Development; Gorongosa Restoration Project; and Wildlife Conservation Society.



#### Box 4.6 The Amazon watershed in Ecuador

The Andes Adaptation to the Impact of Climate Change on Water Resources Project (AICCA; GEF ID 5384) is a GEF-5, full-size project implemented by Corporación Andina de Fomento (CAF) in partnership with the governments of Bolivia, Colombia, Ecuador, and Peru (ministries of environment) and other parties.

The project's areas of intervention in Ecuador include the Cayambe Coca National Park and the Machángara River Basin and watershed within the Cajas National Park, both biodiversity hotspots in the upper broader Amazon watershed.

This area is facing climate change, affecting the distribution of species and the frequency and magnitude of floods, droughts, and diseases. At the same time, illegal commercial hunting for wild meat, the advancement of agriculture, and improper or illegal extraction of timber are reducing globally significant biodiversity. Pressures are felt through road construction, population growth, illegal settlement within protected areas, and the development of hydroelectric power as a national priority.

Conservation efforts with and between the local stakeholders have been compromised through a lack of organization, poor communication among key local stakeholders, and a variable degree of acknowledgment among authorities of the link between extreme weather events and the climate change phenomenon.

**Source:** Project documents.

AICCA supported the establishment of a stakeholder committee in two locations (Cuyuja and Papallacta) within Cayambe Coca National Park to: raise awareness on climate change and its effects on productive sectors; support the prioritization of adaptation measures to be implemented at each locality; and enhance a coordinated response among local stakeholders to climate change and variability.

Actions taken to create this committee included:

- Participatory dialogues to understand distinct stakeholder interests and interactive effects and larger ecosystem trends related to climate change;
- A four-day study exchange with peers from the long-established and high-functioning Machángara River Basin Conservation Committee which included observation of the Committee's annual operational planning exercise; and
- A report back by delegates to stakeholders in Cuyuja and Papallacta and subsequent agreement to create a similar governance structure of their own.

Since the formation of the committees in Cuyuja and Papallacta, stakeholders have agreed on adaptive measures and conservation actions to address extreme weather hazards. This includes a new working arrangement between the local hydroelectric power project and communities within its buffer zone. Parties routinely meet to talk about project developments, including climate actions.

and intent, and with requirements that are realistic and appropriate.

- The way the GEF defines stakeholder engagement and sets out policy requirements is mostly consistent with the practices of comparator institutions.
- Across the Agencies, Stakeholder Engagement Policy content is incorporated uniquely with varying degrees of integration of gender and

safeguards content, and with varying degrees of emphasis placed on "risk" and "rights." Thresholds for making compliance adjustments to their own policies vis-à-vis the GEF policy are generally higher in Agencies with larger GEF portfolios relative to the Agency's total portfolio.

- In the main, Agency reporting guidelines are described as clear, generally compatible with own practices, useful, and not

#### **Box 4.7 Determinants of effective stakeholder engagement practice from an Agency vantage point**

- Use of the Stakeholder Engagement Policy as a frame of reference
- Use of technically competent and culturally attuned consultants (integrated gender and engagement perspective preferred)
- Sufficient upfront time in the project cycle
- Careful identification of stakeholder groups (e.g., stakeholder mapping)
- Facilitated multistakeholder dialogue and agenda setting for the project cycle
- A shared engagement plan, with targets and measures, and linked to larger (sustainability) outcomes
- “Protections” vs “livelihoods” tensions addressed, not avoided
- Alternative knowledge systems utilized
- Active exposure and cross-learning among stakeholder groups (action-reflection)
- Documentation contextualized, structured for analysis at multiple scales, and validated

**Source:** Compiled from interviews with GEF Agency key informants in Costa Rica, India, Mozambique, and the Philippines.

onerous. Agencies newer to more complex social/environmental programming are more likely to seek additional guidance. The portal is mostly described as “getting better” though with limitations remaining.

- Uniformly, Agencies assess the one-to-one support provided by the Secretariat as very satisfactory—attentive and substantive. One critique, heard frequently, described a “piecemeal” pattern of requests and feedback. Policy-related support provided through training/orientation is described as adequate though not developed enough to provide deeper, role-specific understanding of policy implementation. Agency

“demand” for policy-related training or knowledge sharing is variable for the reasons noted above. What is clear is that some Agencies have stakeholder engagement expertise to share, while others seek it. In this mix, the GEF is seen as well placed to be an information and relationship broker.

- Constraints in implementation are noted by the Agencies in three areas: internal (Agency/project team) experience/capacity to integrate “meaningful” stakeholder engagement into design and implementation; inadequacy of budget and time to undertake quality stakeholder engagement; and the prevailing social/political context in some countries. The first points to knowledge/attitude gaps within the partnership. Knowledge/expertise is not evenly distributed within and among Agencies and within the consultant community. The second points to a tension between Agencies and the GEF on expectations each has of the other regarding contribution to the effort. The third constraint points to factors further toward the edge of GEF’s sphere of influence that have much to do with country ownership.
- There is uncertainty among a significant proportion of OFPs as to what is expected of them in supporting any of the three policies, including the one on stakeholder engagement.
- Familiarity with the updated policy is also mixed across the vast array of GEF-affiliated CSOs. The majority of those surveyed indicate “some” familiarity, and CSO Network members are more inclined than their non-Network peers to know the policy.
- The updated Policy on Stakeholder Engagement together with the Updated Vision to Enhance Engagement with Civil Society have given the Secretariat a more proactive stance as a facilitator of stakeholder engagement on governance matters. Views are mixed on the merits of this change.

- Patterns of civil society participation in GEF governance have not changed very much over a 10-year period. Consistently, CSO Network members show a greater likelihood of participation in GEF events than those not identifying with the Network. Ratings by CSOs of the GEF's performance engaging civil society in governance are mostly distributed across the "fair" and "good" categories on a three-point scale, with no discernible pattern of change indicated over the past five years.
- The view from inside the GEF Secretariat is that engagement in the development of policies, strategies, and guidance has varied on a case-by-case basis and that, to date, there is no standard engagement practice in place for the GEF. That said, there is a discernible movement toward a multistakeholder approach as optimized in the policy revisions for stakeholder engagement and gender equality during GEF-6.
- Examination of the GEF program and project portfolio back to 2014 shows evidence of adherence to the requirements of the updated policy and greater attention to stakeholder engagement practice in GEF-funded programs and projects, though gaps remain. Policy requirements cover the full project cycle but are front loaded to CEO endorsement. As a result, at the portfolio level, documentation tends to be compliance/risk focused and anticipatory of results. Pathways/indicators are not defined, program/project templates are "open ended" in their requests for information, and understanding is anecdotal on how the policies contribute to impact across the focal areas.
- CSOs surveyed showed that they are more likely to obtain information about engagement opportunities from their peer organizations and networks or through GEF mediated events (e.g., Expanded Constituency Workshops) than they are from Agencies or governments. For most, interactions with Agencies and governments (OFPs) are seldom (every six months or less), if at all.
- Patterns of interaction between the GEF Secretariat, Agencies, and OFPs have not changed appreciably over the past 10 years. Engagement with CSOs mostly occurs in the opening stages of the project cycle. Not surprisingly, the vast majority of CSOs (Network and Non-Network) engage with the GEF through the SGP. Most CSOs rate GEF's stakeholder engagement in programs and projects in the "fair" and "good" categories on a three-point scale, with no discernible pattern of change indicated over the past five years.
- Agencies describe an internal "nudging effect" from the introduction of the updated policy. It has provided impetus to review and revise their own policies and to deepen the thinking across staff on the practice itself. Having a stronger policy has also helped the new GEF Agencies to leverage decision makers in implementing bodies and within governments to go beyond (lesser) conventional practices and/or national standards.
- Although there are accounts of robust stakeholder engagement, as shown in the portfolio review, the documentation of impact is limited and done mostly at a program/project level without adhering to a common frame of reference.

# Engagement with the GEF-CSO Network

**I**n 2016, GEF IEO undertook an Evaluation of the GEF-CSO Network (GEF IEO 2016). This chapter provides an update on the recommendations flowing from this report and a status check on the GEF's engagement with the larger array of CSOs that are part of the GEF partnership.

## 5.1 Background and context

The GEF has a long-standing history of engaging with CSOs. Since the pilot phase in 1991, CSOs have held consultations in sessions prior to the GEF semi-annual Council meetings, at which time they exchange their views about GEF activities and have a dialogue with the partnership about GEF projects and policies.

As part of the restructured GEF, the Secretariat presented to the GEF Council, at their first meeting in July 1994, the "Technical Note on NGO Relations with the GEF." This document stated that, "with the restructuring of the GEF, it is timely to consider a more systematic relationship between the GEF and NGOs" (GEF 1994, 2). It recommended that the Council or the Secretariat approve a list of "accredited NGOs" whose purposes and activities are related to the GEF.

In February 1995, at its third meeting, the Council was presented criteria for the selection of NGOs that were to be a part of its semi-annual deliberations. The NGOs would be chosen from the GEF's "Network" of accredited NGOs, the roles and responsibilities of which would be, "to communicate with the wider NGO community, including responsibility for preparing for and reporting on the Council meeting and NGO consultations, should be determined by the NGOs" (GEF 1995, 1). The Council-mandated objective for this network of accredited NGOs (CSO Network), "to prepare for and report on the GEF Council meetings and NGO consultations to the wider CSO community at the national, regional and international levels," has remained consistent throughout: It is echoed in contemporary documents of the GEF and the GEF-CSO Network (GEF 1995, 2017c; GEF-CSO Network 2016).

In 2001, CSOs began to formalize the structure and responsibilities of the Network. In 2003, the Network's coordination committee adopted the Guidelines for the Coordination Committee of the GEF NGO Network. These have evolved through successive cycles of self-regulation.

As described in the 2016 evaluation of CSO Network, the “Revised Rules and Procedures had grown markedly from the 2003 set of guidelines—i.e., from 10 to 37 pages, including annexes” (GEF IEO 2016, 43). Beyond having more specific elections procedures, the October 2015 edition of the revised rules and procedures document contained items that were not explicit in the 2003 guidelines:

- Elections task force and associated revisions to procedures for managing elections—**added 2008**
- Description of membership benefits and obligations—**added 2008, refined 2014**
- Representation—**added 2008, refined 2014**
- Provisions for subcommittees and task forces—**added 2008, refined 2014 and 2015**
- Provisions for the inclusion of indigenous focal points—**added 2008**
- Country contact points—**added 2008, refined 2015**
- Membership criteria—**added 2014**
- A complaints procedure—**added 2008, refined 2014 and 2015.**

The current structure consists of elected CSOs (regional focal points), each of which represents a region encompassing more than one country or CSO constituency. The coordination committee currently includes 16 regional focal points, one each from different geographic region. In addition, three indigenous peoples focal points representing indigenous peoples organizations are elected or appointed by the indigenous peoples groups from three main regions—Africa, the Americas, and Asia-Pacific (GEF-CSO Network 2016).

Leadership of the coordination committee is assigned to a chair and vice chair who are elected for a four-year term by their regional focal point peers. The committee acts as the final ruling body of the Network. Subcommittees are established.

Over the past decade, the CSO Network has relied on a secretariat to manage and facilitate the work of the Network, both at the time of coordination committee and GEF Council meetings as well as to undertake a set of administrative tasks in the times between.

The membership of the CSO Network comprises organizations formerly accredited by the GEF or, since March 2010, approved through the Network’s own governance structure. Currently, the number of members is estimated to be about 500.<sup>1</sup>

In June 2015, the Network set out its second strategic plan, in which it laid out its vision, mission and objectives, and strategies for achieving them. The document reflects a broadening of the Network’s mandate beyond that described in Council documents (see [box 5.1](#)).

At the time of the 2016 evaluation, the Network was most active just prior to and after Council meetings. Typically, a report was submitted to the Council itemizing Network activities and accomplishments each year, and a report was prepared following each Council meeting for distribution to the Network summarizing the Council’s proceedings and the CSO consultations. A Network newsletter was also sent to members. The Network organized meetings of regional CSOs on the day prior to the ECWs to promote the CSO Network, exchange project-based knowledge, and prepare CSO positions for presentation to the regional constituency during the workshop. These meetings were supported logistically and financially by the GEF Secretariat.

Successive evaluations of the GEF-CSO Network (2005, 2016) highlighted a paucity of financial resources (heavy reliance on in-kind contributions)

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<sup>1</sup> The CSO Network list available to the GEF IEO (dated 2020) shows 550 records.

### Box 5.1 CSO Network vision, mission, and objectives

**Vision:** "A dynamic civil society influencing policies and actions at all levels to safeguard the global environment and promote sustainable development"

**Mission:** "To safeguard the global environment through strengthening civil society partnership with [the] GEF by enhancing informed participation, contributing to policy development and stimulating local action"

#### Objectives:

- Enhance the role of civil society in safeguarding the global environment;
- Promote effective engagement of civil society in GEF operations; and
- Strengthen the capacity of the Network and CSO members to participate in GEF-related activities.

**Source:** GEF-CSO Network 2016.

that has compromised effectiveness. Patterns of support to 2016 are set out below:

- **1996–2008:** \$140,000 per year to support participation in Council meetings
- **2008–16:** this support revised to \$200,000 per year
- **2008:** Voluntary Trust Fund was established; in 2012 the GEF Secretariat opened the account and added \$100,000 to be used in grants
- **2009, 2011, 2012, 2013:** \$50,000 per year from the GEF Secretariat for outreach/communication, membership administration, and travel
- **2013:** \$65,000 disbursed to the Network for a study of GEF's Public Involvement Policy
- **2015:** \$50,000 disbursed for outreach/communication, membership administration, and travel.

To 2016, several attempts had been made by the Network to secure a medium-size project for the purpose of supporting Network capacity building, all unsuccessful.

## 5.2 Overview of 2016 IEO evaluation

The 2016 evaluation of the GEF-CSO Network (GEF IEO 2016) was requested at the GEF Council's 47th meeting in October 2014. This request was a response to a recommendation in the previous 2005 review of the NGO Network, which requested the then-office of Monitoring and Evaluation in the GEF to include an evaluation of the Network in the Overall Performance Studies of the GEF (GEF 2005). The 2005 review of the GEF NGO Network was requested by the Network itself. Elements of the Network were also reviewed in the Second, Third, and Fourth Overall Performance Studies. In addition, the Fifth Overall Performance Study included a technical study on CSO engagement with the GEF (GEF IEO 2013a).

As an input to the GEF-7 replenishment, the 2016 evaluation of the CSO Network addressed two key questions with the following conclusions:

- To what extent is the CSO Network meeting its intended goals and strategic objectives and adding value to the GEF partnership and its membership?
  - The GEF-CSO Network continues to be relevant and is delivering results to the GEF Partnership.
  - The GEF-CSO Network's partnerships are distant from the country level where GEF projects make their mark and from where the majority of Network CSOs operate. As such, the Network is compromised in its ability to inform the GEF Council with country perspectives.

- How are features of the GEF-CSO Network contributing to its ability to meet its objectives?
  - The GEF-CSO Network is operating in an expanding GEF partnership without a shared contemporary vision of the role the Network can play within the changing architecture and the resources it would need to be effective.
  - Within the context of an increasingly complex operating environment, the GEF-CSO Network has strengthened organizationally over the period under evaluation, but governance challenges remain.

The evaluation recommended that:

- a. A contemporary vision for the Network should be created, including a modality to finance Network activities.
- b. Clear rules of engagement should be developed to guide cooperation and communication.
- c. The Network should continue to build itself as a mechanism for strengthening civil society participation in the GEF.
- d. The Network should strengthen its governance.

### 5.3 Extent to which recommendations have been taken up

There is limited progress across the recommendations.

#### CSO NETWORK DEVELOPMENTS UNDER THE UPDATED VISION (RECOMMENDATIONS A AND B)

The progress that is most noteworthy concerns the formulation and implementation of the GEF's Updated Vision to Enhance Engagement with Civil Society. The Updated Vision document was developed and approved by the Council in December

2017. The Vision Statement itself is set out in [box 5.2](#).

The vision document describes how the GEF is to engage with civil society, inclusive of the CSO Network, through GEF-led events. These include GEF Council meetings and related consultations as well as the GEF Assembly. The document also sets out guidelines for CSO participation in the GEF's Country Support Program and in other activities led by the Secretariat that relate to the development of policies and strategies. As such, the Vision Statement takes its place as an accompaniment to the governance-related requirements under the updated Policy on Stakeholder Engagement.

#### Box 5.2 GEF updated vision to enhance civil society engagement with the GEF

The overarching objective of engagement between the GEF and civil society is to achieve greater results and impact through improving its collaboration with CSOs.

In this context, the primary role of civil society within the GEF Partnership is to contribute, as appropriate, to the development, implementation, monitoring, and evaluation of GEF programs and projects, through (among others) engagement in projects on the ground, building awareness of the GEF in local communities, dissemination of information about the GEF to stakeholders, engagement with recipient country governments, and participation with Council members.

In addition, civil society plays an advisory role for the GEF Council on institutional policies and guidelines and helps formulate strategies effectively. To this end, the CSO Network plays a key role in advocacy and outreach to civil society at the global level, by supporting the dissemination of information about the GEF as well as contributing to policy and strategy development.

Source: GEF 2017c.

Specific mention of the CSO Network in the implementation section of the Vision document is made in relation to: the GEF Secretariat coordinating with the Network ahead of regional annual meetings of regional workshops under the Country Support Program; inclusion of the Network as a representative in various multisectoral working groups; technical advisory groups and replenishment processes; the Network as a consulted party on the selection of CSOs to be sponsored for Council consultations and meetings; the Network's continuing input/advocacy role on GEF policy; and the Network's role as a co-organizer with the GEF Secretariat and others of the CSO Forum held during the GEF Assembly (GEF 2017c).

Of note, the Updated Vision assigns the Secretariat with lead responsibilities regarding representation and consultation functions, and it puts the GEF Council in the role of selecting the topics for the pre-Council consultations. The CSO Network's historic leadership role on these matters is now reduced to it being consulted on selection criteria and selection choices for representation and engagement on content development for civil society events at Council meetings and the General Assembly. After two years of implementation, there is divided opinion on the merits of this development.

On one side of the divide, the changes under the Updated Vision are thought to have led to more diverse CSO involvement in GEF governance and more focused conversations. Regarding pre-Council consultations, for example, anecdotal feedback is positive. The topics are seen as relevant to Council's agenda and engaging of a range of CSOs with relevant experience ([box 5.3](#)). Reportedly, Council attendance at these sessions has increased under this new arrangement though competing calls on Council members' time on this pre-Council Day continues to be a challenge.

On the other side of the divide, the changes outlined in the document are thought to have undermined the Network's historic role as the voice and coordinating body for GEF-affiliated CSOs. The CSO Network highlights the following concerns:

- A reduction in the number of CSO representatives funded to attend Council meetings from 30, a number agreed upon by Council in 2008, to 15
- Constraints now placed on the Network in convening its regional and indigenous peoples focal points along with additional CSOs for the purposes of drawing together Network positions for Council, discussing Network business, and capacity building
- Reduced opportunity for CSOs to engage the Council on immediate/emergent agenda items as a consequence of having consultation session topics anticipated up to a year in advance and in a process mediated by the GEF Secretariat, and
- A perceived reframing of the consultations by the GEF as information exchange rather than policy dialogue events.

Action on two additional commitments outlined in the Vision document and perceived by the CSO Network as positive are thought to have been compromised or else left underdeveloped. One pertains to the relaxation of the rules regarding when CSO representatives can speak at Council meetings. The CSO Network welcomes this measure but regards it as diminished in significance because of newfound constraints on convening the coordinating committee in Washington, DC ahead of Council meetings to prepare Network inputs on agenda items.

The other pertains to the GEF's stated commitment to support civil society engagement at the national and regional levels. Again, this is welcomed but it comes with the concern that the GEF is putting all its capacity building efforts into its own Country Support Program (which includes the ECWs and



### Box 5.3 Engagement of civil society and indigenous peoples organizations in consultations at GEF Council meetings, 2018–20

#### 55th GEF Council (December 2018)

- Participation: 70
- Topics/activities: Updated Vision; CSOs in GEF-7
- Half-day workshop: “Connecting Environmental Impact and Gender Equality”—Gender dimensions in commerce, health, land rights, and control of natural resources; indigenous perspectives on gender and climate justice; gender equality priorities for GEF-7; recommendations
- Release of SGP publication: [“Women as Environmental Stewards: The Experience of the Small Grants Programme.”](#)

#### 56th GEF Council (June 2019)

- Participation: 120
- Topics/activities: Dialogue with the CEO; discussion on CSO contributions to higher results and impacts
- Half-day workshop: “Plastic pollution: How do we tame this menace? Solutions from CSOs, government, and the private sector”—dialogue on the plastics life cycle, on shifting the production and consumption paradigm in favor of circular economy/closed-looped solutions, and on financing innovation

#### 57th GEF Council (December 2019)

**Source:** Council documents.

**Note:** Participants have included: Council members, CSOs, indigenous peoples/local communities, GEF Agencies, GEF STAP, GEF IEO, convention focal points, GEF Secretariat.

- Participation: not stated
- Topics/activities: Dialogue with the CEO; discussion on the development of GEF’s Private Sector Strategy and of the GEF-CSO Network and its sustainability
- Half-day workshop: “Combating the illegal wildlife trade: a civil society perspective”—dialogue on experiences of community co-management of wildlife conservation and law enforcement; benefits and challenges for communities engaged in a “wildlife economy”

#### 59th GEF Council (December 2020—postponed from the 58th Council due to COVID-19)

- Participation: 167 online participants
- Topics/activities: Dialogue with the CEO
- Half-day workshop: “The Application of Traditional Knowledge (TK) by Indigenous Peoples and Local Communities: Stewards of the Global Environment”—role and value of traditional knowledge; its application in biodiversity conservation and in supporting livelihoods; case examples of TK in different resource management settings; role of TK in responding to the COVID-19 Pandemic; recommendations
- Release of SGP publication: [Small Grants Programme: 25 Years of Engagement with Indigenous Peoples.](#)

national dialogues) and overlooking the potential in the CSO Network to play a capacity building role within the partnership.

Identifying financing as an important constraint on Network effectiveness, the 2016 evaluation recommended a deliberation over the modality to finance Network activities. In the end, this was not included

in the visioning exercise and, on this aspect, there has been no subsequent progress.

Today, the working relationship between CSO Network and the Secretariat is intact. Regular contact is maintained through online meetings and e-mail exchange between the Partnership Team and active members of the coordinating committee though, by all accounts, the relationship is strained, mostly

over role delineation. Under the Updated Vision, the CSO Network's leadership remains uncertain of its role and potential within the GEF partnership.

One area of uncertainty under the updated Vision concerns the status of the CSO Network's role as the accrediting body for CSOs. Since 2008, the system for providing accreditation has resided with the CSO Network; accreditation has been part of membership admission. As stated in the Network's rules and procedures document, "Organizations which are admitted as members of the Network will be eligible to attend GEF Consultations and Assembly meetings in a similar manner to formerly accredited organizations" (GEF-CSO Network 2016). With the Secretariat now responsible for the selection of CSOs to attend these events, the accrediting role of the CSO Network requires clarification.

Regarding the GEF's Updated Vision document as a source of direction for the GEF's engagement with civil society, the evaluation draws the following observation from a comparison with the newly minted Private Sector Strategy, approved by Council in December 2020 (GEF 2020a). The CSO and the private sector engagement documents contain a vision statement for their respective stakeholder groups. Accompanying the private sector engagement vision, however, is a strategy referenced to GEF-7 programming directions, an implementation plan, and a commitment to formulate metrics with which to measure effectiveness. As such, the private sector engagement document goes further than the CSO engagement document in spelling out the GEF's intentions. The Updated Vision to Enhance Civil Society Engagement is, by contrast, activity and procedure focused.

## **CSO NETWORK DEVELOPMENTS SINCE THE 2016 EVALUATION (RECOMMENDATIONS B AND C)**

The CSO Network's efforts to build itself up as a mechanism for strengthening civil society participation in the GEF have been hampered by financial constraints, reduced opportunities to meet and plan together and by internal tensions on the Network coordinating committee. In the immediate aftermath of the 2016 evaluation, the Network approved a membership strategy; committed to extend the use of country contact points to assist regional focal points to build and maintain connections at ground level; proposed to develop a skills/experience inventory within the membership; and promoted itself as a facilitator of CSO government dialogue. In its 2019 report to the Council, the CSO Network described its progress on these items as mostly held to consultation sessions with the GEF Secretariat and participation at Council meetings.

There has been no member newsletter and no functional website since 2017. A new website is under development at the time of writing, however. According to the Network leader whose organization has initiated the new digital platform, its launch is contingent upon: a hosting agreement with an independent organization (most likely a future secretariat body to the Network); compatibility checks with the GEF Secretariat to ensure that content can flow back and forth between the CSO Network and GEF websites; and funding to support the advanced phases of website development and future operations. Discussions are under way on all three counts.

Initial efforts to strengthen governance mechanisms have also stalled. Work was done around the time of, or immediately after, the evaluation to address the Network's complaints process, realign constituencies, and separate the secretariat function from Network leadership roles.

The latest (2016) version of the Network rules and procedures document places the now independent Network secretariat in a central stewarding role in the processing of complaints. By design, the new and as yet untested procedure encourages the handling of grievances within the Network and avoidance of GEF's own grievance mechanism. The new procedure maintains scope for outside arbitration, though does not make explicit the triggers that would set that course of action in motion.

As suggested in the 2016 evaluation, the Network's strategic plan was updated to align with GEF-7 programming directions and focal area working groups were created. However, as much of the work envisaged in the plan is resource dependent there is little to report against planned outputs.

While there is continuing interest in membership where it is being stimulated by active CSO Network leaders, there are also signals some current members are not renewing and new members are not joining. The coordinating committee is at half-strength or less with internal tensions and vacant positions; its working groups are mostly inactive and the Network secretariat role is unfilled. At the time of writing, lead members of the coordinating committee are gearing up for elections to fill vacant regional focal point roles and to find nominee organizations to fill the secretariat role.

The last funding grant, \$50,000 from the NGO Volunteer Trust Fund, was received in October 2015. Attempts since then to demonstrate the Network's value proposition inside or outside the partnership have yet to yield financial support. Funding mechanisms tried include the following:

- **CSO Network Voluntary Trust Fund:** no further contributions made to the Fund
- **Medium-size project:** another attempt to prepare a medium-size project to support Network capacity development noted in findings a GEF

Agency willing to commit, but feedback that the medium-size project is an inappropriate funding vehicle on account of eligibility criteria being closely tied to convention focal areas

- **SGP-CSO Network cooperation:** discussions concerning cooperation in the development of national dialogues.

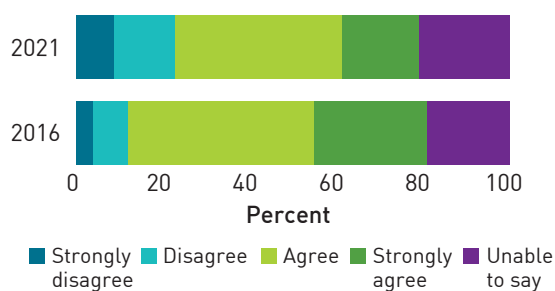
Regarding the last point, SGP and CSO Network key informants agree that there are unexplored synergies between the two initiatives warranting further attention. In short, the SGP has expansive country-level organization across the globe and connection to a wellspring of CSOs with project experience across the focal areas. This has long been a challenge for the CSO Network. At the same time, the CSO Network has the organizational potential to connect CSOs laterally within regions and to channel the CSO voice into the GEF's governance mechanisms. This does not exist within the SGP.

### Member perceptions of CSO Network effectiveness

In 2021, member perceptions of the CSO Network's efficacy are mixed. A slight majority of CSO Network members continue to see in the CSO Network a structure that enables effective and efficient sharing of information, with all major stakeholder groups fairly represented in Network governance, and election processes that are fair and transparent. At the same time, on each of these variables, at least a quarter of respondents take an opposite view. As well, perceptions of these aspects are less favorable today than was the case in 2016.

On elections matters, for example, [figure 5.1](#) shows a doubling in the percentage of respondents who do not feel these processes are fair and transparent and a diminishment among those who do (from 69 percent to 57 percent).

**Figure 5.1** Member agreement on fairness and transparency in the CSO Network’s election processes (%)



Source: GEF IEO 2016 and 2021 e-surveys.

Note: 2021 n = 200; 2016 n = 104.

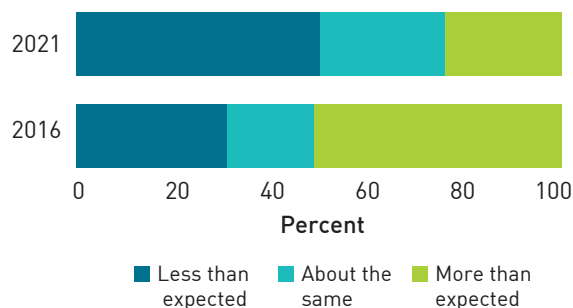
The survey carried out for this evaluation also shows a consistent decline in assessed member benefit on six aspects of membership since 2016:

- Improved level of awareness and understanding of the GEF;
- Access to GEF Council meetings and its decisions;
- Improved interactions/relationships with other Network members;
- Access to more capacity-building opportunities;
- Improved interaction/relationship with country decision makers; and
- Value addition to own research/organization activities.

Across the above-mentioned variables, expectations are exceeded for between 20 and 40 percent of respondents in 2021. In 2016 the range in the percentage of respondents in this category was similarly spaced but 20 percentage points further to the positive (i.e., ~40 percent to ~60 percent). Figures 5.2 and 5.3 track perceptions for the two functions most closely related to the Council-related mandate for the CSO Network.

In 2021, half of the member respondents said that their expectations regarding ability to access GEF Council decision making were “less than expected.”

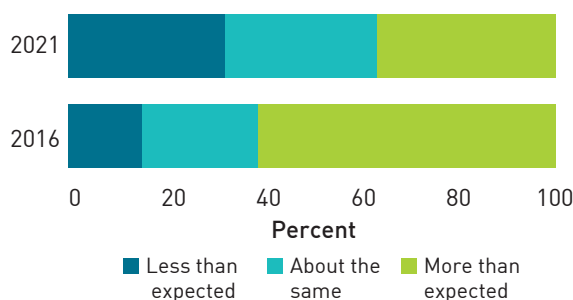
**Figure 5.2** Member agreement on access to GEF Council meetings and decisions



Source: GEF IEO 2016 and 2021 e-surveys.

Note: 2021 n = 221; 2016 n = 104.

**Figure 5.3** Member agreement on in level of awareness and understanding of the GEF



Source: GEF IEO 2016 and 2021 e-surveys.

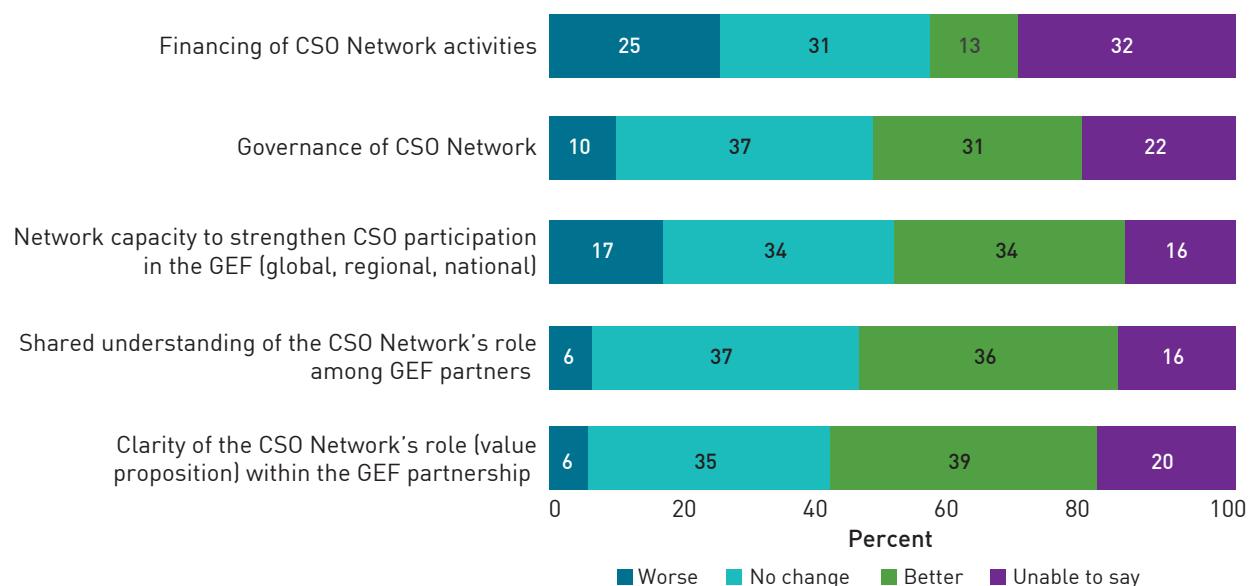
Note: 2021 n = 221; 2016 n = 104.

This contrasts with the 30 percent of members who said the same in 2016.

Similarly, in 2021, nearly a third of the member respondents said that their expectations on the acquisition of awareness and understanding of the GEF were “less than expected.” This contrasts with the 15 percent who said the same in 2016.

Finally, asked to perceive a trend in Network health over the past five years, respondents were again varied in their answers. Figure 5.4 shows that across five aspects of Network health, as many or more respondents see “no change” or a “worsening” over the past five years and, at best, slightly more than a third see the situation getting “better” “in the same time period. Reflecting the paucity of

**Figure 5.4 Member assessment of the trend in the health of the CSO Network (n=221)**



**Source:** GEF IEO 2016 and 2021 e-surveys.

**Note:** n = 221.

financing over the past five years, very few respondents assess a positive trend on this aspect.

### Agency and OFP perceptions of CSO Network effectiveness

Agency and OFP knowledge of the CSO Network is low to medium, depending in part on the volunteer leadership provided by the regional focal point and by the overall climate for CSO participation at the country level.

In the survey of OFPs carried out for this evaluation, two-thirds of respondents described their level of familiarity with the CSO Network as “somewhat familiar.” The remainder were evenly split between being “not at all” and “very” familiar.

By and large, GEF Agencies have developed their own CSO relationships independent of the CSO Network. For the most part, knowledge of the CSO Network is gained through their presence at GEF events, mostly notably Council meetings and ECWs. In conversation, most Agency key informants were unaware of any outreach efforts toward GEF

Agencies by the Network, either at a global or a country level. Their observations about the role of CSOs and the CSO Network in the GEF are summed up as follows:

- Engagement with CSOs, including the Network, is an important way to actualize GEF policies (i.e., the policies on stakeholder engagement, gender, and environmental and social safeguards).
- Successful engagement hinges on intentionality in design and investment in capacity.
- Some CSO configurations tend toward being advocacy focused, while others are more developmental/collaborative.
- While intrinsically valuable, the CSO Network role in the GEF is poorly understood and integrated; in many places it is disconnected from its membership base.

## Member suggestions to reinforce or strengthen the CSO Network

Member suggestions to reinforce or strengthen the CSO Network hinge on a handful of key ideas: focus more on the base and country-level organization and communication; build capacities related to focal areas, project management, and advocacy; revamp Network governance to be more member responsive, accountable, and agile; and mobilize financing. A summary of CSO Network member responses is set out in [table 5.1](#).

### Representativeness of the CSO Network

It appears that the CSO Network is broadly representative of the larger array of CSOs associating with the GEF. The CSO surveys of 2021 and 2016 show similarities across key variables including regional representation, organizational type, scale of operation, and main areas of work. And, as noted in the discussion of the Stakeholder Engagement Policy, there is also a considerable degree of

consistency in the patterns of interaction with the GEF Partnership. Figures [5.5](#) and [5.6](#) profile the members and nonmember respondents of the CSO Network by their geographic scale of operation and by their main areas of work.

[Figure 5.5](#) shows that the largest proportion of CSO survey respondents (2016, 2021) identify as “national” in their scale of operation, and the smallest proportion identify as “global/international.”<sup>2</sup> The pattern of identification is consistent across both surveys and across member and nonmember respondents. The pattern is also partially reflected in the CSO Network membership list, where the largest proportion of members (49 percent) identify themselves as “national” and the second largest as “local” (22 percent).

<sup>2</sup>In the survey, respondents were asked to select “all that apply.”

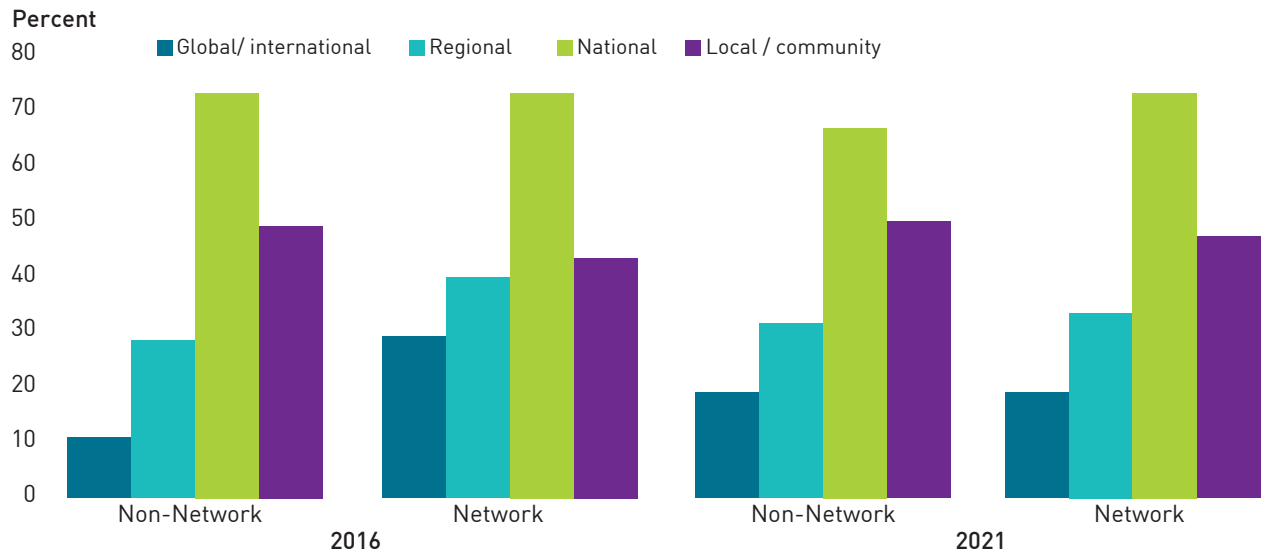
**Table 5.1** CSO Network member suggestions to reinforce or strengthen the Network

Member communications (24% of comments)	Network services (19% of comments)	Network governance (14% of comments)	Network finance (7% of comments)
<ul style="list-style-type: none"> <li>• National-level member interaction—more frequent, more proactive, online sessions</li> <li>• More updates on the GEF (e-newsletter, interactive online platform)</li> <li>• More attention to language barriers among those who do not speak English</li> </ul>	<ul style="list-style-type: none"> <li>• Capacity development activities (online and in person)—focal area topics, grant writing, M&amp;E/RBM, skills for regional global participation and for scale up/out</li> <li>• Continuous sharing of ideas/lessons (including from the SGP)</li> <li>• More info on the GEF</li> <li>• Access to project financing</li> <li>• Partnership brokering</li> <li>• Youth leadership/empowerment</li> </ul>	<ul style="list-style-type: none"> <li>• More emphasis on focal points/national structures</li> <li>• Rejuvenate leadership</li> <li>• Better reporting and accountability— independent, member-driven monitoring</li> <li>• Modernize—more “networking,” less “bureaucratic structure”</li> <li>• Greater representation of indigenous people (with translation)</li> <li>• Inclusion/induction of new members—peer support</li> </ul>	<ul style="list-style-type: none"> <li>• Funding for website, outreach, capacity development</li> <li>• Activate the NGO Voluntary Trust Fund</li> <li>• Resource mobilization strategy</li> <li>• Clarify role under the Updated Vision</li> <li>• More funding opportunities for member CSOs</li> </ul>

**Sources:** GEF IEO survey of GEF CSOs (2021); key informant interviews (Philippines, India); case studies (Costa Rica, Mozambique).

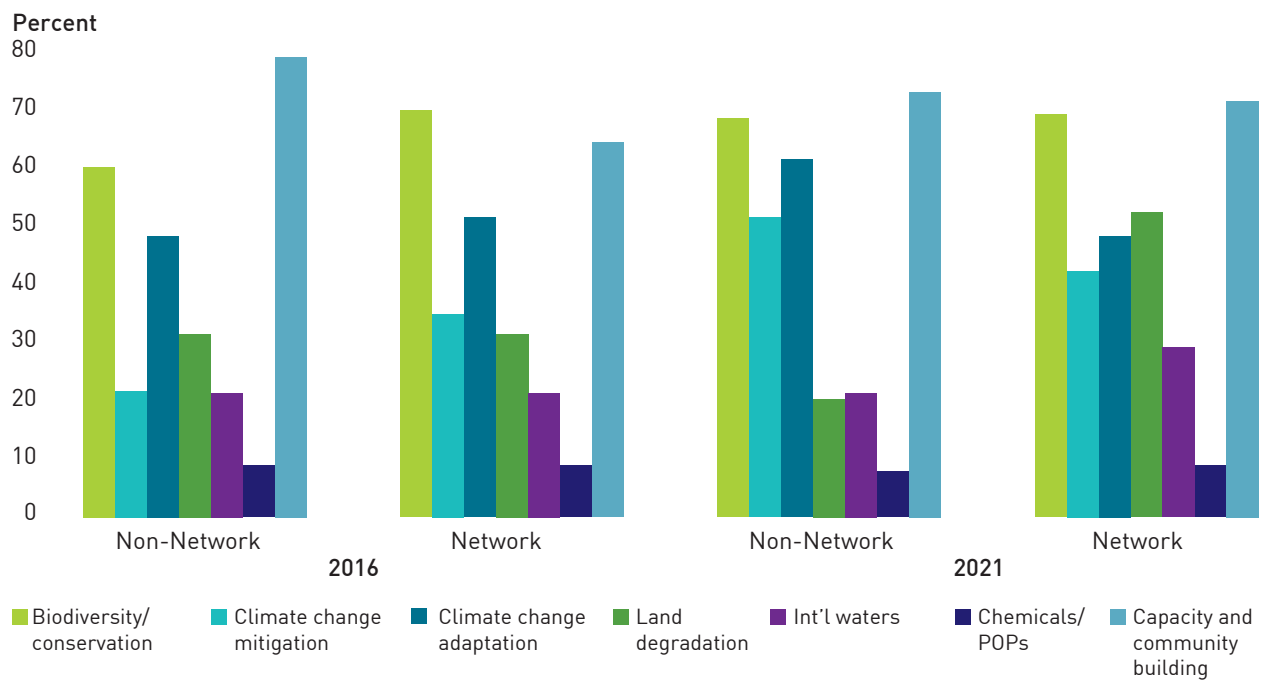
**Note:** *n* = 231. Slightly more than three-quarters of respondents (181 of 231) had comments.

**Figure 5.5 CSO scales of operation: Network and non-Network**



Source: GEF IEO 2016 and 2021 e-surveys.

**Figure 5.6 Main areas of work of CSOs: Network and non-Network**



Source: GEF IEO 2016, 2021 e-surveys.

Figure 5.6 shows that the largest proportion of CSO survey respondents (2016, 2021) identify capacity and community building as a main area of work. This is not surprising given the cross-cutting nature of this work. Respondents identify their technical areas of work in much the same way across the surveys and regardless of CSO Network membership status. Here too, there is some consistency with the profile of the CSO Network membership. Regarding the more technical areas of work, the most frequently identified categories are biodiversity/conservation (44 percent) and climate change (nondifferentiated) (48 percent).

### GEF initiatives to engage the larger field of CSOs

Under the Updated Vision, the Secretariat's Partnership Team is engaging the larger field of CSOs that are mostly connected to the SGP. The team maintains a CSO landing page on the GEF website that clarifies opportunities for CSO involvement, and is developing learning events, including the pre-Council consultations (box 5.3). Under GEF-7, ECWs introduced a full day dedicated to CSO issues with all stakeholder groups present (i.e., OFPs, government officials, and CSOs).

The COVID-19 pandemic is causing the GEF to accelerate the development of online strategies to engage CSOs and other partners at the country and regional levels through the Country Support Program. The current initiative to convert the Art of Knowledge Exchange learning package for CSOs into an online offering is one example.<sup>3</sup>

Historically, Internet connectivity has posed as a communications challenge to networking within

<sup>3</sup> This is a guidebook and toolkit for enhancing knowledge exchange and learning at the national, regional, and global levels. It combines "how-to" advice with case studies and examples of successful knowledge exchange experiences in GEF programs and projects. See GEF Secretariat (2017).

#### Box 5.4 Global data Internet usage: trends relevant to the GEF's engagement strategy

Global data Internet usage shows rapidly increasing Internet "penetration," currently expanding from about 60 percent of the global population. In early 2021, there were 4.7 billion users. In 2005 there were 1.1 billion and in 2015, at the time of the CSO Network evaluation, there were just over 3 billion. Currently we are adding over 300 million users per year (~7 percent of the global population). Two-thirds of the world's population use a mobile phone and more than half of the devices on the web today are mobile phones.

Source: DataReportal.

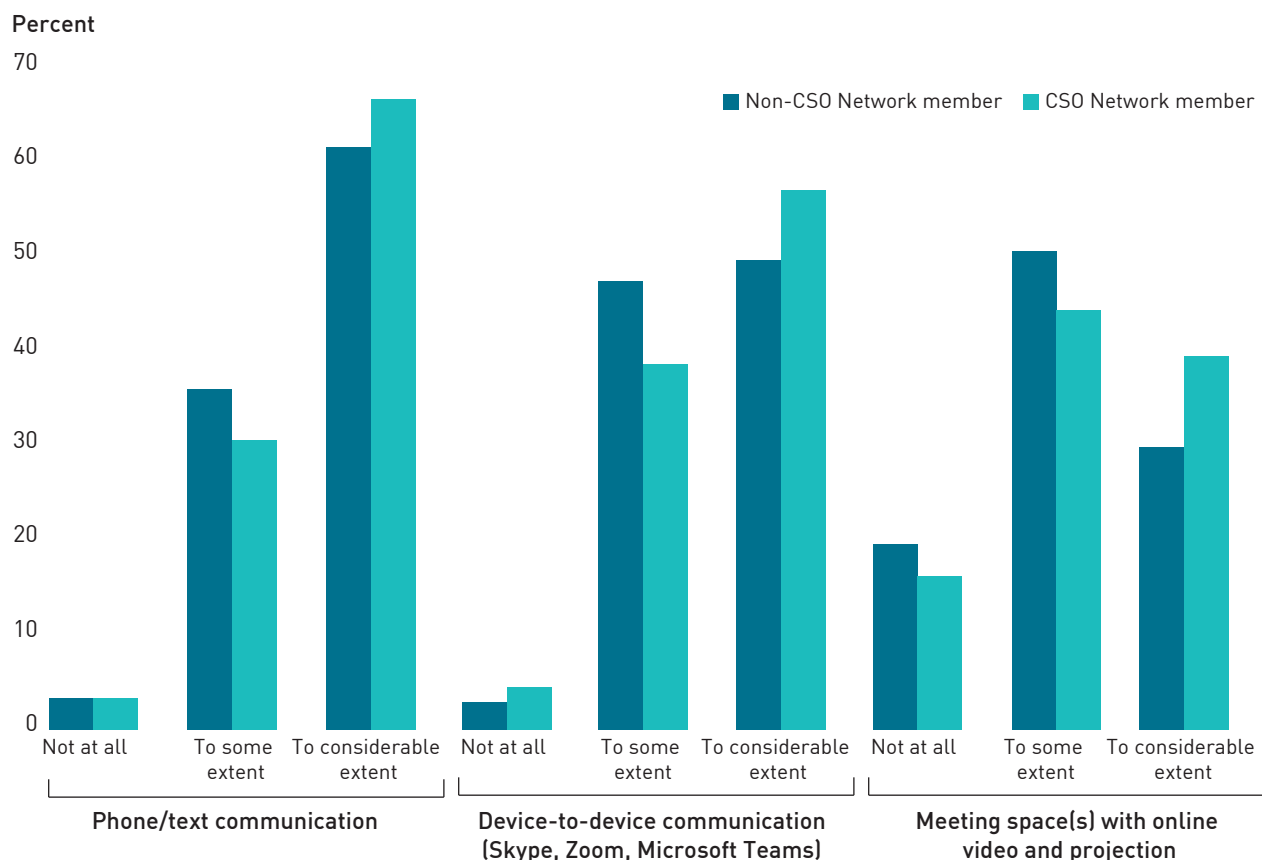
civil society. Quality meeting and training interactions have only been possible in person and at significant cost. That is changing globally, albeit unevenly across countries and within them between urban and rural areas (see box 5.4).

As a matter of priority, an intensification of communication/interaction with and among CSOs is called for by CSO Network and non-Network members alike. And while most are not explicit on the means by which this happens, the number of CSO survey respondents favorable toward online engagement is greater than the number warding against it. The following from a survey respondent typifies the sentiment, "We need more opportunities to get together, even virtually to share our experiences/challenges and be familiar with the GEF global vision." Current capacities among GEF-affiliated CSOs to engage with information and communications technologies (ICTs) is set out in figure 5.7.

Figure 5.7 shows that in 2021, almost all CSO respondents said they use phone/text communication to a "considerable" (65 percent) or to "some" (32 percent) extent. A lesser though still significant proportion of respondents said they had the



**Figure 5.7** CSO access to information and communication technologies in the GEF partnership



**Source:** GEF IEO survey.

**Note:**  $n = 411$ .

device-to-device communication that would support platforms like Skype, Zoom, or Microsoft Teams (42 percent to “some” extent and 54 percent to a “considerable” extent). And when probed on capacity to convene with online video and projection, a third of the respondents (36 percent) said they could to a “considerable” extent, while a just less than half (47 percent) said that they could to “some” extent. About 18 percent of respondents reported not having that advanced capacity at all. Overall, the data indicate scope to advance the application of ICTs to connect CSOs with each other and with others in the GEF partnership.

## 5.4 Insights on CSO engagement: a comparator scan

A scan of the literature suggests that, since the 1970s, progressively more inclusive approaches have been taken in the governance of funding mechanisms like the GEF and that in the intervening time a body of knowledge has developed that, today, provides relevant insight for the GEF Partnership as it moves into its eighth replenishment. This section draws on this body of knowledge and, in particular, on the experiences of a select group of comparator organizations.

Among climate funds, the GEF is the oldest and its engagement with CSOs is the longest running. The

relationship between the GEF and the GEF-CSO Network has matured over 30 years. As such, it has been observed by peer institutions as a leader of civil society engagement both within the field of climate finance and more broadly.

The literature observes the clarification of a continuum of engagement that spans from one-way, “informing” type communication toward progressively more civil society-involving, two-way activities that ultimately manifest in “partnerships.”<sup>4</sup> It points to a differentiation and widening in the involvement of civil society at different scales from local to global and to the growing complexity in the task of reconciling CSO perspectives and capacities across those scales. The literature describes for example: public disclosure and the progressive inclusion of integrity provisions, considerations regarding the use and limits of funding to support engagement and CSO capacity, the proliferation of learning and sharing platforms, broadening scope both for advocacy and participation in program/project implementation, lateral connectivity across multistakeholder partnerships, and the growing body of evidence that links civil society engagement with developmental and environmental impacts (AED 2005; Ford Foundation 2018; Global Partnership for Effective Development Cooperation 2020; OECD DAC 2020; PTF 2019; Transparency International 2017; Watershed: Empowering Citizens 2020). A summary of practice

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<sup>4</sup>Within the last 10 years, the World Bank has devised the term “engagement continuum” to describe the different forms of interactivity between the Bank and CSOs. In schematic form, the continuum identifies five levels of engagement: outreach and information disclosure, dialogue, consultations, cooperation, collaborations, and partnerships. Each level is a progression on the last regarding the degree of involvement, the level of decision making (from “none” to “equal”), and the magnitude of influence that can be obtained. The continuum, adapted from International Association of Public Participation (IAP2) Spectrum of Public Participation, is discussed in World Bank (n.d.).

insights gleaned from the literature is set out in [box 5.5](#).

Regarding the financing of CSO network organizations, specifically, the literature reviewed makes the following observations:

- Securing a sustainable source of financing is a time-consuming, energy-intensive challenge across networks.
- Member organizations at the national and local levels are hard pressed to pay, and southern members are often less able to contribute than northern members.
- There is a reliance on in-kind contributions and power differentials can occur as a consequence of differing abilities to contribute.
- External sources of funding (private and public) often come with conditions which can be problematic where there is misalignment around mission and values.
- Networks can inadvertently find themselves competing for funds with their members, which can be a source of tension.
- Support is often trained on specific aspects of a network’s operation, e.g., observer meetings, training delivery. Core funding is sought, but has been hard to secure.
- Arguments for long-term, flexible grant support (i.e., core funding) to civil society are gaining ground; proponents include large philanthropic organizations like the Ford Foundation, the Development Assistance Committee of the Organisation for Economic Co-operation and Development, the Global Partnership for Effective Development Cooperation, and the Civil Society Platform for Peacebuilding and Statebuilding. Reference is made to the 2030 Agenda (and in particular Sustainable Development Goal 16).
- The essential idea under this flexible, longer-term, core support model is to invest in

### Box 5.5 Relevant insights about CSO engagement from the literature

Meta-level examinations of CSO engagement relevant to the GEF yield the following insights.

#### Added value brought by CSOs includes:

- Proximity and ability to reach the hard to reach appropriately
- Local knowledge
- Adaptability
- Ability to build collective action and facilitate constructive engagement with authorities.

#### Challenges in working with CSOs include:

- Multiple autonomous organizations operating at multiple scales (local, national, regional, global) and with varying degrees of organizational maturity
- Propensity for duplication of effort/lack of coordination
- High dependence on preexisting social capital—relationships (people and organizations) of mutual understanding, trust, and norms of cooperation
- Very much conditioned by the enabling environments of the countries where they operate (social, legal, political)—context matters.

#### Successful engagement with civil society, at multiple levels, requires:

- Understanding of how civil society is defined/understood
- Shared vision, policies, strategies, objectives
- Engagement mechanisms trained on objectives and responsive to the diversity of CSOs involved and to operating conditions
- Capacity development (project cycle, policy engagement, technical)
- Effective accountability, transparency, and integrity practices
- Demonstrable impact
- Resource support.

#### To be effective in forging social accountability requires that:

- CSOs be supported to leverage opportunities opened by existing stakeholder engagement policies
- CSOs engage constructively with government institutions
- Government institutions respond in kind.

#### CSO network legitimacy hinges on, among other things:

- Shared vision and organizational identity (internally and with key stakeholders)
- Clarity on the value it generates creating and delivering on strategy
- Maintaining a network design/structure calibrated to mandate and role
- Tracking and being able to demonstrate that value;
- The network being identified with its members and not the central body/secretariat (and in competition with its own)
- A balancing of routine and innovation
- Engaging information technology (IT) solutions to widen participation across stakeholders (including across language groups)
- Managing power differentials across network member organizations related to factors such as size/scale, age, capacity, location
- Managing personalities taking representational roles to ensure they reflect the will of their organization
- Continued attention to forging buy CSO/active participation
- Having sufficient statutory documentation to guide network business, conduct and accountability
- Having place adequate arrangements to handle complaints
- Provisions for member capacity building focused on skills needed for members to be effective and accountable.

#### CSO network financial sustainability hinges on, among other things:

- Being strategy led rather than donor led
- Policy guidance
- Being persuasive on value proposition
- Drawing just enough on member supports (membership fees and/or in kind)
- Entering into strategic funding partnerships (founded on legitimacy and trust)
- Diversifying sources of support to include a mix of private, public, and member sourced; project funding and multiyear core funding; use of trust funds and reserve funds; and secondments.

**Sources:** AED 2005; Global Partnership for Effective Development Cooperation 2020; OECD DAC 2020; PTF 2019; Transparency International 2017; Watershed: Empowering Citizens 2020.

civil society networks in pursuit of a commonly sought, transformational change that requires collaboration of multiple stakeholders.

- Success of the model hinges on there being a high degree of mission/vision alignment, trust, and assurance related to systems of accountability. Inclusion policies are valued for the guidance they can bring to the work.

The evaluation scanned the CSO engagement practices of a selection of 12 international governmental organizations or international financial institutions including three analogous climate financing bodies—the Adaptation Fund, the GCF, and the Climate Investment Funds (CIF). The list includes five entities that are themselves GEF Agencies.

All examined institutions are guided by policy containing stakeholder engagement requirements. For those GEF-accredited Agencies in the selection, these are the policies required by the GEF to uphold the minimum standards under the three policies covered by this evaluation.

Most institutions have, in addition to policy, strategies or frameworks setting out the way they intend to engage civil society. They have dedicated staff for this purpose. In the larger institutions, staff are organized as units and may be dispersed geographically. In several instances these civil society frameworks/strategies come with results frameworks and measurement strategies—e.g., World Bank, African Development Bank, European Bank for Reconstruction and Development (EBRD), and IDB.

Much like the GEF, these institutions typically engage CSOs for the following purposes:

- Information dissemination related to mandate, priorities, and opportunities;
- Engagement on policies and strategies (global, regional, national)—e.g., the World Bank,

African Development Bank, EBRD, IDB, Adaptation Fund, and the United Nations Convention to Combat Desertification.

Most, if not all, have public disclosure commitments designed to ensure that sufficient time and exposure opportunities are in place for CSOs to make comments.

These institutions typically include policy forums for CSOs as part of their major meetings schedules. Engagement is typically structured through an “observer” program usually involving an accreditation step and a selection process—e.g., EBRD, Adaptation Fund (accreditation by the United Nations Framework Convention on Climate Change), the GCF, CIF, World Bank, United Nations Convention to Combat Desertification, United Nations Environment Programme (UNEP). In some settings, observers have voting rights, in others they do not; in some instances, alternates are also named to ward against discontinuities and/or to broaden the scope for CSO participation. Some entities cover the costs for observer participation in meetings—e.g., Asian Development Bank (ADB), IDB, CIF, GCF (for Active Observers)—while others do not (as yet) (e.g., Adaptation Fund). Some provide secretariat support regarding preparation support ahead of meetings and in communicating with their constituencies.

Those funding institutions active at the program/project level involve tend to involve CSOs in the following:

- Project design and implementation (including stakeholder engagement, safeguards activities, gender promotion/analysis) (e.g., African Development Bank, EBRD, ADB)
- Capacity building (technical and management/communications-related) (e.g., African Development Bank, EBRD, World Bank, IDB), including granting for such

- Facilitating dialogue between civil society, government, and the private sector (e.g., IDB).

Several funders are associated with NGO networks (e.g., ADB, IDB, Adaptation Fund, United Nations Convention to Combat Desertification, UNEP, CIF); these networks tend to be independent (or quasi-independent) of the funders that are the focus of their mandates. Some of these networks tend toward a critical stance with regard to the funder, while others tend toward a more pragmatic engagement stance. On network business, use of social media helps ensure observers are connected with and accountable to those they represent.

Most networks have some form of governance body, and in some cases have their own secretariats—e.g., NGO Forum on the ADB, the Convention on Biological Diversity (CBD) Alliance, International Pollutants Elimination Network (IPEN), Adaptation Fund Network, Climate Investment Fund’s Stakeholder Advisory Network (SAN), Climate Action Network (CAN), and United Nations Convention to Combat Desertification CSO Panel. In some instances, the secretariats of the funding bodies assume a coordination/support role; in other instances, there is flexibility to shape the terms of reference for these networking bodies (e.g., IDB, UNEP). In some cases, there is a measure of distance and caution between the funding body and the network.

The largest civil society network is the Climate Action Network (United Nations Framework Convention on Climate Change) with 1,500 member organizations across 130 countries, organized into 20 regional and national nodes. By contrast, the GEF-CSO Network has a membership of about 500 CSOs.

Intended benefits of CSO engagement listed by funding bodies in their literature typically include the following:

- Development impact—sustained;
- Public outreach and partnerships—extended;
- Results and effectiveness—enhanced;
- Policy dialogue—enriched;
- Political viability—assessed;
- Ownership—enhanced;
- Accountability—exercised.

## 5.5 Summary

- An updated vision document was developed and approved (2017). It took into its scope all GEF-involved CSOs (not just Network members), and assigned the Secretariat with lead responsibilities regarding representation and consultation functions. Today, there is sharply divided opinion on the merits of these changes.
- On one side, the changes under the Updated Vision are thought to have led to more diverse CSO involvement in GEF governance (a better blending of Council-experienced CSOs and CSOs experienced with new focal areas), and more focused conversations. On the other side, these changes are thought to have undermined the Network’s role as the voice and coordinating body for GEF-affiliated CSOs.
- In the end, the recommended deliberation over “modality to finance Network activities” was not included in the visioning exercise and, on this aspect, no progress has been subsequently made. Today, the working relationship between the CSO Network and the Secretariat is intact but strained, mostly over role delineation.
- The CSO Network’s efforts to build itself up as a mechanism for strengthening civil society participation in the GEF—including a skills building strategy, a country contact concept to help connect regional focal points with the country CSOs and other GEF partners, and member recruitment—are hampered by internal tensions and financial constraints. Attempts to demonstrate

the Network's value proposition inside or outside the partnership have yet to yield financial support. There has been no functional website since 2017 and no member newsletter.

- The Network's efforts to strengthen governance mechanisms have also been hampered. Early work was done to address the Network's complaints process, realign constituencies, and separate the secretariat function from Network leadership roles. The Network's strategic plan was updated and focal area working groups were created. Today, there are signals that current members are not renewing and new members are not joining. The coordinating committee is at half-strength or less, with internal tensions and vacant positions; its working groups are mostly inactive.
- Under the Updated Vision, the Secretariat's Partnership Team is engaging the larger field of CSOs that are mostly connected to the SGP. The team maintains a CSO landing page on the GEF website that clarifies opportunities for CSO involvement. It is also developing learning events.
- The COVID-19 pandemic is causing the GEF to accelerate the development of online strategies to engage CSOs and other partners at the country and regional levels through the Country Support Program.
- According to the 2021 CSO survey carried out for this evaluation, the majority of CSO Network members continue to see in the CSO Network a structure that enables effective and efficient sharing of information, where all major stakeholder groups are fairly represented, and election processes are fair and transparent. At the same time perceptions of these aspects are less favorable today than was the case in 2016. The survey carried out for this evaluation also shows a marked decline in assessed benefits of membership since 2016.
- CSO surveys in 2021 and 2016 show similar results across key variables, including composition, size, and patterns of engagement with the GEF. It appears that the Network's membership is representative of the larger array of CSOs involved with the GEF.
- Comparator analysis suggests that, since the 1970s, progressively more inclusive approaches have been taken in the governance of funding mechanisms and that in the intervening time, a body of knowledge has developed that today carries relevant insight for the GEF partnership.

# Engagement with indigenous peoples

**I**n 2018, the GEF IEO undertook an Evaluation of the GEF Engagement with Indigenous Peoples (GEF IEO 2018b). This chapter provides an update on the recommendations flowing from this report, which touch on GEF policy aspects, programming developments under GEF-7, and the work of the Indigenous Peoples Advisory Group (IPAG).

## 6.1 Background and context

Growing international recognition of the role of indigenous peoples in promoting biodiversity, safeguarding protected areas, and advancing the sustainable management of vulnerable ecosystems is mirrored in the progression of GEF Council and GEF Secretariat publications on the subject, and reflected in enhancements regarding their participation within GEF.

It should be noted that this evaluation uses the term “indigenous peoples” broadly per usage embodied in various international conventions (ILO Convention 169) and UN working groups on indigenous populations. Per these definitions, a range of criteria may be applied to defining indigenous peoples, with self-identification as a “fundamental criterion” (ILO 169). These criteria are designed to avoid potentially discriminatory national

classifications. Some institutions also use the term “indigenous peoples and local communities (IPLC).” While some “local communities” may share identifying criteria with indigenous peoples, others do not. The GEF IPAG may wish to assist in clarifying use of the term “indigenous peoples.”

GEF-financed projects involving indigenous peoples have been implemented since the GEF pilot phase. Of the approximately 4,319 GEF-financed projects approved from the pilot phase up to September 2016 (during the GEF-6 period), approximately 426 (9.9 percent) involved indigenous peoples from a limited to a significant level, the largest concentration of projects involving indigenous peoples being in the two most recent replenishment periods (GEF IEO 2016). Additionally, approximately 15 percent of the 20,300 SGP grants awarded from 1992 up to 2016 benefited indigenous organizations or communities. This is estimated to be more than 3,000 projects in total.

Specific publications and collation of project data on indigenous peoples were not produced until GEF-4, hence much of the information on GEF engagement with indigenous peoples from the pilot phase to GEF-3 is limited to that gathered in a retrospective analysis of project documents

and evaluations, rather than from comprehensive reporting on these issues at the time. Monitoring systems identifying GEF-financed projects involving indigenous peoples were put into place in GEF-6.

In 1996, the GEF Council approved and published “Policy on Public Involvement in GEF Projects” (GEF 1996), a policy for public involvement in the design, implementation, and evaluation of GEF-financed projects, which also sets out activities and resources needed to ensure this involvement.

The first specific publication on indigenous peoples was “Indigenous Communities and Biodiversity,” produced in 2008 by the GEF Secretariat (GEF 2008). It provides an overview of GEF engagement with indigenous peoples with regard to GEF policies and operations, project financing, and work with the CBD Conference of the Parties. During GEF-5 (2010–14), the visibility of GEF engagement with indigenous peoples increased significantly, with eight specific publications, a formalized strategy, and the establishment of the Indigenous Peoples Task Force (IPTF) (2011), a precursor to the IPAG, which was created in 2013.

The 2012 issues paper on indigenous peoples prepared by the IPTF set out GEF policy options for indigenous peoples in five areas: individual and collective rights to land, territories, and resources; FPIC; full and effective participation; traditional knowledge, innovations and practices; and access and benefit sharing. It recommended the creation of the advisory committee that was to become the IPAG, and placement of in-house expertise to be a point of contact for indigenous issues in the GEF Secretariat. The paper also recommended a “direct access financing avenue” for indigenous peoples organizations, and establishment of a recourse mechanism with indigenous representation at the local, national and international levels (IPTF 2011).

The GEF Policy on Agency Minimum Standards on Environmental and Social Safeguards

was approved by the Council in November 2011. Included is Minimum Standard 4: Indigenous Peoples, providing detailed minimum requirements including social and environmental impact assessments, and indigenous peoples plans and consultation, alongside references to land, culture, traditional knowledge and livelihoods. The policy also set out the provisions of a grievance mechanism (GEF 2011a).

The 2012 Principles and Guidelines for Engagement with Indigenous Peoples was published by the GEF Secretariat for dissemination to stakeholders in three languages. The document brought together current GEF policies on indigenous peoples (principally the GEF Policy on Public Involvement in GEF Projects and GEF Policy on Agency Minimum Standards on Environmental and Social Safeguards) with explanations and intentions regarding further engagement, in response to concerns expressed by indigenous peoples (GEF 2012b).

Toward the end of the GEF-5 replenishment period in mid-2014, the GEF Secretariat published “Partnership in Practice: Engagement with Indigenous Peoples,” with input from IPAG (GEF 2014c).

Up to the time of the evaluation in 2017, the IPAG had met twice per year to provide advice to the GEF Secretariat and to coordinate the dissemination of information from the GEF and GEF Agencies to indigenous communities. Its terms of reference described the key function of the group as to “provide advice to the Indigenous Peoples focal point on the operationalization and reviewing of the Principles and Guidelines paper particularly on the appropriate modality to enhance dialogue among Indigenous Peoples, GEF Partner Agencies, the GEF Partner Agencies, the GEF Secretariat representatives and other experts.”<sup>1</sup>

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<sup>1</sup> See GEF IPAG Terms of Reference (p. 1) available on the GEF [IPAG](#) website.



IPAG members were to provide input to meetings and in the development of publications, and attend annual international meetings to discuss issues related to GEF engagement with indigenous peoples. Examples of these venues are the UN Permanent Forum on Indigenous Issues, the CBD Conference of the Parties, the United Nations Framework Convention on Climate Change Conference of the Parties, the World Conference on Indigenous Peoples, and the International Union for the Conservation of Nature (IUCN) World Conservation Congress.

At the time of the evaluation, the IPAG consisted of seven members. This included four indigenous representatives, one selected by the GEF-CSO Network to ensure coordination, and the remaining three nominated through meetings and selected by the GEF for geographic balance and experience, with nominations reviewed and endorsed by indigenous leaders and indigenous peoples networks. Also included was an expert on indigenous peoples, and two GEF Agency representatives.

## 6.2 Overview of 2017 IEO evaluation

The GEF IEO undertook an evaluation of GEF engagement with indigenous peoples in 2017 as part of the Sixth Comprehensive Evaluation (OPS6) of the GEF to inform the replenishment process for GEF-7. The report provided an analysis of the GEF's engagement with indigenous peoples, and the drivers for indigenous peoples participation in addressing environmental issues. It examined good practices and lessons learned from the GEF's engagement to date, and recommended actions that the GEF could incorporate in GEF-7, considering the GEF's programming strategy and the needs of indigenous peoples.

The evaluation reached the following conclusions:

- The GEF recognizes indigenous peoples as important stakeholders in its mission to tackle global environmental issues.
- Recognition of the presence of indigenous peoples by national governments is axiomatic to the application of the rights of indigenous peoples. In some country contexts, the absence of recognition poses as a challenge to the GEF partnership.
- At the partnership level, the participation of indigenous peoples is well secured in GEF consultation arrangements and is advancing GEF's engagement with indigenous peoples. In general, GEF Agencies are in alignment with the obligations under GEF Minimum Standard 4: Indigenous Peoples.
- The GEF safeguard on indigenous peoples is somewhat restrictive and there is ambiguity around the GEF's approach to FPIC. The GEF's ability to track the application of Minimum Safeguard 4 and the benefits that flow from its engagement with indigenous peoples is limited by the lack of monitoring information.
- The IPAG provides relevant advice to the GEF Secretariat on indigenous peoples issues. It fulfills an important technical advisory and dissemination role. However, operational limitations require attention, while opportunities for an expanded advocacy role remain limited.
- The GEF's ability to systematically gather evidence on elements of its engagement with indigenous peoples is hampered by the lack of specificity within the Project Management Information System (PMIS). The proportion of full- and medium-size projects that include indigenous peoples has increased substantially since the beginning of the GEF, both in terms of project numbers and amount of investment.
- The SGP, implemented by UNDP, is the primary modality for the GEF's engagement with indigenous peoples.

The evaluation recommended that the GEF

- a. Establish and strengthen dedicated funding opportunities for indigenous peoples projects/ organizations;
- b. Update relevant policies and guidelines to reflect best practice standards concerning indigenous peoples, including a rights-based approach to engagement;
- c. Facilitate dialogue between indigenous peoples and local communities and GEF government focal points;
- d. Monitor application of Minimum Standard 4 and the indigenous peoples portfolio; and
- e. Review the IPAG's role for operational constraints.

### 6.3 Extent to which recommendations have been taken up

There has been good progress against the recommendations.

#### ESTABLISHING AND STRENGTHENING DEDICATED FUNDING OPPORTUNITIES (RECOMMENDATION A)

The Inclusive Conservation Initiative (ICI) is roundly welcomed as a breakthrough funding initiative designed for local impact, GEF-wide learning, and scale out/up. The initiative is seen as precedent setting, that is, complementary to but larger in project scale than the SGP, dedicated to creating indigenous people-designed and implemented projects in biodiversity hotspots. IPAG members see in it, a “chance to test and showcase how it can work to have indigenous peoples at the centre of projects.”<sup>2</sup>

<sup>2</sup>GEF IEO interviews with IPAG members.

Five critical ingredients for success are: maintenance of a dual focus on the project and policy/strategy levels; strong emphasis on indigenous peoples organization and network capacity development; youth leadership development; lateral connections to other GEF-supported activities and to OFPs; and robust, culturally attuned monitoring and evaluation practice.

From key informants closely connected to or representing indigenous peoples (within the IPAG and among Agencies), the ICI is part of a welcome trend in a wheel of change that moves slowly. Here, the STAR allocation practice is seen as a principal factor.

Other parts of indigenous peoples programming are developing at a modest pace overall. Here, the SGP—including the Indigenous Peoples Fellowship Program and support for the Global Support Initiative for Indigenous Peoples and Community-Conserved Territories and Areas (ICCAs)—is highlighted. Data gathered from the annual monitoring report and SGP scorecard show what is described in the 2021 evaluation of the SGP as a “gradual” uptick since 2016–17 (~70 percent) in the number of SGP projects completed annually with indigenous peoples. Today projects with a focus on indigenous peoples make up about 20 percent of the total SGP portfolio (GEF IEO 2021). A factor in this growth is an increase in cofinancing contributions to indigenous peoples programming including that within the ICCAs.<sup>3,4</sup>

<sup>3</sup>The GEF, the German government, and UNDP cofinance the Global Support Initiative (GSI: Support to Indigenous Peoples and Local Communities Conserved Areas and Territories) through the GEF SGP. Its work is referenced to the achievement of targets contained in the CBD Aichi 2020 framework, and operates in at least 26 countries around the globe. Information on the ICCA consortium can be found on the [ICCA Global Support Initiative](#) webpage.

<sup>4</sup>In its recent publication to celebrate 25 years of engagement with indigenous peoples, the SGP tracks

Trendlines for the number of projects and levels of investment focused on indigenous peoples were favorable through GEF-5 and into GEF-6. The evaluation has no information to suggest that there has been a change in trajectory since 2018 but has been unable to secure the data to confirm that this is the case. Commentary regarding the difficulties encountered updating portfolio data is discussed with regard to Recommendation d, on [page 81](#).

## UPDATE RELEVANT POLICIES AND GUIDELINES (RECOMMENDATION B)

Indigenous leaders are favorable toward the revised ESS and accompanying guidelines as they pertain to indigenous peoples (discussion of the revision can be found in [chapter 7](#)). The policy is considered contemporary and appropriate for the GEF partnership.

The ESS Guidelines are described as helpful in defining roles and responsibilities for screening and managing risks across the nine minimum standards. By contrast, the documents are perceived as limited in the guidance they give specifically to the minimum standard associated with indigenous peoples. Leaders stress that for Minimum Standard 5 (Minimum Standard 4 in the antecedent ESS policy), project managers in their widely varied settings need practical guidance (with case examples) on when and how to engage indigenous peoples and local communities in the service of FPIC.

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the percentage of SGP projects that support indigenous people over the period 1992–2018 (UNDP 2020). Over the period, indigenous peoples projects make up between 25 percent and 29 percent of total projects (indigenous peoples and non-indigenous peoples countries combined), and between 32 percent and 42 percent of projects in indigenous peoples countries. In both instances, the trend is positive.

## FACILITATE DIALOGUE BETWEEN INDIGENOUS PEOPLES AND LOCAL COMMUNITIES AND GOVERNMENTS (RECOMMENDATION C)

Agencies are seen as important drivers/intermediaries in the bid to ensure that country governments recognize and engage indigenous peoples. Observations on performance in this regard are mixed. At worst, “exclusion by design” is observed, as are underwhelming applications of FPIC. At the other end of the continuum, indigenous peoples are authentically engaged in learning exchanges and collaborations ([box 6.1](#)).

Overall, indigenous leaders see improvements in Agency readiness to take up FPIC and other provisions under the UN Declaration on the Rights of Indigenous Peoples (UNDRIP). Key indicators of improvement are Agencies’ involving indigenous peoples in both program and project design and governance, and in institutional-level consultations and meetings. Indigenous leaders look to Agencies to have solid working relationships with NGO/CSOs with “credible histories” of working with indigenous peoples and local governments. The development of grievance mechanisms and the quality of the processes they follow are also identified as indicators of agency readiness to engage indigenous peoples.

As is the case with the Policy on Stakeholder Engagement, the most prominent constraints on good implementation are Agency capacity and/or predisposition, national government recognition of indigenous peoples, and the availability of time and budget to engage properly. These are discussed in [chapter 4](#).

Overall, indigenous leaders draw a distinction between being policy compliant, on the one hand, and being effective in implementing minimum standards, on the other. At the moment, they see the GEF as best prepared to address the former

### Box 6.1 Recognition of traditional indigenous conservation management: ICCAs in the Philippines

An estimated 85 percent of the biodiverse areas of the Philippines lie within ancestral domains. Within these domains are indigenous peoples and local communities conserved areas and territories (ICCAs). Indigenous peoples put high spiritual and cultural values on ICCAs, hence their protection and conservation. They are found across the globe, and coincide with 80 percent of the planet's biodiversity.<sup>1</sup> Major threats to species-rich areas like these in the Philippines come from habitat degradation, land conversion, increasing population, inappropriate land use planning, overharvesting of resources, mining activity, and infrastructure expansion, among other factors.

Protected areas form the main Philippine government strategy in biodiversity conservation through the Expanded National Integrated Protected Areas Systems (E-NIPAS, formerly NIPAS), but the strategy has been constrained by such factors as: lack of representation from communities, policy conflict, and lack of funding. These hamper decision making. At the same time, large tracts of high conservation value areas lie outside of protected area boundaries, while more disturbed and low biodiversity value areas lie within these boundaries.

From 2009 to 2014, a medium-size project known as New Conservation Areas in the Philippines (NewCAPP; GEF ID 5389, UNEP) was implemented by the UNDP through the Department of Environment and Natural Resources, Protected Areas and Wildlife Bureau (DENR-PAWB, now Biodiversity and Management Bureau or BMB). The Philippine ICCA Project (PICAPP) followed from 2016 to 2019. With full and effective participation from indigenous peoples

and their communities through the Philippine ICCA Consortium, both projects included: identification and mapping of ICCAs utilizing traditional knowledge and science, documentation of indigenous knowledge systems and practices, and an inventory of resources to determine the state of health of forests. Findings were used in community conservation plans. Both projects sought to diversify conservation management practices.

At its close in 2019, PICAPP project was evaluated positively both for the additional lands secured and for its success in bringing state and nonstate actors to recognize ICCAs as complementary to the country's protected area system. New significance was given to the [Indigenous Peoples Rights Act of 1997](#) which states: "The ICCs [Indigenous Cultural Communities] and IPs [indigenous peoples] concerned shall be given the responsibility to maintain, develop, protect and conserve such areas in accordance to their indigenous knowledge, systems, practices and customary laws with full and effective assistance of government agencies" (IPRA, section 58). Besides leading the Asian region in the forefront of inclusive conservation, the PICAPP project is a recipient of the Development Aid of the Year Award 2019.

The experience of the NewCAPP and PICAPP projects has been shared with a project delegation from Myanmar and has paved the way for a new GEF-supported initiative expanding ICCA development in the Philippines. It has also triggered adoption of ICCA work by other NGOs and funding agencies such as the United States Agency for International Development (USAID).

<sup>1</sup> For an introduction to ICCAs, see the [ICCA Consortium](#) website. The following characteristics identify an ICCA: (1) there is a close and deep connection between a territory or area and an indigenous people or local community; (2) the custodian people or community makes and enforces decisions and rules (e.g., access and use) about the territory, area or species' habitat through a functioning governance institution; and (3) the governance decisions and management efforts of the concerned people or community contribute to the conservation of nature (ecosystems, habitats, species, natural resources), as well as to community well-being.

**Sources:** GEF Portal, [Expanding and Diversifying the National System of Terrestrial Protected Areas](#) (NewCAPP; GEF ID 3606); UNDP 2016; and "[Indigenous peoples in the Philippines leading conservation efforts](#)" August 19, 2019, feature story on the GEF website.

and more challenged in addressing policy effectiveness in relation to engagement with indigenous peoples. There are two aspects. One pertains to the specificity of data tracking at the project level and its aggregation at the portfolio level, and the other pertains to the above-mentioned constraints on the implementation of ESS policy. All lie at the edge or beyond the edge of the GEF's sphere of control.

With its portfolio spread across key convention areas and its reach through multiple Agency delivery channels, the GEF is considered uniquely suited to “mainstream” engagement and safeguard policies through a knowledge sharing and relationship brokering role. As observed in [chapter 4](#), there are simultaneously in the partnership stakeholder groups with experience to share and those with information/knowledge gaps to fill. Included in the former are indigenous peoples organizations and indigenous leaders as well as dedicated staff in some of the larger GEF Agencies.

Improving dialogue between indigenous peoples and local communities and GEF government focal points remains a work in progress. There are project-level successes, but country contexts can quickly change. Understanding that each country context is unique and often dynamic, indigenous leaders suggest the following for the GEF to build shared understanding: showcase success, notably ICCAs (showing advantages of inclusive approaches); ensure that Agencies are using the influence that they may have built with host governments, and that they can fulfill ESS and Stakeholder Engagement Policy commitments; make high-profile public statements in support of UNDRIP/FPIC; and continue/increase attention to youth leadership development and SGP (to build country capacity).

## **MONITOR IMPLEMENTATION OF MINIMUM STANDARD 4 (RECOMMENDATION D)**

Progress is evident in the monitoring of Minimum Standard 5 and of the indigenous peoples portfolio. Agency reporting on safeguards is now a requirement and the tagging of indigenous peoples-related projects has improved. In GEF-7, projects are identifiable at the PIF and CEO endorsement stage with the inclusion of an “indigenous peoples” identifier on a taxonomy sheet that supports the project templates. The reliability of this identifier remains to be established, however. Earlier templates are being used in some GEF-7 project submissions and there are indications that proponents are overlooking the identifier altogether in their submissions. This was corroborated during the portfolio review carried out for this evaluation. GEF-6 projects that engage indigenous peoples can be identified by the answers to questions about stakeholder engagement in the project templates, but they are not searchable on the GEF portal database.

Overall, Indigenous leaders suggest that it is too soon to see a systemic improvement in monitoring of the indigenous peoples portfolio. Regarding Minimum Standard 5, they perceive the processes for collecting, analyzing, and aggregating data on the engagement of indigenous peoples as not yet sufficiently in place to meet policy requirements. Indicator work initiated by the IPAG that could give some shape to program and project reporting on engagement has not yet been carried to fruition, though it is understood that other Agencies, such as the World Bank, are moving this work forward.

## **REVIEW THE IPAG ROLE FOR OPERATIONAL CONSTRAINTS (RECOMMENDATION E)**

The IPAG is operationally stable and strong, that is, strategically focused, with a dedicated and

connected membership. By all accounts, it is well supported by the GEF Secretariat administratively and with high-level advocacy. The IPAG has earned credibility among those who know it though its value proposition is not widely known either within or beyond the Partnership.

The IPAG's terms of reference have not changed appreciably since its formation in 2013. Since the evaluation, they were reviewed and deemed appropriate with a single adjustment to the terms of office. These were extended from two to three years with no change to the limitation of two consecutive terms, citing the practices of analogous working groups and the current need for continuity and stability as the IPAG concentrates on the development and launch of the ICI. Since the evaluation, IPAG has inducted a member to represent small island developing states, addressing a perceived gap in coverage.

More attention has been paid to the more operational work programs that span two to three years. Since the evaluation, these have focused the IPAG's attention on "high leverage" activities associated more explicitly with GEF's programming directions. This is reflected in the summary of the IPAG's major activities since 2017 ([box 6.2](#)). Operationally, the IPAG has also taken up the practice of assigning lead roles to IPAG members.

IPAG members perceive that the CSO Network-IPAG relationship yields mutual benefits. The CSO Network provides a means by which IPAG inputs can be heard at the Council. At the same time, there is recognition that while indigenous peoples organizations fall within the subset of CSOs, there are important differences between the two that can be a source of tension in the GEF context. NGOs might be more focused on environment and conservation, while the focus of indigenous peoples might be more on livelihood and customary practices. NGOs may have a broad and diffuse focus while the focus of IPOs is more narrowly defined.

It is also the case that the IPAG is, by and large, a technical body mandated by the GEF while the CSO Network is an independent entity with more of a political outlook. Adept facilitation of the relationship with shared purpose is therefore deemed essential to optimize the complementarity of the two bodies.

Members of the IPAG observe that in the design and roll-out of the stakeholder engagement, ESS, and gender equality policies, sensitivity is required to the interplay of Western and indigenous epistemologies across the partnership. Four examples illustrating the potential for the former to overpower the latter are: in the language and phrasing of questions on request for proposal templates, the management of time in GEF forums to promote dialogue, the identification of opportunities for the convergence of traditional knowledge and science-based knowledge in projects, and at the intersection of customary rights and practices on the one hand and Western notions of conservation practice or gender equality, on the other.

Annual funding for the IPAG has remained stable since the 2018 evaluation. The GEF covers costs associated with staff and consultant time in support of the IPAG's mandate, with annual IPAG meetings held in concert with Council meetings, and other meetings where the IPAG is present. Eligible meeting expenses include those for travel, accommodation, and catering where the IPAG is holding side events. The pandemic of 2020–21 has made it necessary to convene the IPAG online. This has resulted in shorter, more frequent sessions as well as lower costs. Managing time zone differences is a challenge, however, and members argue while the online format provides some benefits and flexibility, it does not substitute for face-to-face interaction.

The volunteer ethos of the IPAG is valued by the IPAG membership, but is felt by some in the group to be insufficiently addressed in the delineation of the roles of "advisor" and "indigenous peoples

### Box 6.2 Major activities of the IPAG, 2017–20

Since 2017, the IPAG has concentrated its activities in the following areas:

- **GEF policy/strategy.** Representation on relevant committees and providing written and verbal input to the ESS, Gender Equality, and Stakeholder Engagement Policy revisions; discussion of the merits of creating a stand-alone Indigenous Peoples Policy; inputs provided GEF the development of the GEF's Private Sector Strategy;
- **Advisory support in the planning and development of the ICI.** Design of the ICI as proposed in the GEF-7 strategy document, the call for proposals for the implementing Agencies, the selection of the Agencies, working with the selected Agencies on the PIF, and participation on the Interim Steering Committee of the ICI;
- **Advisory support on indigenous peoples engagement under the Minamata Convention on Mercury.** High-level dialogue with the convention CEO and staff on issues and considerations for indigenous peoples in relation to mining activities;
- **Collaborations across GEF-7 program areas.** Consultations and follow-up with program focal points at the GEF Secretariat (e.g., biodiversity, international waters, chemicals and waste, land degradation, Congo Basin Initiative, SGP) on relevant matters regarding indigenous peoples and these focal areas.
- **Indigenous peoples–focused side events at GEF and select convention events (e.g., CBD, United Nations Permanent Forum on Indigenous Issues).** Prominently at the December 2020 pre-Council consultation, showcasing the application of traditional knowledge in collaboration with the CSO Network and GEF Secretariat.
- **Design of and participation in the GEF Task Force on COVID-19 session on indigenous peoples and local communities.** Drawing together from the partnership an understanding of the main challenges faced by indigenous peoples regarding COVID-19 and the GEF's role in assisting indigenous peoples in their efforts to manage their lands and protect biodiversity given impacts of COVID.
- **Briefings to the GEF.** On proceedings of the United Nations Permanent Forum on Indigenous Issues and other indigenous peoples forums.

Source: IPAG minutes and briefing papers.

member,” and in the reckoning of the time and cost burden on those who are not supported by any institution to participate in the group. Universally, IPAG members have a visceral sense of the limitation on their role, mentioning the often time-sensitive nature of requests on them to review and prepare for IPAG business.

Requests on the IPAG are increasing. This relates to the IPAG's emergent role as “champion” and resource for inclusive conservation under GEF-7 and to the opportunities opening up under GEF's other focal area priorities to support implementation of the updated ESS and stakeholder engagement policies, i.e., application of FPIC and

other inclusive practices, and the integration of traditional knowledge.

There are options to extend the IPAG role into the realm of program/project-level advisor/problem solver. In its early stages, the ICI is setting a precedent in this regard. Similarly, there are perceived opportunities to provide a similar kind of support to Agencies to the extent that they are developing their own capabilities in relation to engagement with indigenous peoples. Here, assistance related to the development of grievance processes is mentioned as one area where the IPAG could potentially add value. Deeper engagement at a regional/country level through the Country Support Program

is viewed as an effective way of knowledge sharing and relationship building among OFPs, CSOs, and Agencies. Here, there are perceived opportunities to regionalize discussions of the last year at a global level, highlighting possible responses to the disproportionate impacts of COVID-19 on vulnerable populations and showcasing the knowledge and skills indigenous leaders can bring to this. Of course, the constraints posed by the current organizational model of IPAG would need to be factored into any elaboration of the IPAG role. And on this, there are two dimensions that would need consideration: the honoring of the volunteer ethos that is felt to be integral to the mandate, and the need to compensate for expenses.

Potential role adaptations identified by IPAG members and others familiar with the advisory body, include the following:

- Increasing meeting frequencies upward from two per year (this has occurred out of necessity since early 2020 because of COVID-19);
- Increasing representation to two persons per region with a possible third as an alternate (with attention to gender balance and age range)—this would diversify the experience base, distribute workloads and facilitate succession planning;
- Regionalizing the IPAG itself, such that the advisory function can be more attuned to the needs and opportunities of GEF constituencies, yet still connected globally;
- Placing an indigenous person in a cultural advisor role at the GEF Secretariat to support the IPAG and be a resource for the GEF’s engagement with indigenous peoples across the programming areas;
- Engaging additional consultant support to the IPAG to support research and preparation of knowledge products; and
- More intentional linkages made between the IPAG, the indigenous units of GEF Agencies, and

indigenous focal points in peer organizations (such as peer climate funding mechanisms).

## 6.4 Summary

- The ICI is roundly welcomed as a breakthrough funding initiative designed for local impact, GEF-wide learning, and scale out/up.
- The ICI is part of a welcome trend in a wheel of change that moves slowly. Here, the STAR allocation practice is seen as a factor. Other parts of indigenous peoples programming are also seen as developing, albeit more slowly (the indigenous peoples fellowship and the SGP are highlighted in this regard).
- Indigenous peoples leaders are generally favorable toward the revised ESS policy/guidelines. The policy is considered contemporary and appropriate for the partnership. The accompanying guidelines are described as “general” and in need of elaboration with case examples.
- With its portfolio spread across key convention areas and its reach through multiple agency delivery channels, the GEF is considered uniquely suited to “mainstream” engagement and safeguard policies.
- Improving dialogue between indigenous peoples/local communities and GEF government focal points remains a work in progress. There are project-level successes, but country contexts can quickly change.
- Agencies are seen as important drivers/intermediaries in the bid to ensure that country governments recognize and engage indigenous peoples. Observations on performance in this regard are mixed. At worst, “exclusion by design” is observed, as are overwhelming applications of FPIC. At the other end of the continuum, indigenous peoples are authentically engaged in partnerships with sharing and two-way learning.



- Progress is evident in the monitoring of minimum standards related to the indigenous peoples portfolio. While Agency reporting on safeguards is now a requirement, and tagging of indigenous peoples-related projects has improved, indigenous peoples leaders suggest that it is too soon to see a systemic improvement. A renewed commitment to indicator development is warranted in this regard.
- The IPAG is operationally stable and strong, that is, strategically focused, with a dedicated and connected membership. By all accounts it is well supported by the GEF Secretariat administratively and with high-level advocacy. The

IPAG has earned credibility among those who know it though its value proposition is not widely known within or beyond the partnership. With requests on the IPAG increasing, the current membership has ideas on how the IPAG's impact could be enhanced in the service of supporting implementation of the ESS and stakeholder engagement policies.

# Environmental and social safeguards

**I**n 2017 the GEF IEO undertook a Review of the GEF Policy on Agency Minimum Standards on Environmental and Social Safeguards (GEF IEO 2018a). A key recommendation of the review was for the GEF to consider updating the GEF Minimum Standards in light of a range of identified thematic coverage gaps. In 2018, the GEF adopted an updated Policy on Environmental and Social Safeguards, with an effective date of July 1, 2019 (GEF 2018c).

This chapter provides an update to the earlier IEO review, examining the measures taken by the GEF in response to its recommendations and reviewing the scope of the Minimum Standards of the updated 2018 GEF safeguards policy, as well as other findings from key interviews and the portfolio analysis undertaken for this evaluation.

## 7.1 Background and context

The GEF Policy on Agency Minimum Standards on Environmental and Social Safeguards (GEF 2011a) was approved in November 2011 at the 41st Council meeting. The provisions for the GEF Minimum Standards were established in the guideline document Application of Policy on Agency Minimum Standards on Environmental and Social

Safeguards. The GEF Minimum Standards had the objective of preventing and mitigating any unintended negative impacts to people and the environment that might arise through GEF operations. According to the 2011 policy, the minimum standards used the approach and criteria contained in the World Bank's safeguards policy<sup>1</sup> as a starting point while also building on GEF's Public Involvement Policy. There were eight minimum standards: environmental and social assessment; protection of natural habitats; involuntary resettlement; indigenous peoples; pest management; physical cultural resources; safety of dams; and accountability and grievance systems.

In 2017, the IEO presented its review of the GEF Policy on Agency Minimum Standards on Environmental and Social Safeguards (GEF IEO 2018a). The review identified a range of gaps in thematic coverage of GEF safeguards that appeared germane for the risks present in the GEF portfolio. Consequently, one of the recommendations of the evaluation was to review and potentially update the GEF Environmental and Social Safeguards

<sup>1</sup> Operational Policy 4.00: Piloting the Use of Borrower Systems to Address Environmental and Social Safeguard Issues in Bank Supported Projects.

policy. The Council endorsed the recommendation and requested the Secretariat to prepare a plan to review the GEF’s Minimum Standards on Environmental and Social Safeguards (GEF 2017e).

The GEF Secretariat developed a plan to review the GEF’s Minimum Standards that was endorsed at the 53rd Council Meeting (GEF 2017f). It established a working group to develop the new safeguards policy and posted a draft of the updated policy for public comment.<sup>2</sup>

The 55th GEF Council approved an updated Policy on Environmental and Social Safeguards (GEF 2018c) in December 2018. The policy effectiveness date was July 1, 2019, for new activities and for ongoing activities the policy became effective on July 1, 2020. The updated policy reflected specific recommendations from the IEO review and from the IEO Evaluation of GEF Support to Indigenous Peoples. Guidelines for the policy (GEF 2019a) were presented as an information document to the Council in December 2019.

## 7.2 Overview of 2017 IEO review and extent to which recommendations were addressed

The 2017 IEO review focused on four questions: (1) the extent to which the GEF Safeguards have added value to the GEF Partnership; (2) the degree to which they are aligned with relevant international best standards and practices; (3) how the GEF is informed of safeguard related risks in supported

operations; and (4) recommendations on how the GEF safeguards might evolve in coming years.

The review found that the GEF Minimum Standards have served as an important catalyst among many GEF Agencies—both existing and newly accredited—to strengthen existing safeguard policies and, in a number of cases, to adopt comprehensive safeguard policy frameworks, together with supporting implementation systems and procedures. By establishing a set of minimum requirements, the GEF Safeguards policy contributed to more harmonized approaches in managing project-level environmental and social risks and impacts across the GEF partnership.

When adopted in 2011, the key principles upon which the GEF Minimum Standards were based reflected a consensus on key operational safeguard principles. However, the intervening years witnessed a number of changes regarding both the breadth and depth of safeguard frameworks adopted by a wide range of institutions, including many GEF Agencies. The Review identified a range of thematic gap areas across the Minimum Standards, identified areas where safeguards monitoring and reporting could be strengthened, and noted the potential for the GEF to strengthen knowledge sharing on safeguards in the partnership. The review included three general recommendations addressing these findings, with a number of supporting recommendations for each. The three overarching recommendations were: (1) review the 2011 GEF Minimum Standards on Environmental and Social Safeguards; (2) improve safeguards monitoring and reporting; and (3) support capacity development, expert convening and communications on safeguards. The following paragraphs examine the degree to which these recommendations were addressed by the updated 2018 policy.

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<sup>2</sup> The Secretariat noted that it invited Council members, alternates and advisors; focal points in recipient countries; and representatives of Agencies, convention secretariats, civil society, and the Indigenous Peoples Advisory Group to join a multistakeholder Working Group on Environmental and Social Safeguards. As of August 2018, 48 stakeholders had joined the Working Group. See GEF (2018g).

## 2017 RECOMMENDATION 1: REVIEW THE GEF SAFEGUARDS

The 2018 Policy on Environmental and Social Safeguards addressed nearly all of the main thematic gap areas highlighted in the IEO 2017 review. This included expanding the Minimum Standards for Agency Policies, Systems, and Capabilities to new areas, including labor and working conditions; community health, safety, and security; climate change and disaster risks; disability inclusion; disadvantaged or vulnerable individuals or groups; and adverse gender-related impacts, including gender-based violence and sexual exploitation and abuse. The policy strengthened protections for indigenous peoples, requiring Agencies to ensure that FPIC of affected indigenous peoples is obtained under specified circumstances. It expanded provisions related to impacts on cultural heritage, pollution prevention, resource efficiency, and sustainable management of living natural resources.

Nevertheless, some identified gap areas from the 2017 IEO review were not or were only partially included in the updated policy. These areas and other points regarding the scope of the updated 2018 policy are addressed in the following sections.

## 2017 RECOMMENDATION 2: IMPROVE SAFEGUARDS MONITORING AND REPORTING

The 2017 IEO review recommended improvements in how the GEF tracks and reports on social and environmental risks at the portfolio level, ensuring a flow-through of monitoring information on the implementation of safeguards. It noted that the GEF should consider tracking environmental and social risks at the portfolio level; have Agencies provide information on safeguards risk categorization assigned to programs/projects and keep the GEF informed of the safeguards implementation issues through monitoring and reporting; and

consider a mechanism for Agency reporting on relevant cases submitted to their grievance and accountability mechanisms.

The updated 2018 GEF policy includes a number of improvements to the monitoring and reporting of safeguard issues during program/project implementation. The policy sets out a role for the GEF Secretariat to review program/project documentation submitted by GEF Agencies to assess whether environmental and social (E&S) risks, impacts, and management measures are adequately documented (GEF 2018c, para. 13). The GEF-7 templates and project-program “Review Sheets” prompt Agencies to provide basic information on E&S risks.<sup>3</sup>

In December 2019 the GEF approved Guidelines on the GEF Policy on Environmental and Social Safeguards (GEF 2019a). The document provides guidance to GEF Agencies on how to address the program and project-level requirements set out in the GEF safeguards policy at various project stages. The guidelines indicate that, at the PIF stage, Agencies are to provide information on the overall program/project E&S risk classification, a description of the types of identified risks, and any available early E&S screening reports and indicative management plans. This information is to be updated at the CEO endorsement/approval stage, in particular any E&S management plans, the

<sup>3</sup> GEF-7 templates require GEF Agencies to indicate “risks, including climate change, potential social and environmental risks that might prevent the project objectives from being achieved *or may be resulting from project implementation*, and, if possible, propose measures that address these risks to be developed during project design (PIF FSP)” [emphasis added to indicate updated language which has not been added to other program/project templates beyond the full-size project PIF template, an important omission]. The PIF stage Review Sheet includes the question, “Are environmental and social risks, impacts and management measures adequately documented at this stage and consistent with requirements set out in SD/PL/03?”

submission of which are considered mandatory for any programs/projects rated “high” or “substantial” risk (GEF 2019a, para. 14.iv).

The policy also requires Agencies to provide information on the implementation of relevant environmental and social management measures at project midterm, if applicable, and at project completion (GEF 2018c, para. 15). Curiously, the policy does not require Agencies to provide such information in their annual PIRs unlike the Policy on Gender Equality and the Policy on Stakeholder Engagement. This misalignment with the other policies appears to be a relevant gap as annual reporting on safeguards implementation would provide the GEF with more up-to-date information on environmental and social risks and implementation of necessary mitigation and management measures (this may be particularly salient where “framework” approaches are used and specific E&S management plans are still forthcoming). In practice, however, (as noted in the portfolio review for this evaluation), it appears Agencies are including at least some information on safeguards in their PIRs.

The Guidelines provide some benchmarks for reporting on safeguards at program/project midterm and completion. At midterm, Agencies are to include a report on implementation progress of E&S management measures that were outlined at CEO endorsement/approval, any revisions to the overall program/project risk rating or identified types of risks, and any revised or new E&S assessment reports or management plans. At completion, Agencies are also to assess implementation of management measures and their effectiveness and lessons learned (GEF 2019a, paras. 18–19).

At the portfolio level, the updated 2018 policy also requires the Secretariat to annually report to the Council on the implementation of the policy, including the type and level of environmental and social risks and impacts identified in GEF-financed

programs/projects and the management of such risks and impacts during implementation and at completion (para. 17 of the Policy). The GEF portal includes tools for providing this information.

In November 2020 the Secretariat released a progress report that contains information on risk classification and types of risks across the GEF portfolio, based on self-reporting by Agencies, as mandated by the updated policy (GEF 2020b). The Secretariat report indicates that for the June 2020 work program (128 PIFs/PFDs), the initial risk categorization showed that 11 percent of projects were rated high/substantial risk, 54 percent were rated moderate risk, and 28 percent were rated low risk. While the report acknowledges that there may be inconsistencies across Agency risk categorization systems, this is an important step in gaining an overview of the scale of potential environmental and social risks in the GEF portfolio. At this early stage of implementation of the new policy, there is no indication that the GEF Secretariat assigns, for example, risk flags to high-risk projects for heightened monitoring and reporting. The Secretariat has noted that it is committed to monitoring projects for E&S risks/impacts, however a mechanism for doing so has not been elaborated.

The progress report also indicated the types of identified risks that were associated with all of the minimum standards of the updated policy, with the most identified risks related to climate change and disaster risks, followed by restrictions on land use and involuntary resettlement, biodiversity, and community health, safety, and security. Similar to the above, this is an important step in gaining an overview of the most prevalent types of environmental and social risks across GEF-financed programs/projects.

Additionally, the updated 2018 policy (GEF 2018c, para. 15) also requires Agencies to promptly report to the Secretariat any cases reported to their respective accountability, grievance, or

conflict resolution mechanisms in connection with GEF-financed programs or projects. The Secretariat is to post this information on the GEF website, notify the Council, and present a summary of such cases as part of its annual reporting on implementation of the policy (GEF 2018c, para. 17; GEF 2020c). The first annual report of Agency grievance cases related to GEF-financed programs/projects, covering all pending cases up to November 2020, included 15 identified cases and 5 other cases requiring confidentiality.

The highlighting of the magnitude and types of safeguard-related risks and impacts across the portfolio, as well as heightened attention to grievance cases, may help drive greater attention to safeguard issues during project implementation. However, given that the updated policy only went into effect in July 2019, it is too early to evaluate the effect of this increased level of safeguards monitoring and reporting.

### **2017 RECOMMENDATION 3: SUPPORT EXPERT CONVENING AND COMMUNICATIONS ON SAFEGUARDS**

The 2017 IEO review noted that GEF Agencies would welcome increased opportunities for knowledge sharing and capacity support regarding challenges in addressing safeguards issues. The review recommended that the GEF explore utilizing its convening role to promote knowledge sharing, strengthen its own safeguard-related expertise, leverage relevant expertise across the GEF partnership, and consider how best to communicate the GEF's policy requirements with country partners to further build a shared understanding on the need for effective safeguards implementation.

To date there has been little progress in expanding GEF's capacity support, expert convening, and communications to address safeguards challenges and to promote more effective implementation.

Aside from orientation sessions on the GEF policies, few Agency interviewees could cite any focused safeguard-related knowledge sharing organized by the GEF save for the September 2020 training on climate risk screening organized by the GEF STAP and World Bank.<sup>4</sup> Agency representatives, particularly among smaller Agencies, expressed continued interest in such knowledge exchange and feel that the GEF is well placed to help leverage such cross-partnership learning.

The emphasis here is on the GEF's knowledge sharing/brokering role. As noted in [chapter 3](#), the GEF partnership is a unique source of expertise across multiple challenging safeguard issue areas. While knowledge sharing contributes to capacity development, broader capacity support programs (e.g., institutional strengthening, training) may present a drain on limited GEF resources and could be considered in limited circumstances. The GEF could consider increasing its facilitative role in targeted knowledge sharing on challenging safeguard-related issues (e.g., labor and working conditions, community health and safety, FPIC, addressing gender-based violence).

In its progress report on implementation of the updated policy, the Secretariat noted that it may be beneficial to exchange experiences among the GEF Agencies about ESS risk identification and ratings, environmental and social assessments, and management plans. The report stated that it "might also be beneficial to put in place a kind of 'Community of Practice' to share lessons learned across GEF Agencies' ESS practices related to dealing with high-risk projects and grievances, and/or addressing some of the new ESS minimum standards including Gender-Based Violence; and Free, Prior and Informed Consent (FPIC) etc." (GEF 2020b,

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<sup>4</sup> See GEF and World Bank Training, [Climate Risk Screening & Climate Change Knowledge Portal](#), September 17, 2020.

para. 28). As noted above, some Agency representatives would welcome this development.

### 7.3 Review of scope of the 2018 Environmental and Social Safeguards Policy

As noted above, the updated 2018 Policy on Environmental and Social Safeguards addressed nearly all of the main thematic coverage gaps that were identified in the 2017 IEO review. This involved both expanding the coverage (and titles) of existing Minimum Standards as well as the adoption of new ones, namely MS7 Resource Efficiency and Pollution Prevention, MS8 Labor and Working Conditions, and MS9 Community Health, Safety, and Security, as outlined in [figure 7.1](#).

MS1 on Environmental and Social Assessment, Management and Monitoring was revised and expanded to address climate change and disaster risks; disability inclusion; disadvantaged or vulnerable individuals or groups; and adverse gender-related impacts, including gender-based violence and sexual exploitation and abuse, among other things.

The updated policy strengthened protections for indigenous peoples (MS8), requiring Agencies to ensure that the FPIC of program/project-affected indigenous peoples is obtained under specified circumstances. MS3 on Biodiversity was broadened from the earlier natural habitats standard, incorporating requirements on sustainable management of living natural resources, among other things.

The updated policy also maintained, and slightly expanded, a set of prohibitions/restrictions specific to GEF-financed activities. These include: (1) not financing activities that involve adverse impacts on critical habitats (a stronger provision than the previous “no degradation or conversion” principle); (2) a new provision on not financing activities

that contravene applicable international environmental treaties or agreements; (3) no support for activities that introduce or use potentially invasive, non-indigenous species (same as previous policy); (4) a broader ban on use or trade in any substances listed not only under the Stockholm Convention on Persistent Organic Pollutants but also other chemicals or hazardous materials subject to international bans, restrictions, or phaseouts;<sup>5</sup> and (5) continuation of the prohibition on funding for construction or rehabilitation of large or complex dams. The updated policy dropped a previous prohibition on including costs of physical relocation of people in project proposals.

In terms of overall structure and coverage of thematic safeguard standards, the updated policy aligns with the integrated safeguard frameworks that have been adopted by many development institutions over the past decade. [Figure 7.2](#) highlights this thematic alignment with four large multilateral finance institutions; it should be noted that to date the E&S safeguards framework of the GCF follows that of the International Finance Corporation.

### 7.4 Safeguard issues for further consideration

The Minimum Standards of the GEF safeguards policy are used primarily as a benchmark for assessing compliance of the safeguard frameworks of GEF Agencies (some GEF Agencies noted that they often reference the GEF safeguards policy in internal deliberations). To function as a benchmark, the requirements of the GEF Minimum Standards largely focus on key principles that

<sup>5</sup> Specifically, chemicals or hazardous materials subject to international bans, restrictions, or phaseouts due to high toxicity to living organisms, environmental persistence, potential for bio-accumulation, or potential depletion of the ozone layer, consistent with relevant international treaties and agreements.

**Figure 7.1 Update of GEF environmental and social standards**



**Figure 7.2 Environmental and social safeguards frameworks of comparator institutions**

IFC Performance Standards (2012)	World Bank Environmental and Social Framework (2016)	EBRD Environmental and Social Policy (2019)	IDB Environmental and Social Policy Framework (2020)
<ol style="list-style-type: none"> <li>1. Assess &amp; Management of E&amp;S Risks and Impacts</li> <li>2. Labor and Working Conditions</li> <li>3. Resource Efficiency and Pollution Prevention and Management</li> <li>4. Community Health, Safety and Security</li> <li>5. Land Acquisition and Involuntary Resettlement</li> <li>6. Biodiversity Conservation and Sustainable Management of Living Natural Resources</li> <li>7. Indigenous Peoples</li> <li>8. Cultural Heritage</li> </ol>	<ol style="list-style-type: none"> <li>1. Assess &amp; Management of E&amp;S Risks and Impacts</li> <li>2. Labor and Working Conditions</li> <li>3. Resource Efficiency and Pollution Prevention and Management</li> <li>4. Community Health and Safety</li> <li>5. Land Acquisition, Restrictions on Land Use and Involuntary Resettlement</li> <li>6. Biodiversity Conservation and Sustainable Management of Living Natural Resources</li> <li>7. Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities</li> <li>8. Cultural Heritage</li> <li>9. Financial Intermediaries</li> <li>10. Stakeholder Engagement and Information Disclosure</li> </ol>	<ol style="list-style-type: none"> <li>1. Assess &amp; Management of E&amp;S Impacts</li> <li>2. Labor and Working Conditions</li> <li>3. Resource Efficiency and Pollution Prevention and Control</li> <li>4. Health, Safety and Security</li> <li>5. Land Acquisition, , Restrictions on Land Use and Involuntary Resettlement</li> <li>6. Biodiversity Conservation and Sustainable Management of Living Natural Resources</li> <li>7. Indigenous Peoples</li> <li>8. Cultural Heritage</li> <li>9. Financial Intermediaries</li> <li>10. Information Disclosure and Stakeholder Engagement</li> </ol>	<ol style="list-style-type: none"> <li>1. Assess &amp; Management of E&amp;S Risks and Impacts</li> <li>2. Labor and Working Conditions</li> <li>3. Resource Efficiency and Pollution Prevention and Control</li> <li>4. Community Health, Safety and Security</li> <li>5. Land Acquisition and Involuntary Resettlement</li> <li>6. Biodiversity Conservation and Sustainable Management of Living Natural Resources</li> <li>7. Indigenous Peoples</li> <li>8. Cultural Heritage</li> <li>9. Gender Equality</li> <li>10. Stakeholder Engagement and Information Disclosure</li> </ol>



seek to strike a balance between establishing clear requirements without including a level of detailed subrequirements that could inhibit the benchmarking function.

The updated GEF policy is a crisp document, with the nine Minimum Standards occupying only a total of 15 pages (compared to 80 pages for the E&S standards of the IDB's Environmental and Social Policy Framework and over 100 for the World Bank Environmental and Social Framework). Distilling key safeguard principles across a broad range of thematic areas so concisely represents a significant achievement.

Nevertheless, the GEF may wish to consider whether the updated policy covers the full range of relevant safeguard principles and requirements that could contribute not just to environmental and social risk avoidance and mitigation in GEF-financed activities but also to improved outcomes, reinforcing potential key strategic priorities of sustainable recovery and inclusion over the coming years. As noted earlier, a number of Agencies indicated that they would not welcome a change in the policy anytime soon given that they are still in the process of rolling out their updated safeguard frameworks.

Some key areas that could be considered by the GEF and the Council when a review of the Policy on Environmental and Social Safeguards is undertaken include: adopting core/guiding principles (that align with the other policies); framing the policy not only around risk mitigation but also strengthening sustainability; more explicit acknowledgment of human rights; addressing contexts of fragility and conflict; and a range of specific safeguard-related areas, such as adopting an ecosystem approach, addressing risks of illegal trade, biosafety, customary sustainable use, soil management and use of water resources, and other issues ([table 7.1](#)). The following subsections address these issue areas.

## DO NO HARM AND DOING GOOD

In past years, E&S safeguards have typically focused on establishing a set of programming due diligence requirements for identifying potential E&S risks and impacts and adopting measures to avoid, minimize, mitigate, and manage them (“do no harm”). More recently, E&S safeguard frameworks have also emphasized the identification of opportunities at the program/project level to strengthen E&S sustainability of supported activities (“doing good”). Of course, the avoidance/minimization of adverse E&S impacts is a good in itself, but some recent E&S frameworks have also emphasized utilizing the project's E&S risk identification process to also identify opportunities to strengthen sustainability as well as the rights of affected stakeholders. This balance is well articulated in the recently adopted IDB Environmental and Social Policy Framework (IDB 2020; [box 7.1](#)).

The World Bank's Environmental and Social Framework Vision statement speaks of going “beyond ‘do no harm’ to maximizing development gains” (World Bank 2017, 2) and UNDP's updated Social and Environmental Standards include the objective to “maximize social and environmental opportunities and benefits” (UNDP 2021, 3).

The GEF's updated policy focuses primarily on E&S risk identification and mitigation, an issue identified as too narrow in multiple interviews with Agency representatives. Broadening the rationale and lens of the GEF safeguards would allow for strengthened alignment with the other GEF policies (which are not solely framed around risk mitigation) as well as provide more opportunity to demonstrate how the GEF safeguards directly enhance the achievement of key GEF priorities and outcomes.

## HUMAN RIGHTS

The 2017 GEF IEO review noted human rights as an area that was not explicitly addressed in the 2011

**Box 7.1 Balancing environment and social risks: how the IDB describes its commitment**

The IDB is committed to the objective of “do no harm” to people and the environment for the projects it supports by promoting the establishment of clear provisions for effectively managing project-related environmental and social risks and impacts, and whenever feasible, facilitating the enhancement of social and environmental sustainability beyond the mitigation of adverse risks and impacts. The IDB is also committed to maximizing sustainable development benefits, in accordance with the “do good beyond do not harm” principle. The IDB requires its borrowers to not only report on ways in which harms will be avoided, but also consider and report on ways in which project design will enhance both the social and the environmental good. Where the environmental and social assessment of the project has identified such potential opportunities in sustainable development, the Bank will consider with the borrower the feasibility of including these opportunities in the project, or mainstreaming them in IDB country strategies to strengthen the country’s environmental and social governance systems.

**Source:** IDB 2020.

GEF Minimum Standards (save for a general reference to respecting indigenous peoples’ human rights in the criteria of then MS4).

The updated 2018 Policy added a number of provisions directly related to human rights without however mentioning the term (“human rights” does not appear in the policy). This is a lost opportunity to more affirmatively align with the international human rights framework as well as Agenda 2030, and lags behind the practice of a number of GEF Agencies. More explicit attention to human rights may also reinforce the “do good beyond do no

harm” principle that is increasingly a focus in how safeguard frameworks are being framed.

Some of the human rights-related provisions in the updated 2018 GEF Safeguards Policy include the following:

- Ensuring that adverse impacts do not fall disproportionately on “disadvantaged or vulnerable groups,” which are defined broadly and roughly align with prohibited grounds of discrimination outlined in various human rights instruments (the updated policy lists age, gender, ethnicity, religion, physical, mental or other disability, social, civic or health status, sexual orientation, gender identity, economic disadvantages or indigenous status, and/or dependence on unique natural resources);
- Ensuring that disadvantaged or vulnerable groups do not face discrimination, particularly regarding access to development resources and project benefits;
- Addressing the special needs and circumstances of disadvantaged and vulnerable groups;
- Providing opportunities for persons with disabilities to participate in and benefit from programs and projects on an equal basis with others;
- Broadening the need to ensure compliance with not just international “environmental” agreements but also directly relevant provisions of international treaties and agreements as well as applicable national and local laws (which would encompass human rights commitments);
- Targeting provisions against gender-based discrimination;
- Highlighting the need to respond to potential incidences of gender-based violence;
- Underscoring grievance redress and minimizing risks of retaliation against project-affected stakeholders who submit complaints;
- Respecting the free, prior and informed consent of indigenous peoples in certain circumstances;

- Recognizing and protecting the fundamental rights of workers (including freedom of association and collective bargaining, nondiscrimination and equal opportunity in employment, prevention of child labor and forced labor); and
- Strengthening provisions regarding meaningful consultations with stakeholders.

These provisions move the updated GEF safeguards policy closer to key human rights principles such as participation and inclusion, equality and non-discrimination, and accountability and rule of law. However, as noted, the updated GEF safeguards policy does not include an explicit reference to “human rights” (there are references to various types of “rights” in the policy but these may not fully align with human rights obligations).

The lack of any explicit reference to human rights is also noteworthy given that some GEF Agencies include clear commitments in their safeguard frameworks to promote human rights and not to finance projects that may infringe on human rights. A few examples follow:

- **IDB.** The IDB is committed to respecting internationally recognized human rights standards. To that end, in accordance with Environmental and Social Performance Standard (ESPS) 1 of this Policy Framework, the IDB requires its Borrowers to respect human rights, avoid infringement on the human rights of others, and address risks to and impacts on human rights in the projects it supports (IDB 2020).
- **EBRD.** EBRD is committed to the respect for human rights in projects it finances. EBRD will require clients, in their business activities, to respect human rights, avoid infringement on the human rights of others, and address adverse human rights risks and impacts caused by the business activities of clients. EBRD will continuously improve the projects it finances in accordance with good international practice and

will seek to progressively strengthen processes to identify and address human rights risks during the appraisal and monitoring of projects (EBRD 2014).

- **UNDP.** UNDP recognizes the centrality of human rights to sustainable development, poverty alleviation, sustaining peace, and ensuring fair distribution of development opportunities and benefits, and is committed to supporting “universal respect for, and observance of, human rights and fundamental freedoms for all” (UNDP 2021, 6). UNDP refrains from providing support for activities that may contribute to violations of a State’s human rights obligations and the core international human rights treaties, and seeks to support the protection and fulfillment of human rights.

The international human rights framework provides important markers for strengthening environmental and social sustainability. In fact, a central objective of the 2030 Agenda and the Sustainable Development Goals is to “realize the human rights of all.”<sup>6</sup> The GEF may wish to consider strengthening alignment with, and explicit referencing of, human rights in future revisions to the policy.

## FRAGILITY AND CONFLICT

A recent IEO evaluation on GEF support in fragile and conflict-affected situations found that the updated GEF Safeguards Policy does not adequately account for risks of fragility and conflict even though a significant portion of GEF-financed activities take place in conflict or mixed-conflict contexts (GEF IEO 2020).

The evaluation noted that environmental interventions can interact with conflict and fragility in

<sup>6</sup> *Transforming Our World: The 2030 Agenda for Sustainable Development*, [Preamble](#).

three ways: (1) the intervention can be negatively affected by conflict and fragility; (2) the intervention can inadvertently worsen conflict and fragility; and (3) the intervention may help address the drivers, dynamics, and impacts of conflict and build peace (GEF IEO 2020). Concerning some GEF programming areas, the evaluation noted the following:

- Efforts to conserve biodiversity can exacerbate tensions with communities, especially when those communities are excluded from protected areas and when enforcement agents are militarized. Projects may restrict access to land, forests, and other natural resources, generating grievances.
- Climate change interventions can also affect a fragile situation and exacerbate conflict. Both adaptation and mitigation measures may inadvertently lead to disputes over access to benefits (such as revenues) and burdens (such as forests that can no longer be harvested); it may also lead to land grabbing. There is also evidence that climate change may directly amplify the effects of conflict.
- As with other focal areas, land degradation and efforts to address it can be affected by conflict and fragility, and they can affect conflict and fragility. GEF interventions that advance alternative land use schemes have faced challenges in areas where land use is disputed, affecting both project effectiveness and sustainability.

The updated Policy on Environmental and Social Safeguards addresses conflict risks in just one section, on Community Health, Safety and Security (MS9), noting that where relevant the “particular risks that may be present in a conflict or post-conflict context” should be addressed in the project’s E&S assessment (GEF 2018c, MS9, 17.a.iii). The IEO evaluation found that

This safeguard lacks a holistic recognition of the way that conflicts might be linked to the environment and natural resources. It provides no

procedures for identifying, evaluating, or deciding how to manage the risks in a conflict or post-conflict context. It provides no standards regarding management of the conflict-related risks. It is silent on the risks associated with fragility, thus failing to provide any safeguards relevant to fragility in situations that are not “conflict or post-conflict.” (GEF IEO 2020)

The safeguard seems to apply only during the design stage, whereas situations affected by conflict and fragility are dynamic and can change rapidly, and it is necessary for conflict sensitivity to apply throughout the project life cycle.

The IEO evaluation recommended that

the current GEF Environmental and Social Safeguards could be expanded to provide more details so that GEF projects address key conflict-sensitive considerations. At least 11 GEF Agencies have incorporated consideration of conflict and fragility into their respective safeguards... As it has done when updating safeguards regarding gender, the GEF could consider the more detailed provisions incorporated by Agencies as it considers whether and how to expand its safeguards to more effectively address conflict sensitivity.” (GEF IEO 2020, 22; Recommendation 4)

## NO CORE/GUIDING PRINCIPLES

Unlike the GEF Stakeholder Engagement and Gender Equality Policies, the GEF Safeguards Policy does not include a set of overarching guiding principles. Articulating cross-cutting principles could help anchor key objectives (including potentially moving beyond just E&S risk mitigation) as well as improve the rationale, alignment, and harmonization with the other policies. A set of principles could potentially reference respecting human rights obligations and responsibilities of partners; avoiding, mitigating, managing adverse risks and impacts to the environment and people; strengthening identification of environmental and social opportunities and benefits; increasing accountability; ensuring inclusive and meaningful

participation; and promoting gender equality and equal opportunities for women and men.

## OTHER ISSUES FOR CONSIDERATION

When the Council reviews the Policy on Environmental and Social Safeguards, it and the GEF partnership could consider a range of other specific safeguard issues. [Table 7.1](#) at the end of this chapter lists a number of relevant issues and potential gap areas across the Minimum Standards when compared to the findings of the IEO 2017 review as well as recently adopted E&S safeguard frameworks of other institutions (see also [table 7.2](#)).

### 7.5 Buy-in and support for the policy across the partnership

Interviews with Agency representatives indicate strong familiarity with the updated GEF safeguards policy, which is unsurprising given that many Agency representatives were part of the working group that helped to develop the updated policy and also a number were involved in the compliance assessment process for the updated policy (GEF 2019d, 2020b).

In addition to working with the updated policy to ensure compliance, a number of Agency representatives report using the updated GEF policy as a reference to convey key points to teams working on GEF-financed activities as well as sharing the policy with program/project partners (or even using it as leverage to encourage appropriate action by staff or project stakeholders). Some Agencies see no need to reference the updated GEF policy after verifying that their own safeguards frameworks are aligned.

Many Agencies welcomed the updated policy's focus on higher-level safeguard requirements and noted that it is not overly prescriptive, providing

needed flexibility as Agencies elaborate their own frameworks.

Several Agencies noted that the “do no harm” orientation of the updated GEF policy does not fully align with their own objectives to use safeguards to also maximize environmental and social benefits. Some Agencies noted the lack of a guiding framework/rationale for the policy in this regard.

Most Agencies cited good upstream engagement with the GEF Secretariat in addressing safeguard-related requirements in the development of program/project proposals. Some found that the GEF program/project review process often involved multiple inputs (across various issue areas, not just safeguards) from different corners of the Secretariat and that the inputs were at times not fully consistent or standardized.

Aside from basic orientations and the previously noted climate risk screening workshop, most Agency representatives could not recall any specific workshops or trainings on implementation of the updated GEF safeguards policy. Resource constraints at the GEF were acknowledged, however more than one Agency proposed that the GEF could potentially commission qualified entities (e.g., firms, consultants) to offer targeted, deep-dive trainings. The GEF's potential knowledge brokering role was repeatedly cited, with many Agencies noting the deep safeguards expertise across the partnership that the GEF could help leverage. The idea of a GEF safeguards working group was floated.

There was a call by some Agencies for the GEF to play a more proactive role in illuminating the rationale and requirements of the GEF policies (not only safeguards) with country partners. While orientation sessions and the ECWs were noted as helpful platforms for sharing knowledge on the policies, targeted engagement with targeted country actors, ministries, companies, etc., was also noted.

In addition, several Agencies cited some constraints to effective implementation of E&S safeguard requirements in GEF programs/projects, with resource allocation the most cited. Several Agencies (particularly smaller GEF Agencies) noted that the PPG funding levels and timelines are not sufficient for completion of often significant levels of E&S assessment and management planning. This issue is further exacerbated by the lack of safeguards capacity at some Agencies as well as by the challenge of developing programs/projects in difficult environments (including potential conflict areas). Several Agencies expressed interest in the sharing of a roster of expert consultants to help facilitate addressing challenging safeguard issues.

The survey of OFPs for this evaluation found that around 45 percent of OFPs indicated they use the updated GEF safeguards policy occasionally but were not fully familiar with the policy requirements. Less than 20 percent of OFP respondents indicated that they were very familiar with the updated GEF policy and a similar proportion said they are not at all familiar with the policy.

Over 70 percent of OFP respondents found the updated GEF safeguards policy to be “mostly applicable” (nearly 20 percent questioned their applicability in some settings) and over 60 percent found the updated policy and accompanying guidelines to be “totally or mostly clear.” OFPs made a number of suggestions to improve the policy, guidelines, and support, including more communication about the existence of the documents, e-learning materials and infographics, simplified language in the policy documents and translation to local languages, a requirement for an environmental and social audit at the end of programs and projects, more technical training on safeguard topics (with regular refresher webinars), and consultations at the regional level on the policy.

## 7.6 Policy compliance

The GEF Policy on Environmental and Social Safeguards became effective on July 1, 2019, for all newly submitted GEF projects and programs. For programs/projects under implementation, the reporting requirements of the updated policy apply to all midterm reviews and terminal evaluations submitted after July 1, 2020.

For the portfolio review for this evaluation, the recent applicability of the updated policy limited the cohort of programs/projects subject to the new policy to only 14. The paucity of available data also limited the testable compliance variables for the policy to just two: screening and categorization of potential E&S risks and impacts, and projects reporting on safeguards during implementation.

All 14 projects for which the requirement was mandatory were designated a safeguards risk category, with low/category C and moderate/category B descriptors of risks the most commonly assigned (32 percent each) to programs/projects.<sup>7</sup> The portfolio review could not discern relevant trends for this variable across focal areas, Agencies, or regions.

In analyzing earlier cohorts (back to 2014) of GEF programs/projects for this evaluation, the portfolio review found that Agencies had already been providing safeguards risk categorization information with program/project proposals despite the lack of a mandatory requirement (76 percent of projects from cohort 1 and 85 percent of those from cohort 2; see [table 4.4](#) for a description of the cohorts).

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<sup>7</sup> The GEF Secretariat indicates that for the June 2020 Work Program (128 PIFs/PFDs), the initial risk categorization showed that 11 percent of projects were rated high/substantial Risk, 54 percent were rated moderate Risk, and 28 percent were rated low risk (GEF 2020b).

In terms of reporting on the implementation of relevant environmental and social management measures during project implementation, no mid-term reviews were yet available for the projects subject to updated policy. 2 of the 14 projects had a PIR available (one of which included safeguards information). As noted earlier, the updated GEF policy does not require reporting on implementation of safeguard measures in annual PIRs (only at midterm and completion). This reporting gap is all the more curious given that, similar to the above point on categorization, Agencies have already largely been including some safeguards information in their PIRs (77 percent for cohort 1, 78 percent for cohort 2). The updated GEF policy appears to have missed an opportunity to codify established practice and help standardize annual reporting on safeguards implementation.

## 7.7 Monitoring and reporting

As noted in the above section on responding to the GEF IEO 2017 safeguards review (Recommendation 2; see [page 88](#)), the updated GEF policy strengthened safeguards monitoring and reporting requirements. The GEF Secretariat issued a report to the Council that addresses the requirements for portfolio-level reporting on the level and types of E&S risks identified in GEF programs/projects as well as summaries of GEF project-related cases submitted to Agency accountability/conflict resolution mechanisms. At this stage of early policy implementation, only one report for each of these issues have been submitted to date and it is not possible to evaluate relevant trends.

## 7.8 Summary

- The GEF has responded to IEO's recommendations from the 2017 safeguards review by updating the GEF safeguards policy,

incorporating most of the main gap areas identified in the review. The updated policy has again served as a catalyst for strengthening the safeguard frameworks of a number of GEF Agencies. However, some safeguard issues could be further strengthened in the future.

- The updated GEF safeguards policy improved safeguards reporting and monitoring in line with the 2017 IEO recommendations, requiring Agencies to provide information at project midterm and project completion. However, unlike the Policy on Gender Equality and the Policy on Stakeholder Engagement, the safeguards policy does not require safeguards reporting in PIRs, a curious misalignment and missed opportunity to codify and standardize established practice as Agencies, to a large extent, have already been including some safeguards information in PIRs. The updated policy also increased portfolio-level reporting on safeguard risks and grievance cases, again in line with the 2017 IEO recommendations.
- The GEF has not moved forward on the IEO recommendation to support capacity development, expert convening, and communications on safeguards in the GEF Partnership. The updated policy did not include a requirement for knowledge sharing on safeguards (as noted in [section 7.2](#)). The Secretariat has included information sessions on the updated policy in ECWs and other venues. A recent Secretariat progress report signals potential movement in this area. Input from GEF Agencies and OFPs indicated significant interest in the GEF expanding its knowledge brokering role on challenging safeguard-related issues.
- The updated safeguards policy incorporated a range of "new" thematic areas, such as labor and working conditions; community health, safety, and security; climate change and disaster risks; disability inclusion; disadvantaged or vulnerable individuals or groups; and adverse gender-related impacts, including

gender-based violence and sexual exploitation and abuse. Nevertheless, some identified gap areas from the 2017 review were not or were only partially included in the updated policy. In addition, further reviews and recently updated Agency safeguard frameworks highlight potential areas where the GEF safeguards could eventually be further strengthened. However, it is important to note that some Agency interviewees indicated no desire for a change in policies anytime soon given that they are still in the process of rolling out their updated safeguard frameworks. These areas include a broader framing beyond “do no harm” and explicit alignment with human rights frameworks, fragility and conflict issues, and a range of other specific issues areas (e.g., ecosystem approach, illegal trade, biosafety, among others noted below).

- The highlighting of safeguard-related risks and impacts across the portfolio, as well as heightened attention to grievance cases, may help drive greater attention to safeguard issues during project implementation. However, as the updated GEF policy went into effect only in July 2019, relatively few projects (14) were subject to the new requirements and the portfolio analysis was unable to determine any relevant compliance trends given the limited data.



**Table 7.1** Safeguard issue areas for further consideration

GEF 2018 Environmental and Social Safeguards Policy Minimum Standard	Area
MS1: Environmental and Social Assessment, Management and Monitoring	<ul style="list-style-type: none"> <li>● <b>Climate change and disaster risks.</b> Risk identification could be more specific, including a wider range of disaster risks (not just natural hazards) in line with the Sendai Framework, and identifying exposure and vulnerability to climate change impacts, in particular for disadvantaged and vulnerable groups and individuals.</li> <li>● <b>Contractors and primary suppliers.</b> Appropriate due diligence regarding reputation, performance and potential environmental and social risks and impacts associated with program/project contractors and primary suppliers.</li> <li>● <b>Monitoring.</b> Immediately address and promptly notify stakeholders regarding incidences or accidents that may have significant adverse impacts.</li> </ul>
MS2: Accountability, Grievance and Conflict Resolution	<ul style="list-style-type: none"> <li>● <b>Risk of retaliation.</b> Broaden requirement to take measures to minimize risk of retaliation against not just “complainants” but also stakeholders who seek information on or participation in GEF-financed activities.</li> </ul>
MS3: Biodiversity Conservation and the Sustainable Management of Living Natural Resources	<ul style="list-style-type: none"> <li>● <b>Geographic scale of risk identification.</b> Potential risks and impacts associated with program/project activities should be considered across potential landscapes and seascapes, as relevant.</li> <li>● <b>Ecosystem approach.</b> Reference could be made to the need to apply where relevant and ecosystem approach for the integrated and adaptive management of terrestrial, freshwater, marine and living resources that promotes conservation and sustainable use in an equitable way, in line with CBD guidance.</li> <li>● <b>Illegal trade.</b> Ensure activities do not increase the risk of illegal trade in protected species, in line with the Convention on the International Trade in Endangered Species (CITES), etc.</li> <li>● <b>Soil management.</b> Given widespread erosion and loss of soils, emphasize the need to avoid and minimize adverse impacts on soils, their biodiversity, organic content, productivity, structure, water-retention capacity.</li> <li>● <b>Water resources.</b> Further emphasis could be placed on the need to seek to avoid adverse impacts on water resources and water related ecosystems and to ensure sustainable use of water resources.</li> <li>● <b>Biosafety.</b> Ensure appropriate risk assessments are undertaken in the transfer, handling and use of genetically modified organisms/living modified organisms that result from modern biotechnology and that may have an adverse impact on biodiversity, in line with national regulations and the CBD Cartagena Protocol.</li> <li>● <b>Customary sustainable use of biodiversity.</b> In line with the CBD, where relevant protect and encourage customary use of biological resources in accordance with traditional knowledge, innovations and cultural practices that are compatible with conservation or sustainable use requirements, ensuring full, effective participation of relevant indigenous peoples/local communities where such knowledge/practices are affected, supported, or used.</li> <li>● <b>Animal welfare, antimicrobial resistance.</b> Provisions regarding sustainable management of living natural resources could be broadened to include where relevant adoption of appropriate measures to promote animal welfare, control for potential invasiveness or escape of production species, and minimization of antimicrobial resistance.</li> </ul>

*(continued)*

**Table 7.1** Safeguard issue areas for further consideration *(continued)*

GEF 2018 Environmental and Social Safeguards Policy Minimum Standard	Area
MS4: Restrictions on Land Use and Involuntary Resettlement	<ul style="list-style-type: none"> <li>● <b>Gender aspects.</b> Consider emphasizing the need to factor in women’s perspectives into all aspects of planning and implementation of displacement activities, recognizing women and men as co-beneficiaries for compensation, and providing single women with their own compensation.</li> <li>● <b>Compensation for persons without formal legal rights to land or recognizable claims.</b> Persons who are economically displaced and are without legally recognizable claims to land should be compensated (not just provided assistance) for any lost assets other than land (e.g., crops, irrigation infrastructure, other improvements made to the land).</li> <li>● <b>Restricted access to protected areas.</b> Where supported activities restrict access to resources in legally designated parks or protected areas or other common property resources, establish a collaborative process with affected persons and communities to negotiate and determine appropriate restrictions and mitigation measures to improve affected livelihoods while maintaining the sustainability of the park or protected area (e.g., a Process Framework).</li> <li>● <b>Improving livelihoods as an objective.</b> Place further emphasis on seeking to improve affected livelihoods and living standards given the potential significant adverse impact on livelihoods and social cohesion caused by displacement.</li> <li>● <b>Monitoring and completion analysis.</b> Ensure independent monitoring by qualified experts of implementation of displacement action plans, and undertake completion analysis as to whether the objective of improving or at least restoring livelihoods and living standards was achieved, proposing corrective actions where necessary.</li> </ul>
MS5: Indigenous peoples	<ul style="list-style-type: none"> <li>● <b>FPIC.</b> Consider broader application of FPIC beyond the three specified circumstances. This could include carrying out engagement processes with objective of obtaining Indigenous peoples’ FPIC regarding activities that may affect indigenous peoples’ rights, lands, territories, natural resources, livelihoods, cultural heritage, including activities proposing the development, use, or exploitation of mineral, forest, water, or other resources. In addition, recognize that where agreement or consent cannot be ascertained, adjustments of the relevant activities are to be made, including in all likelihood a decision to exclude the activities for which agreement or consent cannot be ascertained.</li> <li>● <b>Cultural heritage.</b> If indigenous peoples affected by supported activities hold the location, characteristics or traditional use of cultural heritage in secret, put in place measures to maintain confidentiality.</li> <li>● <b>Monitoring.</b> Involve knowledgeable experts and ensure that Indigenous peoples affected by supported activities will jointly monitor implementation of action plans.</li> </ul>
MS6: Cultural Heritage	<ul style="list-style-type: none"> <li>● <b>Utilization of cultural heritage.</b> To better safeguard the appropriation of cultural heritage, broaden requirement on commercial use of cultural heritage to include not just commercial use but “utilization” of cultural heritage (e.g., for research purposes, etc.) and require good faith negotiations and documented outcomes that provide for fair and equitable benefit sharing with relevant communities whose cultural heritage is affected.</li> </ul>

*(continued)*

**Table 7.1** Safeguard issue areas for further consideration *(continued)*

GEF 2018 Environmental and Social Safeguards Policy Minimum Standard	Area
MS7: Resource Efficiency and Pollution Prevention	<ul style="list-style-type: none"> <li>● <b>Waste management.</b> Requirements regarding managing wastes could be strengthened by ensuring that reputable contractors are utilized, licensed disposal sites are being operated to acceptable standards (shifting away from such sites where this is not the case) and obtaining chain-of-custody documentation for third-party disposal and ensuring adherence to laws governing transboundary movement of wastes.</li> </ul>
MS8: Labor and Working Conditions	<ul style="list-style-type: none"> <li>● <b>Safe facilities and accommodations.</b> Program/project workers should be provided with safe and healthy facilities appropriate to the circumstances of their work, including access to canteens, hygiene facilities, and appropriate areas for rest. Where accommodation services are provided, these should be provided in a manner that ensures the quality of accommodation in order to protect and promote the health, safety, and well-being of the workers and to provide access to services that accommodate their physical, social, and cultural needs.</li> <li>● <b>Contractors/third parties.</b> Conduct due diligence to ascertain that third parties who engage program/project workers are legitimate and reliable entities and have in place human resources management policies and processes and applicable occupational safety and health management systems that allow them to operate in accordance with the requirements of MS8.</li> <li>● <b>Supply chain risks.</b> Identify potential risks of violations of supplier workers' fundamental rights and safety and health issues which may arise in relation to primary suppliers (at a minimum), requiring the primary supplier to identify and address those risks. If child labor, forced labor, or breaches of other fundamental rights identified, require primary suppliers to take appropriate steps to remedy them. Where prevention and remedy of such risks are not possible, shift the program/project's primary suppliers to suppliers that can demonstrate that they are meeting the relevant requirements of MS8.</li> </ul>
MS9: Community Health, Safety and Security	<ul style="list-style-type: none"> <li>● <b>Risks to communities.</b> Risk identification could be broadened beyond accidents and natural hazards to include all types of hazards (e.g., human-made, including pollution risks).</li> <li>● <b>Risks associated with influx of project workers.</b> Ensure appropriate measures are taken to avoid, mitigate, and manage the risks and potential adverse impacts on health and safety arising from the influx of workers into programming areas.</li> <li>● <b>Scope of risks of structural elements.</b> Current provision (17c) stipulates qualifications and criteria for the design and construction of structural elements, but limits application to those elements "situated in high-risk locations." This is too narrow. The criteria should be applied to structural elements that pose significant health and safety risks. In addition, construction of structural elements should take into account climate change and disaster risk considerations as appropriate.</li> <li>● <b>Risks posed by security arrangements.</b> Current provision (17f) could be strengthened and made more specific by ensuring that potential risks posed by program/project-related security arrangements are assessed, personnel are appropriately vetted and trained, and that security arrangements are monitored and reported, including requiring appropriate measures be adopted that seek to prevent any abuses and/or reprisals against individuals and communities. Where necessary, unlawful and abusive acts should be reported to relevant authorities.</li> </ul>

**Table 7.2 Coverage gaps and points of emphasis identified in 2017 IEO review**

GEF 2011 Policy on Agency Minimum Standards on Environmental and Social Safeguards	GEF 2018 Policy on Environmental and Social Safeguards
<b>MS1. Environmental and Social Impact Assessment</b>	Title could reflect broader focus on management of environmental and social risks and impacts in addition to assessment
Overarching criteria/objectives	<p><b>Addressed.</b> Scope/title of MS1 broadened to include both “Management” and “Monitoring”</p> <p><b>Addressed</b></p> <ul style="list-style-type: none"> <li>● Mitigation hierarchy emphasized</li> <li>● Focus included on identifying, assessing, and managing full range of risk types</li> </ul>
Risk identification/scope of assessment	<ul style="list-style-type: none"> <li>● Emphasis on impact avoidance and application of mitigation hierarchy (addressed in a minimum requirement 1.5 but could be heightened objective)</li> <li>● Focus on identifying, assessing, and managing environmental and social risks and impacts, not just undertaking of environmental and social impact assessments (ESIAs), to promote environmental and social sustainability</li> </ul> <p><b>Addressed.</b> Scope/title of MS1 broadened to include both “Management” and “Monitoring”</p> <ul style="list-style-type: none"> <li>● Requirements re screening covers risks regarding all safeguard policy areas</li> <li>● Requirements on climate and disaster risks included</li> <li>● Requirements added on disadvantaged and vulnerable, disability inclusion, and adverse gender impacts and sexual exploitation and abuse</li> <li>● Associated facilities covered</li> </ul>
Supply chains	<p>Provision to address environmental and social risks/impacts associated with primary supply chains where entity can reasonably exercise control or influence</p> <p><b>Partially addressed</b></p> <ul style="list-style-type: none"> <li>● MS3 Biodiversity includes sustainable procurement requirements</li> <li>● However, other risk areas (such as use of forced labor or child labor) in supply chains not addressed</li> </ul>
Applicable legal framework	<ul style="list-style-type: none"> <li>● Broader reference to adherence to obligations under international treaties and agreements (not just international environmental agreements)</li> <li>● Reference to applying leading standards, where relevant, for managing risks/impacts, such as Good International Industry Practice (GIIP), including World Bank Environmental, Health, Safety Guidelines (EHSB)</li> </ul> <p><b>Addressed</b></p> <ul style="list-style-type: none"> <li>● Risk consideration to include consideration of all directly relevant provisions of international treaties/agreements</li> <li>● Applying GIIP referenced regarding pollution prevention and hazardous wastes in MS7</li> </ul>
Emergency preparedness	<p>Focus on addressing preparedness and response for potential emergencies or accidents associated with project activities</p> <p><b>Addressed.</b> Emergency preparedness addressed in MS9 re community safety</p>
Monitoring and reporting	<ul style="list-style-type: none"> <li>● Emphasis on need to monitor effectiveness of management program and compliance with legal/contractual obligations and regulatory requirements and implementing corrective actions</li> <li>● Requirement that monitoring reports address status of implementation of environmental and social management plans</li> <li>● Emphasis on involving project-affected groups in project monitoring program, where appropriate</li> </ul> <p><b>Addressed</b></p> <ul style="list-style-type: none"> <li>● Agencies required to monitor implementation of environmental/social management measures at midterm and completion</li> <li>● Stakeholder engagement required throughout project life cycle, including monitoring</li> </ul>
<b>MS 2. Protection of Natural Habitats</b>	<p>Title could reflect broader focus on biodiversity conservation and sustainable natural resource management, including sustainable forestry, agriculture, animal husbandry, fisheries</p> <p><b>Addressed.</b> Broadened to MS3 “Biodiversity Conservation and Sustainable Management of Living Natural Resources”</p>

*(continued)*

**Table 7.2 Coverage gaps and points of emphasis identified in 2017 IEO review** *(continued)*

GEF 2011 Policy on Agency Minimum Standards on Environmental and Social Safeguards	GEF 2018 Policy on Environmental and Social Safeguards	
Overarching criteria/objectives	<ul style="list-style-type: none"> <li>● Inclusion of sustainable production and harvesting of natural resources</li> <li>● Fair and equitable sharing of benefits from the use of genetic resources</li> </ul>	<b>Addressed.</b> Both points included
Risk identification/scope of assessment	<ul style="list-style-type: none"> <li>● Emphasis on need to identify relevant threats to biodiversity, for example, habitat loss, degradation and fragmentation; invasive alien species; overexploitation; hydrological changes; nutrient loading; pollution and incidental take, as well as projected climate change impacts</li> <li>● Include need to take into account differing values attached to biodiversity and ecosystem services by affected communities, and where appropriate, other stakeholders</li> </ul>	<b>Addressed.</b> Both points included
Impacts on natural habitats	Mitigation measures designed to achieve no net loss of biodiversity, where feasible	<b>Addressed.</b> Requires measures that seek to achieve no net loss and preferably a net gain in associated biodiversity values
Impacts on critical habitats	<ul style="list-style-type: none"> <li>● Broader definition of critical natural habitats that includes areas of significant importance to endangered endemic and/or restricted-range species; concentrations of migratory or congregatory species; highly threatened and/or unique ecosystems.</li> <li>● “No significant conversion or degradation” standard for critical natural habitats may be modified to include the need to ensure no adverse impacts on critical habitats unless can demonstrate no viable alternatives for projects in habitats of lesser biodiversity value; no net reduction in biodiversity values for which critical habitat designated; no net reduction in endangered species or restricted-range species; mitigation measures reflected in robust management plan designed to achieve net gains in biodiversity</li> <li>● Note: current GEF Principle (not part of Agency Minimum Standards) of not supporting projects that “degrade or convert critical natural habitats” applies a more stringent financing standard</li> </ul>	<p><b>Addressed</b></p> <ul style="list-style-type: none"> <li>● Definition of critical habitats updated</li> <li>● Standard for impacts on critical habitats updated whereby Agencies shall not propose projects that “involve adverse impacts” on such areas</li> </ul>
Use of biodiversity offsets	Establish conditions on use of biodiversity offsets, including consideration only as last resort if significant residual adverse impacts remain after avoidance, minimization, and restoration measures applied; designed to achieve measurable conservation outcomes expected to result in no net loss and preferably a net gain of biodiversity (with net gain required in critical habitats); adhere to the “like-for-like or better” principle; carried out with best available information, current practices, and expertise; and not allowed in unique, irreplaceable areas.	<b>Addressed.</b> Criteria for use of biodiversity offsets as last resort included
Alien and invasive species	<ul style="list-style-type: none"> <li>● Not addressed in Agency Minimum Standards (although GEF Principle notes that it will not finance introduction or use of potentially invasive, non-indigenous species)</li> <li>● Include minimum requirements regarding no deliberate introduction of any alien species with high risk of invasive behavior; no intentional introduction of new alien species unless done in accordance with existing regulatory framework; all introductions of alien species subject to risk assessment; implement measures to avoid accidental or unintended introductions; exercise due diligence not to spread established alien species to new areas.</li> </ul>	<b>Addressed.</b> Introduction/use of invasive alien species (IAS) not allowed, and risks regarding IAS to be assessed

*(continued)*

**Table 7.2 Coverage gaps and points of emphasis identified in 2017 IEO review** *(continued)*

GEF 2011 Policy on Agency Minimum Standards on Environmental and Social Safeguards		GEF 2018 Policy on Environmental and Social Safeguards
Biosafety	Ensure risk assessments undertaken in accordance with international protocols on the transfer, handling, and use of genetically modified organisms/living modified organisms, consistent with CBD and Cartagena Protocol	<b>Partially addressed.</b> Specific biosafety provisions re Cartagena Protocol not included; requirement on adherence to applicable international environmental treaties/agreements covers issue (if flagged)
Utilization of genetic resources	Ensure collection of genetic resources is conducted sustainably, that benefits derived from their utilization are shared in a fair and equitable manner, consistent with CBD and Nagoya Protocol	<b>Addressed.</b> Included
Sustainable management of living natural resources	<ul style="list-style-type: none"> <li>● Broaden requirements for sustainable management beyond forestry to include production and harvesting of living natural resources, including agriculture, animal husbandry, fisheries</li> <li>● Include minimum requirements regarding application of good sustainable management practices to all living natural resource production and harvesting; where codified, application of credible industry-specific standards for sustainable management (often demonstrated through independent verification and certification) for large-scale operations; require small-scale producers to operate in sustainable manner with focus on continual improvement</li> <li>● Apply siting preference to sustainable production and harvesting projects (on already converted or unforested lands, where feasible)</li> </ul>	<b>Partially addressed</b> <ul style="list-style-type: none"> <li>● Scope of sustainable management provisions broadened to all living natural resource production/harvesting</li> <li>● Application of GIIP and industry-specific standards required</li> <li>● Siting preference not specifically noted</li> </ul>
Supply chains	Avoid project-related purchasing of natural resource commodities that may contribute to significant conversion or degradation of natural or critical habitats. Where such potential risks exist, systems and verification practices should demonstrate origin of supply and limit procurement to suppliers who can demonstrate they are not contributing to significant conversion of natural/crucial habitats	<b>Addressed.</b> Included
<b>MS 3. Involuntary Resettlement</b>	Title could further reflect GEF's focus on potential impacts caused by restrictions on land use	<b>Addressed.</b> Scope/title broadened to MS4 "Restrictions on Land Use and Involuntary Resettlement"
Scope of application	<ul style="list-style-type: none"> <li>● Standard applies to temporary and permanent economic and physical displacement</li> <li>● Scope could be further clarified by providing definition of involuntary resettlement, such as: resettlement (physical and economic) is considered involuntary when affected persons do not have the right to refuse land acquisition or access restrictions that result in physical or economic displacement. This occurs in cases of lawful expropriation or temporary/permanent land use restrictions, and negotiated settlements in which buyer can resort to lawful expropriation or impose legal restrictions on land use if negotiations fail</li> <li>● Scope of involuntary restriction of access provision typically extends beyond just "legally designated parks and protected areas" to restrictions on access to land or use of other resources including communal property, areas subject to customary usage, and natural resources such as marine and aquatic resources, timber, nontimber forest products, freshwater, medicinal plants, hunting and gathering grounds, and grazing and cropping areas</li> <li>● Exclusions of scope of application may include voluntary land transactions; voluntary, consensual restrictions of access to natural resources under community-based natural resource management projects</li> </ul>	<b>Addressed</b> <ul style="list-style-type: none"> <li>● Scope and definition of involuntary resettlement broadened</li> <li>● Scope broadened re access restrictions (definitions added on economic displacement and restrictions on land use)</li> </ul>
Forced evictions	Avoid forced evictions	<b>Addressed.</b> Forced evictions prohibited

*(continued)*

**Table 7.2 Coverage gaps and points of emphasis identified in 2017 IEO review** *(continued)*

GEF 2011 Policy on Agency Minimum Standards on Environmental and Social Safeguards		GEF 2018 Policy on Environmental and Social Safeguards
<b>MS 4. Indigenous peoples</b>		MS5 Indigenous peoples
Identification of indigenous peoples	Specified criteria to aid in identifying presence of indigenous peoples could include not just “collective attachment to land” but collective attachment to geographically distinct areas and natural resources. Criteria that indigenous peoples engaged “primarily in subsistence-oriented production” may be too limiting	<b>Addressed.</b> Criteria for identification of indigenous peoples updated in definitions
Meaningful participation	Heightened participation requirements for projects affecting Indigenous peoples widely recognized and partly reflected in Minimum Standard, such as need for “full and effective participation.” However current GEF term calling for “free, prior informed consultation” may generate confusion with more recognized term of free, prior, and informed consent (see below). Clarify that meaningful consultation and participation required for all projects, and additional levels of agreement and consent required for projects that may adversely impact the rights of indigenous peoples (see below). Meaningful consultation and participation includes involvement of indigenous peoples’ representative bodies and organizations, provide sufficient time for decision making processes of relevant indigenous groups, and allows effective participation in design of project activities or mitigation measures that could affect them	<b>Addressed.</b> Meaningful consultation provisions broadened/updated
Circumstances for free, prior, and informed consent (FPIC)	<ul style="list-style-type: none"> <li>● Currently limited. Section V., para. 6 of GEF Agency Minimum Standards adopts a standard of FPIC for projects in countries that have ratified ILO Convention 169. In addition, Minimum Requirement 4.7 requires prior agreement for utilization of cultural resources or knowledge of indigenous peoples.</li> <li>● Some Agencies require FPIC for all projects affecting indigenous peoples, or where projects may affect their rights, lands, territories, resources, and traditional livelihoods. Some Agencies specify the circumstances for required adherence to FPIC, such as projects that may cause: <ul style="list-style-type: none"> <li>● Adverse impacts on lands and natural resources subject to traditional ownership or under customary use or occupation</li> <li>● Relocation of indigenous peoples from land and natural resources subject to traditional ownership or under customary use or occupation</li> <li>● Significant impacts on important cultural heritage and use of indigenous people’s cultural heritage including knowledge, innovations, and practices</li> <li>● FPIC builds on meaningful consultation and participation, pursued through good faith negotiations. FPIC process to document mutually accepted process to carry out good faith negotiations, and outcome of good faith negotiations, including all agreements reached as well as dissenting views, noting that FPIC does not require unanimity</li> </ul> </li> </ul>	<p><b>Addressed</b></p> <ul style="list-style-type: none"> <li>● New MS5 requires FPIC in three circumstances: impacts on lands and resources, including restricted access, relocation, and significant impacts on/use of cultural heritage. This scope of FPIC circumstances is narrower than that applied by some GEF Agencies, but aligns with others</li> <li>● Definition of FPIC reflects some common criteria, and notes requirement for good faith negotiations and documented processes/outcomes</li> </ul>
Voluntary isolation	Where project may affect uncontacted or voluntarily isolated indigenous peoples, take appropriate measures to recognize, respect, and protect their lands and territories, environment, health, and culture as well as measures to avoid all undesired contact	<b>Addressed.</b> Included
<b>MS 5. Pest Management</b>	Broader title to reflect expanded scope on pollution prevention and resource efficiency	New MS7 “Resource Efficiency and Pollution Prevention” broadens scope and includes pest management

*(continued)*

**Table 7.2 Coverage gaps and points of emphasis identified in 2017 IEO review** *(continued)*

GEF 2011 Policy on Agency Minimum Standards on Environmental and Social Safeguards		GEF 2018 Policy on Environmental and Social Safeguards
Objectives/scope	<ul style="list-style-type: none"> <li>● Broaden scope and objectives to encompass pollution prevention (including climate pollutants, wastes, pesticides and hazardous materials) and resource efficiency</li> <li>● Additional objectives include promoting sustainable use of resources; avoiding adverse impacts to human health and the environment by avoiding/minimizing project-related pollution, generation of wastes and hazardous materials; avoiding and minimizing project-related emissions of climate pollutants</li> </ul>	<b>Addressed.</b> Scope broadened, includes climate pollutants, wastes, hazardous materials, and resource efficiency
Pollution prevention	<ul style="list-style-type: none"> <li>● Avoid release of pollutants, and if not feasible, minimize and control intensity, concentration, and mass flow of their release, including routine, nonroutine, and accidental releases</li> <li>● Apply control measures and performance levels specified in national law and GIIP</li> <li>● Adopt alternatives and/or feasible options to avoid or minimize project-related emissions and estimate greenhouse gas emissions where potentially significant</li> </ul>	<b>Addressed.</b> All points included
Wastes	<ul style="list-style-type: none"> <li>● Avoid generation of hazardous/nonhazardous wastes. Where avoidance not possible, minimize waste generation, and reuse/recycle/recover waste in safe manner. Ensure waste treatment/disposal performed in environmentally sound and safe manner</li> <li>● For hazardous waste, ensure compliance with national requirements and applicable international conventions, including on transboundary movement, and where such wastes managed by third parties, use contractors that are reputable and legitimate licensed by relevant regulatory agencies and obtain chain of custody documentation to final destination</li> </ul>	<b>Partially addressed.</b> Most points addressed. Specific requirements re hazardous waste (transboundary movement restrictions, reputable contractors, chain of custody) not specifically included, but covered more generally through reference to international treaties/agreements and application of GIIP
Hazardous materials and chemicals	<ul style="list-style-type: none"> <li>● Broaden coverage of current Minimum Standard that addresses hazardous pesticides and procurement of persistent organic pollutants (5.3)</li> <li>● Avoid, or where avoidance is not possible, minimize and control the release and use of hazardous materials. Assess production, transportation, handling, storage, and use of hazardous materials, and consider less hazardous substitutes</li> <li>● Avoid the trade in or use of chemicals and hazardous materials subject to international bans or phaseouts due to high toxicity to living organisms, environmental persistence, potential for bio-accumulation, or potential depletion of ozone layer, consistent with international conventions or protocols</li> </ul>	<b>Addressed.</b> All points addressed
Pesticides	Additional provision that pesticide application regime to (1) avoid, or where not possible, minimize damage to natural enemies of target pest, and (2) avoid, or where not possible, minimize risks associated with development of resistance in pests and vectors	<b>Addressed.</b> Points addressed
Resource efficiency	<ul style="list-style-type: none"> <li>● Implement technically and financially feasible and cost-effective measures for improving efficiency in consumption of energy, water, other resources, and material inputs</li> <li>● If the project is a significant consumer of water, in addition to resource efficiency measures, adopt measures that avoid or reduce water usage so that it does not have significant adverse impacts on communities, other users, and the environment</li> </ul>	<b>Addressed.</b> Points addressed
<b>MS 6. Physical Cultural Resources</b>	Title could reflect broader scope covering all forms of cultural heritage	Retitled MS6 "Cultural Heritage"

*(continued)*



**Table 7.2 Coverage gaps and points of emphasis identified in 2017 IEO review** *(continued)*

GEF 2011 Policy on Agency Minimum Standards on Environmental and Social Safeguards		GEF 2018 Policy on Environmental and Social Safeguards
Objectives/scope	<ul style="list-style-type: none"> <li>● Broaden scope beyond “physical” cultural heritage to include both tangible and intangible cultural heritage. Definitions include:</li> <li>● Tangible cultural heritage includes movable or immovable objects, sites, structures, groups of structures, and natural features and landscapes that have archaeological, paleontological, historical, architectural, religious, aesthetic, or other cultural significance. May be located in urban or rural settings; may be above or below ground</li> <li>● Intangible cultural heritage includes practices, representations, expressions, knowledge, skills—as well as the instruments, objects, artifacts and cultural spaces associated therewith—that communities/groups recognize as part of their cultural heritage, as transmitted from generation to generation and constantly recreated by them in response to their environment, their interaction with nature, and their history</li> <li>● Objectives to include equitable sharing of benefits from use of cultural heritage</li> </ul>	<b>Addressed.</b> Scope broadened to include intangible cultural heritage (see definitions)
Stakeholder access	Where project may restrict access to previously accessible cultural heritage sites, allow continued access to cultural site, based on consultations; provide alternative routes if access blocked, subject to overriding safety and security considerations	<b>Addressed.</b> Also includes requirement for confidentiality of cultural heritage where disclosure may jeopardize safety or integrity
Equitable benefits sharing for use of cultural heritage	Where project proposes use of cultural heritage, including knowledge, innovations, or practices of local communities for commercial purposes, inform communities of rights under national law, scope and nature of proposed commercial development, and potential consequences of such development. Do not proceed with project unless good faith negotiations with project-affected parties result in a documented outcome and provides for fair and equitable sharing of benefits from commercialization of such knowledge, innovation, practice, consistent with customs and traditions of project-affected parties	<b>Partially addressed.</b> Requires informing affected parties of rights and arrangements for equitable sharing of benefits from commercial use, however MS6 is less specific regarding not proceeding unless good faith negotiations and documented outcomes demonstrated
<b>MS 7. Safety of Dams</b>	Revise title to reflect broader scope of Community Health and Safety	Broadened coverage to MS9 “Community Health, Safety, and Security”
Objectives/scope	<ul style="list-style-type: none"> <li>● Current Minimum Standard limited to dam safety issues. With GEF Principle of not financing large or complex dams, there is less need for dedicated dam safety standard</li> <li>● While MS1 generally encompasses infrastructure safety issues, including risks to human health and safety, more specific requirements can be used</li> <li>● Scope to cover infrastructure safety, impacts on ecosystem services, management of hazardous materials, emergency preparedness, community exposure to disease, and security personnel</li> </ul>	<b>Addressed</b> <ul style="list-style-type: none"> <li>● Scope broadened to cover range of risks to community health and safety</li> <li>● Includes risks present in conflict and post-conflict contexts</li> <li>● Includes addressing special needs and exposure of disadvantaged and vulnerable, particularly women and children</li> </ul>
General risk/impact identification and management	Evaluate risks/impacts on health and safety of affected community during project life cycle and establish preventive and control measures consistent with GIIP (such as EHS). Identify risks/impacts and propose mitigation measures commensurate with their nature and magnitude	<b>Addressed.</b> Addressed (though less specific re application of GIIP, EHS)

*(continued)*

**Table 7.2 Coverage gaps and points of emphasis identified in 2017 IEO review** *(continued)*

GEF 2011 Policy on Agency Minimum Standards on Environmental and Social Safeguards	GEF 2018 Policy on Environmental and Social Safeguards
<p>Infrastructure safety</p> <ul style="list-style-type: none"> <li>● Design, construct, operate, decommission structural elements in accordance with national regulations and GIPP, considering safety risks to third parties and communities</li> <li>● Structural elements will be designed and constructed by competent professionals, and certified and approved by competent authorities or professionals</li> <li>● Take into consideration potential risks associated with climate change and incremental risks of public's potential exposure to operational accidents or natural hazards</li> <li>● If operate moving equipment on public roads and other forms of infrastructure, seek to avoid occurrence of incidents and injuries to public</li> </ul>	<p><b>Partially addressed</b></p> <ul style="list-style-type: none"> <li>● MS9 requires application of requirements to structural elements when situated in high-risk locations, not more generally. While it requires use of external experts to review design, construction, etc., it is less specific regarding use of certified professionals. This may partly reflect the fact that infrastructure is not a focus on GEF financed-activities</li> <li>● Specific consideration of climate risks to infrastructure not noted</li> <li>● Risks re road traffic not noted</li> </ul>
<p>Impacts on ecosystem services</p> <p>A project's direct impacts on key ecosystem services (such as provisioning and regulating services) may result in adverse health and safety risks to and impacts on communities. Avoid adverse impacts, and where avoidance is not possible, implement appropriate mitigation measures. Where appropriate and feasible, identify potential risks and impacts on ecosystem services that may be exacerbated by climate change</p>	<p><b>Addressed</b></p>
<p>Hazardous materials management and safety</p> <ul style="list-style-type: none"> <li>● Avoid or minimize potential community exposure to hazardous materials and substances that may be released by the project</li> <li>● Where there is a risk of exposure to hazards, including to workers and their families, exercise special care to avoid and minimize exposure by modifying, substituting, eliminating the condition or material causing potential hazard</li> <li>● If hazardous materials are part of existing project infrastructure, exercise special care when decommissioning in order to avoid exposure</li> <li>● Exercise commercially reasonable efforts to control safety of deliveries and transportation and disposal of hazardous wastes</li> </ul>	<p><b>Partially addressed.</b> Use and release of hazardous materials addressed generally in MS7 Resource Efficiency and Pollution Prevention, but not as specific</p>
<p>Emergency preparedness</p> <ul style="list-style-type: none"> <li>● MS7 includes developing emergency preparedness plans for dams, but may be broadened</li> <li>● Identify and implement measures to address emergency events and assist and collaborate with affected communities and local agencies and other relevant parties in their preparations to respond effectively to emergency situations</li> <li>● Document emergency preparedness and response activities, resources, and responsibilities and disclose appropriate information</li> </ul>	<p><b>Addressed</b> (though not as specific)</p>
<p>Community exposure to disease</p> <ul style="list-style-type: none"> <li>● Avoid or minimize the potential for community exposure to waterborne, water-based, water-related, and vector-borne diseases, and communicable and noncommunicable diseases that could result from project activities, taking into consideration differentiated exposure to and higher sensitivity of vulnerable groups</li> <li>● Avoid or minimize transmission of communicable diseases that may be associated with influx of temporary or permanent project labor</li> </ul>	<p><b>Partially addressed</b></p> <ul style="list-style-type: none"> <li>● Exposure to disease addressed generally</li> <li>● Disease risks associated with influx of project workers not noted</li> </ul>

*(continued)*

**Table 7.2 Coverage gaps and points of emphasis identified in 2017 IEO review** *(continued)*

GEF 2011 Policy on Agency Minimum Standards on Environmental and Social Safeguards		GEF 2018 Policy on Environmental and Social Safeguards
Use of security personnel	<ul style="list-style-type: none"> <li>● If retain direct or contracted workers to provide security to safeguard personnel or property, assess risks posed by these security arrangements to those within and outside project site</li> <li>● Arrangements to be guided by principles of proportionality and Good International Industry Practice (GIIP), and by applicable law, in relation to hiring, rules of conduct, training, equipping, and monitoring of such security workers</li> <li>● Make reasonable inquiries to verify personnel not implicated in past abuses, ensure they are trained adequately in use of force, and where applicable firearms, and appropriate conduct</li> <li>● Require them to act within applicable law and requirements</li> <li>● Consider and where appropriate investigate all allegations of unlawful or abusive acts of security personnel, take action (or urge appropriate parties to take action) to prevent recurrence, and report unlawful and abusive acts to relevant authorities</li> </ul>	<b>Partially addressed</b> , but very generally (“security arrangements to be proportional and consistent with applicable national laws and GIIP”).
<b>MS 8. Accountability and Grievance Systems</b>	No additional provisions. Some recent safeguard frameworks emphasize that stakeholder access to grievance redress mechanisms is required for all projects	MS2 “Accountability, Grievance and Conflict Resolution” includes additional provision on minimizing risk of retaliation
<b>Additional areas/standards:</b>		
Labor and Working Conditions	Standard to promote safe and healthy working conditions	New MS8 “Labor and Working Conditions”
Objectives/scope	<ul style="list-style-type: none"> <li>● Promote safe and healthy working conditions, and health of workers</li> <li>● Promote fair treatment, nondiscrimination, and equal opportunity of project workers and compliance with national employment and labor law</li> <li>● Protect project workers, including vulnerable populations such as women, persons with disabilities, children (of working age, in accordance with this ESS), and migrant workers, contracted workers, community workers, and primary supply workers, as appropriate</li> <li>● Prevent use of all forms of forced labor and child labor</li> </ul>	<b>Addressed.</b> Points addressed in requirements of MS8
Terms and conditions of employment	Establish written labor management procedures that set out how project workers will be managed in accordance with national law and project requirements, including provision of clear, understandable documentation of employment terms and conditions, including rights under national law; regular payment of workers, permitting only allowable deductions; provision of adequate periods of rest, holiday, sick, maternity and family leave, as required under national labor laws; written termination notice, where required, and payment of all owed wages on or before termination	<b>Addressed.</b> Written labor management procedures required and criteria noted
Nondiscrimination and equal opportunity	<ul style="list-style-type: none"> <li>● Decisions regarding employment and treatment of workers will not be made on personal characteristics unrelated to inherent job requirements. Employment decisions to be based on principles of nondiscrimination and equal opportunity and fair treatment</li> <li>● Provide appropriate measures to prevent harassment, intimidation, exploitation, and to assist vulnerable workers (e.g., women, migrants, disabled, and children)</li> </ul>	<b>Addressed</b>
Workers’ organizations	Respect workers’ rights to form or join workers’ organizations of their choosing and to bargain collectively without interference	<b>Addressed</b>

*(continued)*

**Table 7.2 Coverage gaps and points of emphasis identified in 2017 IEO review** *(continued)*

GEF 2011 Policy on Agency Minimum Standards on Environmental and Social Safeguards		GEF 2018 Policy on Environmental and Social Safeguards
Occupational health and safety	<ul style="list-style-type: none"> <li>● Provide safe and healthy working environment, taking into account inherent risks in particular sector and specific classes of hazards, including physical, chemical, biological, radiological, and specific threats to women</li> <li>● Take steps to prevent accidents, injury, and disease arising from work by minimizing as far as reasonable the causes of hazards</li> </ul>	<b>Addressed</b>
Forced labor	Will not employ forced labor (any work of service not voluntarily performed that is extracted from an individual under threat of force or penalty; provision covers any kind of involuntary or compulsory labor, such as indentured labor, bonded labor, or similar labor-contracting arrangements)	<b>Addressed</b> , although not defined
Child labor	<ul style="list-style-type: none"> <li>● Do not employ children in any manner that is economically exploitative or is likely to be hazardous or to interfere with child's education, or to be harmful to child's health or physical, mental, spiritual, moral, or social development</li> <li>● Where national laws provide for employment of minors, comply with national laws and regulations</li> <li>● Children under the age of 18 will not be employed in hazardous work, and all work of children under 18 years old will be subject to appropriate risk assessment and regular monitoring of health, working conditions, and hours of work</li> </ul>	<b>Addressed</b>
Contracted and supply chain workers	<ul style="list-style-type: none"> <li>● Make reasonable effort to ascertain third parties who engage contracted workers are legitimate, reliable, and have labor management procedures in place that allow them over time to operate in accordance with Minimum Standards</li> <li>● Identify risks of child labor, forced labor, and serious safety issues in relation to primary suppliers, and require they be remedied where identified</li> </ul>	<b>Not addressed</b>
Grievance mechanism	Provide and inform workers of accessible grievance mechanism to raise workplace concerns	<b>Addressed</b>

# Gender equality policy

**I**n 2017 the GEF IEO undertook an Evaluation on Gender Mainstreaming (GEF IEO 2018c). This chapter provides an update on the recommendations flowing from this report that focused on the implementation and impact of the GEF's 2011 policy, the alignment of GEF's gender equality commitments with best practices.

## 8.1 Background and context

While women are not described as prominent stakeholders in the 1996 Public Involvement Policy they are referenced in this foundational document (GEF 1996). The policy mentions collaboratively engaging with women as part of “disadvantaged populations in and around the project site” (GEF IEO 2018c, 1). The evolution of the GEF's policies on gender equality is summarized in [table 8.1](#).

The Policy on Gender Mainstreaming was approved by the Council at the 40th Council Meeting in May 2011 (GEF 2011b). The policy was initially adopted as an annex in the GEF Policies on Environmental and Social Safeguards Standards and Gender Mainstreaming but was later issued as a stand-alone policy (GEF 2012a).

The policy explicitly recognized GEF's goal of taking better advantage of strategic opportunities to address gender inequality and promote women's empowerment where these can help bring about global environmental benefits. It calls on GEF and its partner Agencies to mainstream gender in GEF operations, with efforts to analyze and address the specific needs and roles of both women and men (GEF 2011b).

The Gender Equality Action Plan (GEF 2014a) was approved at the 47th GEF Council in October 2014. The GEAP was developed in collaboration with GEF Agencies, secretariats of the relevant multilateral environmental agreements, and other experts (including climate funds like the CIF and the GCF), to narrow existing gaps, and enhance implementation of actions on gender mainstreaming at both corporate and focal area levels (GEF IEO 2018c). The GEAP covered the fiscal year period 2015–18 (GEF-6) and aimed to operationalize the Policy on Gender Mainstreaming, including a workplan with concrete steps and key actions and outputs addressing five key elements: project cycle, programming and policies, knowledge management, results-based management, and capacity development.

**Table 8.1 Evolution of gender policies at the GEF**

<b>1996 Policy on Public Involvement</b>	<ul style="list-style-type: none"> <li>• Foundational GEF policy on public engagement</li> <li>• Addressed gender peripherally</li> </ul>
<b>2011 Policy on Gender Mainstreaming</b>	<ul style="list-style-type: none"> <li>• Approved at the 40th Council Meeting in 2011</li> <li>• Operationalized through the Gender Equality Action Plan in 2014 for GEF-6 (2015–18)</li> </ul>
<b>2017 Gender Equality Policy</b>	<ul style="list-style-type: none"> <li>• Supersedes 2011 Policy</li> <li>• Approved at the 53rd Council meeting in 2017</li> <li>• Operationalized through the Gender Implementation Strategy (2018) for GEF-7 (2018–22)</li> <li>• Gender Policy Guidelines (2018) provide project specific guidance and gender tags</li> </ul>

The action plan provided a stepwise approach to achieving the goals and objectives of the 2011 GEF Gender Policy by ensuring that project activities and progress toward gender equality results could be better designed, implemented, and reported (GEF IEO 2018c). To implement the activities under the GEAP, a GEF Gender Partnership was established. It remains active today.

While the 2011 Policy on Gender Mainstreaming did not describe or define gender mainstreaming, the GEAP adopted the United Nations Economic and Social Council (ECOSOC) definition of gender mainstreaming ([box 8.1](#)).

#### **Box 8.1 Gender mainstreaming defined**

“Gender mainstreaming is a globally accepted strategy for promoting gender equality and is the process of assessing the implications for women and men of any planned action, including legislation, policies or programs, in any area and at all levels. It also addresses concerns of women and men as an integral part of the design, implementation, monitoring and evaluation of policies and programs in all political, economic and societal spheres, so that women and men benefit equally, and inequality is not perpetuated. The ultimate goal of mainstreaming is to achieve gender equality.”

**Source:** UN Women, [Gender Mainstreaming](#) webpage.

According to the GEAP, gender-responsive approaches and activities were to be incorporated in the GEF-6 focal area strategies and integrated approaches pilots, along with the five core gender indicators at the corporate level, which were monitored and aggregated at the focal area and corporate levels (GEF IEO 2018c).

An updated Policy on Gender Equality (GEF 2017b) was approved by the 53rd GEF Council in November 2017. It came into effect on July 1, 2018, for new activities and a year later for activities under implementation. The updated policy gives explicit attention to gender by the conferences of the parties to the multilateral environmental agreements as well as the Sustainable Development Goals.

The recent gender policy makes a shift from a “do no harm” approach to a more hands-on, gender-responsive approach. The updated policy differs from its predecessor by its focus on guiding principles and mandatory requirements ([box 8.2](#)). Specific changes to the policy include:

- Clarification of the GEF’s approach to mainstream gender and promote gender equality and the empowerment of women;
- Formalization and clarification of GEF requirements for addressing gender equality in GEF-financed activities; and
- Introduction of a clearer focus on results, including requirements for program and project-level

### Box 8.2 GEF 2017 Gender Equality Policy: mandatory requirements

The GEF's 2017 Gender Equality Policy introduced mandatory policy requirements in four areas:

- **Project and analysis or an equivalent socioeconomic assessment that describes gender differences and program cycle.** At or prior to CEO endorsement/approval, Agencies are required to provide gender gaps relevant to the proposed activity; corresponding gender-responsive measures to address differences, risks, and opportunities through a gender action plan or equivalent; and a results framework including actions with gender-sensitive indicators and sex-disaggregated targets. In its review of program framework documents, project identification forms, and requests for CEO endorsement/approval, the Secretariat assesses whether the documentation reflects the policy's provisions.
- **Monitoring, learning, and capacity development.** The Secretariat tracks and reports annually to the Council (and as required to the multilateral environmental agreements that the GEF serves) on portfolio-level progress, sex-disaggregated data, gender information, and results.
- **Agency policies, procedures and capabilities.** The policy requires Agencies to demonstrate that they have the necessary policies, procedures, and abilities to ensure that:
  - Gender analyses, socioeconomic assessments, or equivalent are applied to inform gender-responsive design, implementation, and monitoring and evaluation of Agency activities;
  - Agency activities do not exacerbate existing gender-related inequalities;
  - Implemented Agency activities provide equal opportunities for men and women;
  - Women and men are provided equal opportunities by the Agency for participation and decision making in the various phases of the project; and
  - Collection of gender-disaggregated data in indicators, targets, and results as relevant is consistently included in monitoring, evaluation and reporting of Agency activities.
- **Compliance.** The Secretariat facilitates an assessment of Agencies' compliance with the requirements set out in (3) above, for Council review within 18 months of the policy effectiveness date. If an Agency does not meet these requirements the Secretariat works with the Agency to develop a concrete, time-bound action plan to achieve compliance.

Source: GEF 2017b.

monitoring and reporting on gender by Agencies, and portfolio-level monitoring and reporting on performance and results by the Secretariat.

The Gender Implementation Strategy (GEF 2018b) was approved at the following Council Meeting in June 2018. The strategy describes three specific inequalities and gaps that are relevant to GEF's work: inequitable access to and control of natural resources; unequal opportunities in environmental decision making and leadership; and uneven access to socioeconomic benefits and services. Strategic entry points to address these gaps

for GEF-7 are identified in the strategy as priority action areas, including the following:

- Systematic promotion of gender-responsive approaches and results in GEF programs and projects;
- Strengthened capacity of the GEF Secretariat and its partners to mainstream gender and seize strategic entry points to promote gender equality and women's empowerment;
- Improved connection between the GEF and its partners to generate knowledge and contribute

to learning on links between gender and the environment; and

- Enhanced GEF corporate systems for tracking and reporting on gender equality results.

The strategy includes roles and responsibilities in implementing the Policy on Gender Equality and the Gender Implementation Strategy for both the GEF Council and the Secretariat.

The strategy presents a GEF-7 Results Framework on Gender Equality and Women’s Empowerment (GEWE) with indicators, baseline data (where available), and verification methods for two outcome areas: (1) gender-responsive GEF program and project design and development; and (2) gender-responsive program and project reporting and results. Reporting on progress against the strategy is provided through annual progress reports. These reports provide an overview of progress related to the GEF-7 portfolio and the GEWE, and describe key activities undertaken by the Secretariat related to the four action areas outlined in the strategy (GEF 2019c).

To support the implementation of the Gender Equality Policy, the GEF Guidance on Gender Equality (GEF 2018e) was developed with extensive input from the GEF Gender Partnership (GGP). The guidance elaborates on policy requirements, provides strategic entry points with steps and checklists for every stage of the project cycle, and incorporates relevant mandatory requirements from the Policy on Stakeholder Engagement. It also provides details on applying the GEF Gender Tagging Framework, which requires that GEF Agencies respond to a set of questions as part of completing the PFDs/PIFs and CEO endorsement/approval requests.

Attention to gender is also seen in the broader GEF strategy. The GEF 2020 Strategy was approved by the GEF Council at the 46th Council meeting in May 2014. It provides core operational principles for the GEF’s operational system. Under the principle

of mobilizing local and global stakeholders, the strategy states that, “The GEF will continue to strengthen its focus on gender mainstreaming and women’s empowerment...The GEF will emphasize the use of gender analysis as part of socioeconomic assessments...” and “gender-sensitive indicators and sex-disaggregated data will be used in GEF projects to demonstrate concrete results and progress related to gender equality” (GEF 2015, 30).

## 8.2 Overview of 2017 IEO evaluation

The Gender Equality Action Plan called for a review and, as necessary, an update of the Policy on Gender Mainstreaming by July 2018. In 2017, the IEO presented its Evaluation of Gender Mainstreaming in the GEF to Council. The evaluation covered three areas: the extent to which the Policy had been implemented by means of the GEAP; the appropriateness of the policy for the GEF and its implementation in line with international best practices; and the trends of gender mainstreaming in the GEF since the Fifth Overall Performance Study (OPS5).

The main findings of the evaluation are set out below:

- Trends in gender mainstreaming in the GEF showed modest improvement over the previous OPS period (OPS5).
- Very few projects conducted gender analyses despite it being one of the minimum requirements of the Policy on Gender Mainstreaming. For a cohort of projects from OPS6, only 13.9 percent of medium-size projects and full-size projects in a quality-at-entry review and 15.7 percent of completed projects had done a gender analysis prior to CEO endorsement/approval. Those projects that did conduct a gender analysis achieved higher gender ratings.



- The Policy on Gender Mainstreaming increased attention to and performance of gender considerations in GEF operations, but there was a lack of clarity around its framework and certain provisions and implementation. The 2017 evaluation found that the policy left too much room for interpretation on gender analysis and on the responsibilities of the GEF Agencies vis-à-vis the GEF Secretariat regarding its implementation.
- Institutional capacity to implement the policy and achieve gender mainstreaming was found to be insufficient within the GEF Secretariat.
- The 2017 evaluation found that the GEAP has been a relevant and effective framework for implementing the Policy on Gender Mainstreaming. The GEAP facilitated implementation; annual reports provided by the Secretariat were seen as useful and the evaluation emphasized that a strong action plan facilitates strategic priority setting and can promote the agenda on gender mainstreaming.

Based on these findings, the evaluation recommended:

- Revising the Gender Mainstreaming Policy
- Developing an action plan for implementing the policy during GEF-7
- Ensuring that adequate resources are made available for gender mainstreaming activities.

The extent to which these recommendations were taken up by the GEF is discussed in the following section.

## 8.3 Extent to which recommendations have been taken up

### REVISE THE POLICY TO ALIGN WITH BEST PRACTICE STANDARDS (RECOMMENDATION A)

With the creation of the updated Gender Equality Policy and activities to support its implementation, the recommendations of the previous IEO evaluation are substantially addressed.

The GEF is in full alignment, having addressed the four elements of this first recommendation, which are as follows:

- Anchoring the revised GEF Gender Policy in best practice standards from conventions and GEF Agencies;
- Focusing on rights-based frameworks for effective gender mainstreaming;
- Using the GGP as the vehicle for stakeholder engagement in updating the policy; and
- Developing guidance on gender analysis and responsibilities of the GEF Agencies in relation to the GEF Secretariat through the revised Gender Equality Policy.

The 2018 policy incorporates guiding principles to mainstream gender in accordance with the multilateral environmental agreements (and conventions) that the GEF serves. It recognizes related international commitments to gender equality and human rights, thereby emphasizing rights-based frameworks for gender mainstreaming. The accompanying guidelines elaborate on a gender-responsive approach to GEF operations by highlighting that stakeholder engagement and analyses should be conducted in an inclusive and gender-responsive manner, so that the rights and varied knowledge, needs, roles, and interests of women and men are recognized and addressed.

The guidelines also suggest that to include rights-based gender approaches, it is important to identify as well as consult with stakeholders, partners, individuals, and groups such as ministries of women, and NGOs that work on gender equality, women's rights, and empowerment (GEF 2018e).

Engagement with and contributions of the GGP in the formulation of the Gender Equality Policy were substantial. Interviews with members of the GGP and the GEF Secretariat confirmed the fundamental role played by the partnership in providing technical feedback in consultative sessions on the draft of the GEF gender policy and the corresponding guidance.<sup>1</sup> As part of this work, the GGP supported moving from a “do no harm” gender mainstreaming approach to a gender-responsive approach that is part of the gender policy.

As a follow-up to the recommendation on providing more clarity on gender analysis and responsibilities of the GEF Agencies relative to the GEF Secretariat, the gender policy lays out “Agency policies, procedures, and capabilities” (GEF 2017b, 8). This includes the requirement for Agencies to demonstrate they have policies, procedures and capabilities to conduct gender analysis, socio-economic assessments, or equivalent to inform gender-responsive design, implementation, and monitoring and evaluation, including budgeting and staffing, of Agency activities. The policy then distinguishes between the roles of the Agency and the GEF Secretariat and says that if an Agency does not meet the requirements mentioned above, the Agency will consult with the Secretariat to develop a timebound action plan to achieve compliance. The Secretariat would then submit the action plan for

review and approval to the Council on behalf of the Agency. When the Agency meets the requirements, the Agency and the Secretariat will periodically report and monitor compliance, relying on the Policy on Monitoring Agencies' Compliance.

## **DEVELOP AN ACTION PLAN FOR IMPLEMENTING THE GENDER EQUALITY POLICY DURING GEF-7 (RECOMMENDATION B)**

Again, the GEF met expectations in preparing the ground for policy implementation. This included developing and finalizing comprehensive guidelines, tools, and methods in collaboration with the GGP. The GGP had a key role in bringing together knowledge and best practices from GEF Agencies, other climate funds, and secretariats of relevant conventions and other partners. The guidelines and actions plans were developed within the requested timeline and were released/approved when the policy became effective in July 2018.

At the corporate level, the Gender Implementation Strategy operationalizes the GEF Gender Equality Policy. It is organized around identified gender gaps and pegged to corresponding strategic entry points for promoting gender equality and women's empowerment in the context of GEF-7 programming.<sup>2</sup> The strategy document builds on insights from multiple sources including the 2017 evaluation, analysis carried out by the GEF Secretariat, and consultations with GEF Agencies and the multi-stakeholder GGP.

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<sup>1</sup> Even though the gender policy document does not mention the GGP per se, the Gender Implementation Strategy mentions the role of the GGP in the formulation of the gender policy. Source: A footnote in the Gender Implementation Strategy mentions a [news link](#) from the GEF website.

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<sup>2</sup> The GEF Gender Implementation Strategy identifies three gender gaps most relevant to GEF projects and programs in the GEF-7 programming directions: unequal access to and control of natural resources; unbalanced participation and decision making in environmental planning and governance at all levels; and uneven access to socioeconomic benefits and services.

At the project level, the updated policy contains a requirement for upstream analytical work in all medium and full-size projects wherein they must conduct a gender analysis or equivalent socioeconomic assessment at, or prior to, CEO endorsement. The GEF gender guidelines describe the gender analysis as “an analytical process used to identify, understand, and describe gender differences and the relevance of these differences to a specific activity (policy, program or project)” (GEF 2017d, 9). Gender analysis is considered part of social analysis and the results from gender analysis contribute to the strategic direction of project design and implementation.

The scope of the analysis can vary, and the analysis can be conducted in many ways, depending on GEF Agency policies and procedures, as well as the specific program/project context. The Guidelines elaborate that the analysis should include gender assessments and sex-disaggregated data. There is some flexibility on how gender analysis can be included. It could be as a stand-alone activity or as part of a stakeholder analysis or social and situation assessments. Data and information that already exist, such as sectoral assessments, country gender assessments, gender analyses of prior or similar projects, and national statistics available from databases, can support the analysis.

Furthermore, the GEF Policy on Gender Equality requires that the gender analysis feed into a gender action plan (or equivalent), described as any planned gender-responsive measures to address differences, as well as identify impacts, risks, and opportunities. The gender action plan is a segue between gender analysis and implementation and is a tool to help translate findings of the gender analysis in program/project implementation and evaluation. As such, an action plan is usually context specific.

## **ENSURE ADEQUATE RESOURCES TO SUPPORT GENDER MAINSTREAMING (RECOMMENDATION C)**

The GEF has made substantive progress on this recommendation in terms of building its internal staff capacity and leveraging supportive resources from across the partnership.

Since 2018, the GEF has augmented its in-house capacity to deliver on the policy. Currently, GEF’s senior gender specialist (hired in 2016) is assisted by additional trained staff to support gender-related initiatives. One such initiative was the 2018 launch of the Guidance to Advance Gender Equality manual to support integration of the updated policy around the GEF project cycle. There have been occasional internal training sessions on gender, and some checklists have been provided to GEF staff. As before, there is no stand-alone budget line allocated for gender mainstreaming.

On the second part of the recommendation regarding leveraging resources, much progress has been made mostly through the GGP. The GGP has emerged as a strong knowledge sharing, knowledge exchange, and capacity development forum among GEF Agencies. It is moderated by the GEF Secretariat, with members meeting on a regular basis to share ongoing gender-focused work at their Agencies. The GGP members described GGP meetings as productive in several ways, including peer learning on integrating gender dimensions across the project cycle, and bridging gender-related knowledge gaps by connecting project staff and gender specialists.

## 8.4 Adequacy of the 2018 Gender Equality Policy and Guidance

### ALIGNMENT WITH COMPARATOR ORGANIZATIONS

This section addresses the extent to which the updated Gender Equality Policy aligns with the gender policies of comparator organizations. It builds from best practices identified in the previous IEO Evaluation of Gender Mainstreaming in the GEF. The evaluation examined the gender policies, strategies, and action plans of the GEF against those of other climate funds, identifying best practices along 10 dimensions. This analysis compares the updated Gender Equality Policy with the gender policies in organizations that have also updated their gender policies since the 2017 evaluation. These include three climate funds—the GCF (GCF 2019), the Adaptation Fund (AF 2020), and the CIF (CIF 2018)—and a GEF Agency, the United Nations Industrial Development Organization (UNIDO 2019).

The GEF gender policy aligns well with comparator organizations on international best practices. However, gaps are seen along two dimensions. The first relates to clarity of roles for gender focal points, and deployment of Agencies' location-based gender units to support policy implementation. The second is on the extent to which financial data tracking reflects GEF's gender equality policy commitments, and helps support institutional accountability for targets set and achieved. Filling these two gaps would allow for establishing a more uniform system of gender focal points to implement the GEF gender policy, along with clear roles, budget, and tasks on gender programming. Since GEF does not have country offices, this would have to be done through Agency staff—potentially Agency headquarters staff—and then applied to Agency country offices. The commentary is set out in [table 8.2](#).

### SUPPORT FOR POLICY IMPLEMENTATION

GEF support for policy implementation is analyzed along three dimensions: orientations and trainings (including ECW presentations, introduction to the GEF, etc.); the project review process; and knowledge sharing.

#### ORIENTATIONS AND TRAININGS

The first category of implementation support relates to presentations, orientations, and trainings provided by the GEF. These are generally well received and perceived as adequate by attendees. While they provide good general information, participants noted that they do not provide technical/practical information for policy implementation. Examples of these include: the annual Introduction to the GEF event, which dedicates sessions to introduce new Agency staff to the policies; sessions on the policies presented by GEF staff at ECWs; and any online training sessions. In general, feedback from Agencies and OFPs on the adequacy of these types of activities was positive; they saw the information provided as adequate.

Agency key informants reported generally low levels of attendance at training sessions or related activities. Very few Agency staff reported attending gender-focused trainings or orientations hosted by the GEF, and of the OFPs surveyed, 32 percent reported attending a session where they received information on the Gender Equality Policy (usually at ECWs or Introduction to the GEF seminars). Among those attending these activities, Agency and OFP participants had mostly positive feedback on their adequacy.

Demand for training is Agency and stakeholder dependent. Larger Agencies reported less demand for the GEF to provide training on policy implementation. By contrast, the newer GEF Agencies and OFPs indicated higher demand for information and,

**Table 8.2 2018 Policy on Gender Equality: assessment of alignment**

Best practice dimension	Degree of alignment
Gender policies focus on human rights, and economic, social, and environmental aspects of sustainable change	<b>Fully aligned.</b> The GEF Gender Equality Policy and the gender policies of the comparator institutions focus both on human rights and on economic, social, and environmental aspects of sustainable change to address gender equality. For example, the UNIDO Gender Policy says that UNIDO will use a comprehensive approach that is human rights-based and intersectional to operationalize the principles of gender equality. Intersectionality refers to social categories such as race, class, economic status, and gender, thereby going beyond a human rights-based approach.
Gender policies linked to corporate strategic plans and results frameworks to mainstream gender at the highest levels and connect its relevance to the institution's mandate	<b>Fully aligned.</b> The gender policies of the four comparator institutions and the GEF were linked to corporate strategic plans or results frameworks at the highest levels. For example, the AF gender policy says that quantitative and qualitative gender monitoring for program/project impacts will be integrated into the Fund's Results-based Management (RBM) framework (AF 2020). The CIF gender policy serves as a governance framework for gender integration at CIF in its internal processes.
Mandatory gender analysis/assessments or socioeconomic analysis in project preparation	<b>Fully aligned.</b> All organizations, including the GEF, require a gender analysis or gender assessment during project preparation. While the GEF, GCF, AF, and UNIDO require a stand-alone gender assessment, the CIF gender policy requires gender considerations to be included in the sector analysis during the project preparation phase.
Women's participation at all levels of decision making in targeted interventions and projects	<b>Fully aligned.</b> The GEF gender policy requires GEF Agencies to demonstrate that they have the necessary policies, procedures, and capabilities to ensure that women and men are provided equal opportunities for participation and decision making throughout the project cycle (GEF 2017b). At the project level, the GEF gender policy addresses women's participation through gender tags (also known as gender gaps) that help with identifying strategic entry points relevant to the GEF-7 programming strategy. Women's participation is addressed through one of the three gender tags/gaps, "improving the participation and decision-making of women in natural resource governance." Specifically, the GEF Gender Implementation Strategy says that addressing gender gaps related to participation and leadership in decision making processes, from the local to global levels, can help make institutions more representative, and help women engage in decisions on environmental planning, policymaking, and sustainable solutions and practices." The GEF gender guidelines provide more detail on addressing gender dimensions at the project level and address participation of women in various project phases, such as stakeholder analysis, gender analysis, and the midterm review.
Gender advisors and gender focal points, and location of gender units to apply gender policies	<b>Partially aligned.</b> Most gender policies mention the role of gender focal points to implement the policy (like the GEF, CIF, GCF, and UNIDO), but these roles remain mostly an add-on to existing roles or job titles. Being part of a larger role description can limit what can reasonably be asked of a focal point given the variability of time and resources. The UNIDO gender policy is the only one that clearly refers to a well-defined role for gender focal points linked to a network that is location based (at headquarters and in the regional, country, and liaison offices). The UNIDO policy also highlights that gender focal points have a clear scope of work. The GEF refers to having gender advisors and gender focal points, but does not specify roles for them, and does not include location-based gender focal points.
Institution-wide mandate for gender mainstreaming and institutional capacity building	<b>Fully aligned.</b> Among the gender policies reviewed, the GEF, AF, and UNIDO clearly mentioned an institution-wide mandate for gender mainstreaming. For example, the GEF gender policy sets out mandatory requirements for mainstreaming gender across the GEF's governance and operations to support the GEF's mandate to achieve global environmental benefits (GEF 2017b). Similarly, the AF's gender policy and its mandates are an integral part of the Fund's strategic focus and underlying theory of change (AF 2020).
Allocated and adequate human and financial resources to implement gender policies	<b>Not aligned.</b> The GCF, AF, CIF, and UNIDO all allocate financial and human resources for the implementation of their gender policies. For example, the CIF gender policy requires CIF to provide for sufficient staffing for the gender function at senior and junior levels in the CIF Administrative Unit to ensure specialist gender program leadership and guidance. In addition, the CIF Administrative Unit is supposed to monitor and report on its own unit staffing levels at analyst level and above in order to track gender parity in staffing (CIF 2018).
Tracking financial data on gender equality for institutional accountability and to assess financial targets	<b>Not aligned.</b> The GEF and most of the comparator organizations (except CIF and UNIDO) do not track financial data on gender equality. However, the CIF gender policy, in line with good practice principles on "gender budgeting," mandates that a separate budget line for the gender program be maintained in the CIF Administrative Unit operating budget (CIF 2018).
Accountability for translating gender mainstreaming at all levels of the institution, from technical staff to management	<b>Fully aligned.</b> Most organizations have accountability measures for translating gender mainstreaming into practice with policy implementation at all levels of the institution. For example, the GEF gender policy applies to the Council, the Secretariat and all GEF Partner Agencies, instilling accountability and responsibility for policy implementation at the highest levels. Similarly, the AF's gender policy says the Fund is accountable for its gender mainstreaming efforts and its gender-responsive adaptation results and outcomes, including through regular annual reports, as appropriate, in a transparent and comprehensive manner (AF 2020).

**Note:** AF = Adaptation Fund; UNIDO = United Nations Industrial Development Organization.

in particular, information beyond a general introduction. Mentions included: technical training, practical examples, and case study/best practice examples of applying the policy requirements to GEF-financed activities. Insights shared on what makes for good gender training included: sessions designed in collaboration with other organizations (especially those with resources, expertise and a track record delivering effective training sessions); inclusion of staff beyond those assigned gender equality roles/assignments; shorter training sessions for clients; and more opportunities for online asymmetric learning along the lines of the GEF-UN LEARN's online Gender and Environment course, featured in [box 8.3](#).

The majority of Agency informants interviewed were aware of the online course. The Gender Equality Policy is the only policy supported by this kind of resource. It is the creation of the GGP in collaboration with the GEF, UNDP, and the GEF SGP, and is hosted by UN CC:LEARN. The [course](#) is targeted to environmental specialists, development practitioners, and policy makers or government officials and aims to help participants better understand the linkages between gender and environment. The course is available in English, French, and Spanish.

## BUSINESS PROCESSES

The GEF provides support for policy implementation through its business processes, which includes the approval processes for programs and projects. Although many Agency gender staff interviewed for the evaluation had limited interactions with the GEF Secretariat, those that did said that they found them uniformly responsive and helpful.

### Box 8.3 GEF-UN LEARN's gender and environment course

Modules for the six-hour course cover: gender and environment, gender and biodiversity, gender and climate change, gender and land degradation, gender and international waters, and gender and chemicals and waste. Certificates are issued for each module as well. To date, more females than males have attended the course (63 percent female, 36 percent male, and 1 percent other).

After approximately two years, enrollment has reached 15,526. The completion rate for the entire course (all six modules) is relatively low at 8.5 percent, but completion numbers for specific modules are higher. The majority of the course participants have been affiliated with academia (26 percent) or identified as other (26 percent), followed by NGOs (14 percent) and private sector (11 percent). Participants as of January 2021 are from 189 countries with the largest number from India, followed by the United Kingdom, Brazil, Nigeria, and the United Arab Emirates.

**Source:** Reporting provided by the GEF Secretariat. For more information, see course description on [UN CC:e-Learn](#).

## KNOWLEDGE SHARING: THE GEF GENDER PARTNERSHIP

The GGP, coordinated by the GEF Secretariat, has emerged as a strong knowledge-sharing forum for the GEF Agencies on gender issues. The establishment of the GGP is considered one of the most significant achievements of the GEAP (GEF IEO 2018c). The GGP brings together gender focal points and gender specialists of GEF Agencies, other climate funds, and relevant partners (including CSOs). The GGP meets periodically and is coordinated by gender staff at the GEF Secretariat. The platform provides members with an opportunity to connect professionally to share knowledge on how gender issues are addressed in their Agencies' policies and programming. The diversity of

vantage points on gender equality in the GGP is felt to enrich the discussion. This evaluation sought to learn from the GGP model for its strengths, weaknesses, and replicability.<sup>3</sup>

The most prominent among its identified strengths is its presence as a supportive network of professionals working on similar gender and environment issues. It is considered a great place to learn from peers, especially given the varied size and resources among Agencies. Focal points from smaller Agencies find the interactions at the GGP especially helpful to overcome feeling isolated as the only, or one among a few, gender-focused staff in their own organizations.

Noted constraints tend to be operational in nature. Rotation of members in the partnership can disturb the learning process. Those members leaning on the GGP as a vital source of support seek more frequent interactions from the partnership. And, for some, resource constraints are said to hold the GGP back from a desired higher level of organization wherein the GGP curates knowledge. The creation of the gender and environment online course is seen as an example of what can be created with the convergence of funds, talents, and expressed need. Suggestions for content curation included consolidating learning and knowledge management so that gender results become more visible across Agencies.

On replicability and scalability of the GGP model, GGP members see the organizational model as replicable within the broader inclusion realm, that is, pertaining to stakeholder engagement and/or environmental and social safeguards. The one cautionary note in applying the model to the broader field of engagement and inclusion pertains to the

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<sup>3</sup> The GGP assessment relied on a focus group with GGP organized by the IEO, key informant interview with GEF Secretariat staff and GGP members, as well as a document review.

possible difficulty delineating an optimal mix of personnel to join the conversation. In comparison to gender, these practice areas are more widely distributed across the partnership. A second consideration pertains to the purpose of the GGP model were it to be applied outside of its current confines. Regardless of application, GGP members see learning as an essential *raison d'être*.

The GGP's convening power on gender issues is evident through the cross learning and dissemination of knowledge and tools through Agencies' own networks. Agency representatives described how they have taken back guidance, tools, templates, and other information learned through the GGP over the years.

Member ideas for possible inclusion in the GGP's continuing knowledge sharing agenda are set out in [box 8.4](#).

## 8.5 Buy-in for the gender policy

The analysis of buy-in for the Gender policy focuses on the extent to which Agencies see the policy as a facilitator, and on a discussion of the constraints they face in implementing the policies.

### GEF GENDER POLICY AS A FACILITATOR FOR AGENCIES

Agencies reported having their own gender policies. Even so, external validation from a donor like the GEF was considered beneficial, especially for management and project staff buy-in. For example, smaller Agencies that had a recently formulated a gender policy found the GEF's Gender Equality Policy to be a helpful tool to use along with their own internal gender policy, especially for putting gender dimensions on the organizational map. Smaller Agencies also indicated that the GEF

#### **Box 8.4 Top-of-mind ideas for the GEF Gender Partnership**

- Collaborative development and use of gender-focused, “best practice” oriented knowledge products
- Developing/refining metrics to understand, among other things: gender access to natural resources, participation in decision making, and gender and the distribution of socioeconomic benefits
- Capturing results and impacts of gender policy implementation
- Designing an online community of practice

Source: IEO focus group discussions with GGP.

gender policy facilitated integrating gender dimensions in project design and implementation.

The commonalities and complementarities between the Agency and the GEF’s gender policy were considered helpful. Most Agencies reported applying a combination of their own gender policy along with requirements of the GEF Gender Policy, with overlaps between the Agency and the GEF policies to facilitate gender-focused reporting and coverage. For example, one Agency said that reporting for the GEF Gender Policy informs their own reporting since there are a number of linkages between the GEF and the Agency’s policies. Corporate frameworks at the Agency for gender mainstreaming in-house (on elements such as project-level indicators and tagging) also trickle down to the GEF implementation team. As such, the GEF gender policy facilitates internal processes of Agencies on gender-focused reporting, and linkages between the GEF and Agency gender policies helps implement in-house corporate frameworks on gender mainstreaming.

Agencies have found the GEF Gender Policy requirement on “clarifying entry points” (also

mentioned as gender gaps and gender tags)<sup>4</sup> has made project staff think about gender differently than before and assisted with integrating gender issues in projects. These three entry points are: supporting women’s improved access to and control of natural resources (including land, water, forest, and fisheries); enhancing women’s participation and role in natural resources-related decision-making processes (at the community, local and national levels, including producer organizations, cooperatives, and labor unions); and targeting women as beneficiaries for better access to socioeconomic benefits and services.

## **CONSTRAINTS/ BARRIERS ENCOUNTERED IN APPLYING THE GEF GENDER POLICY**

The uneven availability of gender data has challenged the partnership in showing progress against its gender equality commitments. Some Agencies have experienced a lack of gender data in the project identification and design stages, while others have faced challenges related to gender-focused data collection during project implementation and closing. Overall, more Agencies indicate having adequate project-level gender data in the design phase with diminishing information during implementation. Variability in the level of resources allocated to gender tracking in projects is mentioned.

Agency-level capacity issues related to policy requirements have affected implementation in some settings. Agency informants indicated that it has been difficult to convince teams that gender dimensions are important across program and project settings. Agency efforts to boost capacity with the gender consultant support have been met with mixed results. Capacities gained and plans

<sup>4</sup>The gender tags focus on tracking GEF’s contribution to narrowing the three key gender gaps (GEF 2018b).



made during the design stages have dissipated in implementation. The role of Agency gender focal points has not been clearly defined and in some instances has not been made sufficiently available to service teams.

Agencies also identified challenges in country-level execution of the gender policy. A lack of country-level demand on gender issues has led Agencies to spend extra time and resources to show how relevant gender is in addressing climate change issues and responding to challenging national demands.

Constraints on human resources and a lack of budget for gender staff and tools is identified as a contributor toward weak Agency capacity. GEF Gender Policy requires reporting on an annual and a biannual basis, thereby drawing heavily on gender equality human resources in some Agencies. In one instance, to overcome the lack of human resources, the Agency's management developed a rotational gender officer concept since they could not have a gender staff position due to budget constraints. This helped Agency management see more clearly the Agency's human resources needs related to policy requirements. Regarding budget constraints, the expense associated with the collection of primary data can be a deterrent to properly tooling up a team to understand the gender dimensions of a program or project.

## **POLICY COMPLIANCE: TRENDS IN THE GEF PORTFOLIO (GEF-6 AND GEF-7)**

Highlights from the portfolio review include the following:

- About half of projects share a gender analysis and action plan prior to CEO endorsement.<sup>5</sup>
- Two-thirds of projects identify at least one gender gap.
- The majority of projects
  - Either have, or plan to have, gender indicators;
  - Report on gender during implementation/PIR (but not necessarily against the gender action plan); and
  - Allocate resources for gender staff training and knowledge management (89 percent).

For the analysis of Gender Equality Policy requirements in the GEF portfolio, the portfolio sample was batched into projects CEO endorsed between January 2014 and July 2018 (143 projects—56 percent of the sample), and projects CEO endorsed between July 2018 and July 2020 (326 projects—44 percent of the sample). The July 2018 threshold marks the introduction of the updated policy.

Over the identification and design stages of the project cycle, review findings show gender included in activities in 90 percent of the projects. Prior to the introduction of the Gender Policy the frequency of inclusion was about the same at 86 percent,

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<sup>5</sup>The definition of a gender analysis, as described in the Policy on Gender Equality, was followed to assess compliance with this requirement. The portfolio review team looked for documentation that identified or described gender differences and their relevance for the specific project. For example, the following elements related to gender equality were looked for in project documentation: analysis of factors and trends that shape behaviors; activity profile of men and women; access, control, and decision-making profile; and entry points to ensure equal participation and benefits. The portfolio review team made a determination on the existence of a gender analysis or equivalent when some of the elements above were soundly described, either in a specific "gender analysis" document or in sections of other relevant project documents.

indicating little change with the introduction of the updated policy.

There is, however, a “before/after” differential across the two groups of projects on the following variables:

- Mention of stakeholder consultations including individuals or groups with a gender perspective, increasing from 18 percent to 30 percent;<sup>6,7</sup>
- Inclusion of a gender analysis in the project documentation, rising from 33 percent to 57 percent;<sup>8</sup> and
- Inclusion of a gender action plan,<sup>9</sup> up from 25 percent to 55 percent.

With the updated policy in place, the presence of these requirements the portfolio remains modest, however.

Regarding the tracking of gender aspects in implementation, review findings show an overall increase in the proportion of projects reporting against sex-disaggregated, gender-responsive indicators or both (from

60 percent to 78 percent).<sup>10</sup> There is also a notable drop in the proportion of projects showing no evidence of reporting against gender indicators (from 20 percent to 4 percent). The 2018 policy differentiated between the two types of indicators and now requires attention to both (GEF 2017d).

Consistently over the two time periods of the review, PIRs show high levels of reporting on gender (~90 percent), though, similar to the patterns evident under the Policy on Stakeholder Engagement, reporting is not necessarily referenced to the gender action plan. There were very few terminal evaluations (n=8) in the analysis (and all from the earlier period), but the majority provide commentary on gender aspects.

Finally, on the resourcing activities to address gender disparities, the portfolio review found evidence of such in a larger proportion of projects post policy update than was evident prior to the update (up from 71 percent to 89 percent).

## 8.6 Summary

- The updated Gender Equality Policy and actions to support its implementation reflect all three recommendations from the previous IEO evaluation.
- The policy reflects overall alignment with international best practice and moves the GEF decidedly from a gender-aware, “do no harm” approach to a gender-responsive, “do good” approach.
- Gender policy guidance and action plans were released and approved as the Policy came into

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<sup>6</sup>Stakeholder consultations include individuals or groups with a gender perspective, for example, ministries of women, NGOs focused on promoting gender equality, women’s rights, or the empowerment of women.

<sup>7</sup>On this variable, there was an inordinately large percentage of projects in the sample (~60 percent) without any information to show inclusion or not.

<sup>8</sup>See previous explanation of how the IEO coded gender analysis.

<sup>9</sup>The definition of a gender action plan, as described in the Policy on Gender Equality, was followed to assess compliance with this requirement. The portfolio review team looked for documentation that provided for specific gender-responsive measures to address differences and identify impacts, risks and opportunities. The portfolio review team made a determination on the existence of a gender action plan or equivalent when actions or activities for the purposes mentioned above were soundly described either in a specific “gender action plan” document or in sections of other relevant project documents.

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<sup>10</sup>Note that sex-disaggregated indicators report data separately on men and women and may also differentiate beneficiaries by other categories (like age or ethnic subgroups). Gender-responsive indicators show progress toward achieving gender equality or the empowerment of women and go beyond the disaggregation of beneficiaries by sex.

effect in July 2018. A Gender Implementation Strategy (June 2018) situated the content of the policy in a broader understanding of gender gaps, particularly those pertinent to the GEF-7 program, and identified entry points within the program to promote gender equality and women's empowerment.

- Since 2018, the GEF has augmented its in-house capacity to deliver on the policy. This has included an increase in staff resources and the development of financing, internal guidance, and training, etc.
- Policy-related orientations and trainings in the partnership are generally well received though, similar to the situation with the Stakeholder Engagement Policy, these sessions remain at a general level, and attendance is variable.
- The GEF/UNDP/SGP/United Nations Institute for Training and Research/UN CC:LEARN Open Online Course on Gender and Environment stands out as the GEF's only online training to support the policies covered by this evaluation, making it a resource of interest as consideration is given to ways the GEF can continue to support inclusionary practices across the partnership.
- Moderated by the Secretariat, the GEF Gender Partnership has emerged as a strong knowledge sharing, knowledge exchange, and capacity development forum among GEF Agencies and gender focal points in the conventions that GEF serves. Meetings are held on a regular basis to share ongoing gender-focused work. The replicability potential of the GGP model across other policies is considerable according to those familiar with it.
- Portfolio documents show increased attention to gender equality with the introduction of the updated policy—more stakeholder consultations involving individuals or groups with a gender perspective; more frequent use of a gender analysis methodology and formulation of a gender action plan; higher utilization of the combination of gender disaggregated and gender specific indicators; increased reporting on gender in PIRs; and greater prevalence of resource allocations to support gender training and knowledge management.
- Gaps in alignment with best practices are observed by Agency key informants in the following areas: on the definition of the gender focal point role, on the assignment of budget resources at the corporate level to support the policy, and on the tracking of financial data as a way to assess commitment to the policy.
- Observed constraints in implementation for Agencies include: uneven patterns of gender data collection across the Agencies thereby hampering analysis, internal Agency-level challenges bringing staff on side with gender equality concepts, and country-level factors warding against recognition of gender equality as factors bearing on the global environment.



# Approach paper

*This annex has been lightly edited for style and consistency. Its original annexes have been appended to this final evaluation report and the references updated accordingly.*

## A.1 Background and context

### INTRODUCTION

1. Since inception, the GEF has been explicit about the importance of involving stakeholders, initially described as “the public,” in GEF-financed interventions. This is stated in the original GEF Instrument and reflected in a series of policies, guidance, and strategies that have evolved over time to ensure that GEF Agencies are applying a uniform approach inclusive of a diverse set of stakeholders across the GEF Partnership. The initial focus of engagement centered on information disclosure, and consultation and participation around GEF-financed activities. Since then, the approach has evolved from a focus on risk mitigation—i.e. “do no harm,” to language that speaks to inclusion and participation in recognition that this can lead to better development results—i.e. “do good.”

2. This evaluation focuses on three policies at the GEF—the Stakeholder Engagement Policy, the Gender Equality Policy, and the Policy on Environmental and Social Safeguards. The common thread between these policies is that they address the people part of the human-environment nexus that is commonly referenced at the GEF and in the broader development community. The underlying issues addressed by these policies (empowerment of women, inclusivity and stakeholder engagement, and safeguarding against risks) have received increasing attention over the past decade within the GEF. With the aim of ensuring engagement, inclusion, and avoidance of harm to people the environment, these policies set forth: (1) a number of minimum standards for the GEF Agencies, requiring that they demonstrate the necessary policies, procedures, system, and capacity to meet these standards and (2) a number of minimum requirements for all GEF-financed activities.

3. For all three policies, the evaluation will assess: the internal and external coherence of these policies, the consistency between them, and their alignment with GEF strategy; and their operational relevance including the level of buy-in across the partnership and support for implementation. Because the Stakeholder Engagement Policy

has never been evaluated by IEO, the evaluation will also do a 'deep dive' on the effectiveness and impact of this policy, asking whether there is any evidence of improved outcomes associated with more stakeholder engagement at the project/program level, and whether this has changed over time.<sup>1</sup>

## BACKGROUND

4. The GEF relies on engagement and interaction among its stakeholders to deliver global environmental benefits. Policies, guidelines, and strategies have evolved over time to support, encourage, and in some cases mandate engagement with stakeholders across the Partnership. The current definition of a 'stakeholder' from the GEF Stakeholder Engagement Policy is "...an individual or group that has an interest in the outcome of a GEF-financed activity or is likely to be affected by it, such as local communities, Indigenous Peoples, civil society organizations, and private sector entities, comprising women, men, girls and boys."<sup>2</sup> This definition includes the stakeholders outside the partnership, but equally relevant are the internal stakeholders at the GEF: Council, Secretariat, STAP, the IEO, international environmental convention staff, Operational and Convention Focal Points,

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<sup>1</sup> Previous IEO evaluations looked at the effectiveness of the previous Safeguards and Gender Equality policies, the current evaluation will build off and follow up on previous evaluations but will not do a 'deep dive' of the portfolio to examine effectiveness or impact for these two policies.

<sup>2</sup>This is the definition from the 2017 Stakeholder Engagement Policy, the Guidelines expand upon this definition, adding: "They can include, among others, relevant ministries, local governments, and locally-affected people, national and local NGOs [nongovernmental organizations], community-based organizations (CBOs), Indigenous Peoples organizations, women's groups, private sector companies, farmers, and research institutions, and all major groups identified, for example, in Agenda 21 of the 1992 Rio Earth Summit and many times again since then."

the Civil Society Network and the Indigenous Peoples Advisory Group.

5. The GEF Instrument reflects the importance of public participation, stating that "GEF Operational Policies...shall provide for full disclosure of all non-confidential information, and consultation with, and participation as appropriate of, major groups and local communities through the project cycle" (GEF 2019b, 8).

6. The Public Involvement Policy (PIP) (GEF 1996) was approved by the GEF Council in 1996 at the 7th Council Meeting. The policy included a rationale for public involvement, describing it as critical to the success of GEF-financed projects.<sup>3</sup> The policy mentions both women and indigenous peoples (as disadvantaged populations) as part of a definition of stakeholder participation. The PIP remained in place for close to 20 years with reviews of its efficacy carried out in starting in 2014, as described in the following section. During the intervening time period, policies and guidance for safeguards, gender, information disclosure, monitoring and evaluation, and other topics build on and refer to this foundational document.

7. The GEF Partnership expanded in 2010, after a decision by the 39th Council to broaden the partnership through the accreditation of GEF Project Agencies. As the Partnership grew there was a need to ensure that all GEF Agencies were consistent in their policies and approaches for GEF-financed activities, including, inter alia, measures for safeguarding against environmental and

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<sup>3</sup> According to the policy rationale, this was to occur through four mechanisms: (1) enhancing country ownership of an accountability for, project outcomes; b) addressing social and economic needs of affected people; (3) building partnerships among project executing agencies and stakeholders; (4) making use of local skills experience and knowledge.

social risks, ensuring adequate attention to gender and sufficient stakeholder engagement.<sup>4</sup>

## STAKEHOLDER ENGAGEMENT

8. After the 1996 Public Involvement Policy was issued, 18 years passed before the corresponding guidelines were published. In 2013–14 the GEF-CSO Network conducted a review of the Public Involvement Policy and issued a report to Council in 2014 (GEF-CSO Network 2014). In addition, IEO conducted a substudy on CSO Engagement in the GEF as part of OPS5 (GEF IEO 2013a). Recommendations from both documents are reflected in the Guidelines for the Implementation of the Public Involvement Policy (GEF 2014b) which was presented as an information paper to the 47th Council Meeting in October 2014. The guidelines provide detail on steps to achieve and implement the principles stipulated in the policy. They reference the Fourth High-Level Forum on Aid Effectiveness in Busan, highlighting the importance of country ownership for GEF-financed projects.

9. In 2014 the GEF 2020 Strategy was approved and included “mobilizing local and global stakeholders” as a core operational principle (GEF 2015). The strategy describes roles and responsibilities for national and local governments, the private sector, and civil society stakeholders and highlighted cross country partnerships and dialogue processes as critical processes. There is an emphasis on stronger engagement with CSOs and indigenous peoples to develop knowledge and mobilize public action leading to increase effectiveness of GEF-financed activities. Gender mainstreaming and women’s empowerment are also highlighted.

10. In 2015 the Working Group on Public Involvement was established to review and update the

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<sup>4</sup> In December 2019 a compliance assessment was presented to Council (GEF 2019d).

Public Involvement Policy with a view to achieving more effective stakeholder engagement in GEF operations. The Working Group, led and facilitated by the GEF Secretariat, presented to Council a series of recommendations to update the Public Involvement Policy at the 51st Council meeting, after a 2-year participatory and consultative process.<sup>5,6</sup>

11. The GEF Policy on Stakeholder Engagement (GEF 2017a) establishes mandatory requirements for stakeholder engagement that apply to all projects, irrespective of their level of social or environmental risks. The policy was approved by the Council in 2017 and came into effect on July 1, 2018, for new-GEF financed activities. For activities under implementation the policy became effective on July 1, 2019. The new policy differed from the Public Involvement Policy in the following ways:

- It was written exclusively in mandatory language, providing clarity for application and accountability;
- Clear minimum requirements were identified for Agencies, with an emphasis on using Agency systems. These new minimum requirements build on and complement those already established through safeguards and fiduciary standards;

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<sup>5</sup> The Working Group included representatives of the GEF Secretariat, the CSO network, the Council, GEF Partner Agencies, the GEF Indigenous People’s Advisory Group, the IEO and GEF Operational Focal Points.

<sup>6</sup> An associated Council Document had more specific recommendations which included the following: (1) Policy requirements regarding stakeholder engagement should apply to ALL projects; (2) Require development of stakeholder engagement plans; (3) Ensure stakeholders have access to full project information at the Agency-level; (4) Revise GEF’s templates, review and tracking systems for stakeholder engagement in GEF project development and approval (5) Strengthen GEF Secretariat access to information policies and practices; and (6) Develop a plan for revising GEF’s Public Involvement Policy.

- Clear requirements were established for project and program level monitoring and reporting by Agencies, and portfolio-level monitoring and reporting by the Secretariat;
- Specific, mandatory documentation requirements were set out for the project cycle, including a stakeholder engagement plan or equivalent at the CEO endorsement/approval stage.

12. The Policy sets out mandatory requirements in three areas: a) project and program cycles; b) activities led by the Secretariat; and c) Agency policies, procedures and capabilities.

13. The Guidelines on the Implementation of the Policy on Stakeholder Engagement were issued in December 2018 (GEF 2018a). This document provides information on how Agencies and the Secretariat should identify and adopt practical approaches to achieve the principles set forth in the Policy. Specific guidance is provided on the following: meaningful consultation (including key elements); effective and inclusive engagement; incorporating local knowledge and viewpoints; ensuring gender equality and women's empowerment (with reference to the Gender guidance); culturally appropriate consultations and Free Prior and Informed Consent (with reference to the Safeguards policy); access to information; and meetings and multi stakeholder dialogues. Detailed guidance on mandatory requirements at each stage of the GEF project cycle, including stakeholder engagement plans, is also provided.

## GENDER

14. The Policy on Gender Mainstreaming was approved by the Council at the 40th Council Meeting in May 2011 (GEF 2011b). The Policy was initially adopted as an annex of the GEF Policies on Environmental and Social Safeguards Standards and

Gender Mainstreaming but was later issued as a stand-alone policy.

15. IEO conducted a substudy on the GEF's Policy on Gender Mainstreaming (GEF IEO 2013b). Some of the recommendations from this substudy were reflected in the Gender Equality Action Plan (GEAP) (GEF 2014a), approved at the 47th GEF Council in October 2014. The GEAP covered the fiscal year period 2015–18 and aimed to operationalize the Policy on Gender Mainstreaming, including a workplan with concrete steps and key actions and outputs addressing five key elements: project cycle; programming and policies; knowledge management; results-based management; and capacity development. To implement the activities under the GEAP, a GEF Gender Partnership was established, and remains active to date. The GEAP called for a review and, as necessary, an update of the Policy on Gender Mainstreaming by July 2018.

16. In 2017 the IEO presented its Evaluation of Gender Mainstreaming in the GEF to Council (GEF IEO 2018b). This evaluation recommended revising the Gender Mainstreaming Policy, developing an action plan for implementing the policy during GEF-7, and ensuring adequate resources are made available for gender mainstreaming activities.

17. An updated Policy on Gender Equality (GEF 2017b) was approved by the 53rd GEF Council in November 2017. The policy effectiveness date for new activities was July 1, 2018, and July 1, 2019, for activities under implementation. The updated policy refers to increased attention to gender by the conferences of the parties to the multilateral environmental agreements as well as the Sustainable Development Goals. The Policy explicitly recognizes "GEF's ambition to better seize the strategic opportunities to address gender inequality and support women's empowerment where these can help achieve global environmental benefits." There is a marked shift from a risk



mitigation approach to a proactive gender responsive approach. Changes to the policy include:

- Clarification of GEF's approach to mainstream gender and promote gender equality and the empowerment of women;
- Formalization and clarification about GEF requirements for addresses gender equality in GEF-financed activities; and
- Introduction of a clearer focus on results, including requirements for project and program-level monitoring and reporting on gender by Agencies, and portfolio-level monitoring and reporting on performance and results by the Secretariat.

18. The Gender Implementation Strategy (GEF 2018b) was approved at the following Council Meeting in June 2018. The Strategy describes three specific inequalities and gaps that are relevant to GEF's work, namely: inequitable access to and control of natural resources; unequal opportunities in environmental decision-making and leadership; and uneven access to socio-economic benefits and services. Strategic entry points to address these gaps for GEF-7 are identified in the strategy and so are priority action areas, including:

- Gender-responsive approaches and results are systematically promoted in GEF programs and projects;
- Strengthened capacity of GEF's Secretariat and its partners to mainstream gender and seize strategic entry points to promote gender equality and women's empowerment;
- GEF's connection with partners to generate knowledge and contribute to learning on links between gender and the environment are improved; and
- GEF's corporate systems for tracking and reporting on gender equality results are enhanced.
- The Strategy also includes roles and responsibilities for implementing the Policy on Gender

Equality and the Strategy for the GEF Council and the Secretariat. Finally, the Strategy presents a GEF-7 Results Framework on Gender Equality and Women's Empowerment with indicators, baseline data (if available), and verification methods for two outcome areas: Gender-responsive GEF program and project design and development and Gender-responsive program and project reporting and results.

## SAFEGUARDS

19. The GEF Policy on Agency Minimum Standards on Environmental and Social Safeguards (GEF 2011a) was approved in November 2011 at the 41st Council Meeting. The provisions for the GEF Minimum Standards were established in the guideline document Application of Policy on Agency Minimum Standards on Environmental and Social Safeguards. The GEF Minimum Standards had the objective of preventing and mitigating any unintended negative impacts to people and the environment that might arise through GEF operations. According to the policy, the new minimum standards used the approach and criteria contained in the World Bank's safeguards policy<sup>7</sup> and describes itself as building on the GEF's Public Involvement Policy. There were seven GEF Safeguard Standards approved in 2011: Environmental and Social Assessments; Natural Habitats; Involuntary Resettlement; Indigenous Peoples; Pest Management; Physical Cultural Resources; Safety of Dams.

20. In 2017, the IEO presented its Review of the GEF Policy on Agency Minimum Standards on Environmental and Social Safeguards (GEF IEO 2018c). The Review identified a range of gaps in thematic coverage of GEF Safeguards that appeared germane

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<sup>7</sup> Operational Policy 4.00: Piloting the Use of Borrower Systems to Address Environmental and Social Safeguard Issues in Bank Supported Projects

for the risks present in the GEF portfolio. Consequently, one of the recommendations of the evaluation was to review and potentially update the GEF Safeguards policy. Another finding from the evaluation was the GEF Agencies would welcome increased opportunities for knowledge sharing and capacity building regarding challenges in addressing safeguards issues, leading to the recommendation for support to capacity development, experiment convening and communications regarding safeguards. Finally, the evaluation recommended improvements in how the GEF tracks and reports on social and environmental risks at the portfolio level, ensuring a flow-through of monitoring information on the implementation of safeguards.

21. The 55th GEF Council approved an updated Policy on Environmental and Social Safeguards (GEF 2018c) in December 2018. The policy effectiveness date was July 1, 2019, for new activities and for ongoing activities the policy will be effective on July 1, 2020. The updated policy reflected specific recommendations from the IEO Review, and from the IEO Evaluation of GEF Support to Indigenous Peoples. Guidelines for the Policy (GEF 2019a) were presented as an information document to Council in December 2019.

22. The updated policy focuses on minimum standards for Agency policies, procedures, systems and capabilities, and outlines a process for monitoring compliance (see GEF 2019d). The policy sets out minimum standards in nine areas including: labor and working conditions; community health, safety, and security; climate and disaster risks; disability inclusion; disadvantaged or vulnerable individuals or groups; and adverse gender-related impacts, including gender-based violence and sexual exploitation and abuse. The policy strengthens protections for indigenous peoples, requiring Agencies to ensure that free, prior and informed consent (FPIC) of affected Indigenous peoples is obtained under certain conditions. It also adds

new requirements for documenting and reporting on environmental and social risks and potential impacts, and their management, and roles and responsibilities for Agencies and the Secretariat.

## PREVIOUS EVALUATIONS

### Stakeholder engagement

23. This is the first IEO evaluation to on the Stakeholder Engagement Policy, however there are IEO evaluations that cover engagement with specific groups (see [appendix 2](#)). Due to the cross-cutting nature of this topic it is likely that there are relevant findings across the portfolio of IEO evaluations, these will be explored.

24. In February 2020 the Climate Investment Fund published an independent evaluation on local stakeholder engagement in the Climate Investment Funds (CBI 2020). The CIF evaluation focused on three learning questions about local stakeholder engagement: (1) How was local stakeholder engagement envisioned in the CIF's design?; (2) How has it been implemented in each of these areas of CIF's work (governance, investment planning, project design and implementation and program monitoring and evaluation)?; (3) What lessons can the CIF and other climate investment funds and their stakeholders learn from the CIF's experiences with local stakeholder engagement? There were several findings that are salient for the planned IEO evaluation. The CIF evaluation found variation in effectiveness of local stakeholder engagement during investment planning, identifying factors that led to more effective engagement such as existing institutions and norms, and processes that built on effective stakeholder engagement in country forums. In terms of project design and implementation, the CIF evaluation found that local stakeholders have benefited from their engagement in CIF projects through enhanced individual and community capacities, improved livelihoods and market opportunities

and greater energy access, with the caveat that evidence is preliminary. The findings from this evaluation, especially the third learning question, can be used to help the evaluation team shape criteria to use when assessment engagement in GEF-financed interventions.

25. In 2018, the Washington, DC's Independent Evaluation Group conducted an evaluation of citizen engagement at the World Bank Group (IEG 2018). This evaluation describes the long history of citizen engagement at the World Bank Group, noting that the concept of "engagement" evolved from risk management (with the introduction of environmental and social safeguards) to proactive engagement in projects, policies, and strategies. The evaluation assessed the extent to which citizen engagement activities incorporate four quality principles: aiming for results, closing the feedback loop, ensuring inclusion, and building citizens' and government's capacity to engage. Findings included, inter alia, the following: there was awareness and buy-in of the citizen engagement agenda among senior management and staff; the number of projects with a citizen oriented design and citizen engagement indicators had increased but the applications of quality standards in the design, implementation and monitoring, has been limited that aspects related to quality of engagement are given insufficient attention at design and monitoring stages; and indicators rarely tracked results, and reporting was insufficient; the insufficient attention to quality and an emphasis on tools rather than results risks undermining the objective to mainstream citizen engagement to improve development outcomes; and more focus on capacity building and learning is warranted. A number of these findings are relevant for the current evaluation and have been reflected in the evaluation questions. These include: the extent to which there is buy-in for the policies; the quality standards used during the review process; the extent to which indicators used to track progress are adequate; and an examination

of capacity development to support implementation of the policies.

## Gender

26. As part of OPS5, IEO commissioned a substudy on GEF's Policy on Gender Mainstreaming in 2013 (GEF IEO 2013b). This substudy assessed trends in gender mainstreaming as well as implementation progress and appropriateness of the policy. Building on this substudy, the IEO undertook an Evaluation of Gender Mainstreaming in the GEF for OPS6 and presented to the Council in May 2017. The evaluation covered three areas: (1) the extent to which the Policy had been implemented by means of the GEAP; the appropriateness of the policy for the GEF and its implementation in line with international best practices; and the trends of gender mainstreaming in the GEF since OPS5.

27. Main findings of the evaluation included the following:

- According to the 2017 IEO Evaluation, trends in gender mainstreaming in the GEF showed modest improvement over the previous OPS period (OPS5).
- Very few projects conducted gender analyses despite it being one of the minimum requirements of the Policy on Gender Mainstreaming. For a cohort of projects from OPS6, only 13.9 percent of medium-size projects and full-size projects in a quality at entry review and 15.7 percent of completed projects had done a gender analysis prior to CEO endorsement/approval. Those projects that did conduct a gender analysis achieved higher gender ratings.
- The Policy on Gender Mainstreaming increased attention to and performance of gender in GEF operations, but there was a lack of clarity around its framework and certain provisions and implementation. The 2017 evaluation found that the policy left too much room for interpretation on gender analysis and on the responsibilities of

the GEF Agencies vis-à-vis the GEF Secretariat regarding its implementation.

- Institutional capacity to implement the policy and achieve gender mainstreaming was found to be insufficient within the GEF Secretariat.
- The 2017 evaluation found that the Gender Equality Action Plan has been a relevant and effective framework for implementing the Policy on Gender Mainstreaming. The GEAP facilitated implementation, annual reports provided by the Secretariat were seen as useful and the evaluation emphasized that a strong action plan facilitates strategic priority setting and can promote the agenda on gender mainstreaming.

## Safeguards

28. In response to a Council request, IEO conducted a Review of the GEF Policy on Agency Minimum Standards on Environmental and Social Safeguards (GEF IEO 2018c). This evaluation focused on four questions: (1) The extent to which the GEF Safeguards have added value to the GEF Partnership; (2) The degree to which they are aligned with relevant international best standards and practices; (3) How the GEF is informed of safeguard related risks in supported operations; (4) Recommendations on how the GEF Safeguards might evolve in coming years. The review found that the GEF Safeguards served as an important catalyst to strengthen policies among some GEF Agencies, however there was a range of environmental and social risks in the portfolio. The evaluation recommended a review of the GEF safeguards, improvements to the tracking systems in place for monitoring and reporting on safeguards, and support for capacity development, expert convening, and communications.

## A.2 Purpose, objectives, and audience

### PURPOSE

29. The purpose of this evaluation is to provide evidence on the relevance and application of three GEF policies that promote inclusivity, engagement, and avoidance of undue harm to stakeholders: the Stakeholder Engagement Policy; the Gender Equality Policy; and the GEF Policy on Agency Minimum Standards on Environmental and Social Safeguards. The evaluation will also look for evidence linking the Stakeholder Engagement Policy with project and program outcomes.

### OBJECTIVES

30. The objective of the evaluation is to assess the coherence, operational relevance and implementation of the following GEF policies: The Stakeholder Engagement Policy, the Gender Equality Policy, and the Policy on Environmental and Social Safeguards. The evaluation will include an in-depth analysis of stakeholder engagement at the GEF since GEF-5. The analysis of stakeholder engagement will look at changes over time in GEF-financed activities, as well as any evidence on outcomes associated with stakeholder engagement.

### AUDIENCE AND STAKEHOLDERS

31. The primary audience for this evaluation is the GEF Council, the GEF Secretariat, and the GEF Agencies. Other important stakeholders include the executing agencies, operational focal points (OFPs), country governments, the Civil Society Network, the Indigenous Peoples Advisory Group, other environmental funds (for example the Adaptation Fund, CIF, GCF), staff at international environmental conventions, civil society organizations, and community members affected by GEF-financed interventions.

32. In line with IEO's standard approach, the evaluation will form a Reference Group, composed of representatives from the GEF Secretariat, GEF Agencies (including UN agencies and an NGO agency), and civil society representatives. The Reference Group will: (i) provide feedback and comments on the preliminary findings and the evaluation report; (ii) help ensuring evaluation relevance to ongoing as well as future operations; (iii) help identifying and establishing contact with the appropriate individuals for interviews/focus groups; and iv) facilitate access to information.

## A.3 Evaluation questions and coverage

### KEY EVALUATION QUESTIONS<sup>8</sup>

- **Coherence/strategic alignment:** To what extent is there strategic alignment and consistency between the Stakeholder Engagement, Gender Equality and Safeguards policies?
- **Operational relevance:** To what extent is there buy-in across the Partnership and support for implementing these policies?
- **Effectiveness:** To what extent do GEF supported activities promote inclusive and meaningful stakeholder participation in GEF governance and operations? To what extent are the updated policies (Stakeholder Engagement, Gender Equality, and Safeguards) being applied to new GEF-financed activities and are there any lessons from early implementation of these policies?
- **Impact:** To what extent is there evidence linking stakeholder engagement with project and program impacts?

33. This program of work will build upon and provide updates to two previous IEO evaluations that

<sup>8</sup> See [annex B](#) for the evaluation design matrix.

assessed engagement with and support to specific stakeholder groups. The evaluation will assess the extent to which the recommendations from the Evaluation of the GEF–Civil Society Organization Network (GEF IEO 2016) and the Evaluation of GEF Engagement with Indigenous Peoples (GEF IEO 2018b) have been taken up, with an emphasis on recommendations that relate to how the GEF supports meaningful and inclusive with these stakeholder groups. [Appendix 2](#) has more information about these evaluations.

### COVERAGE

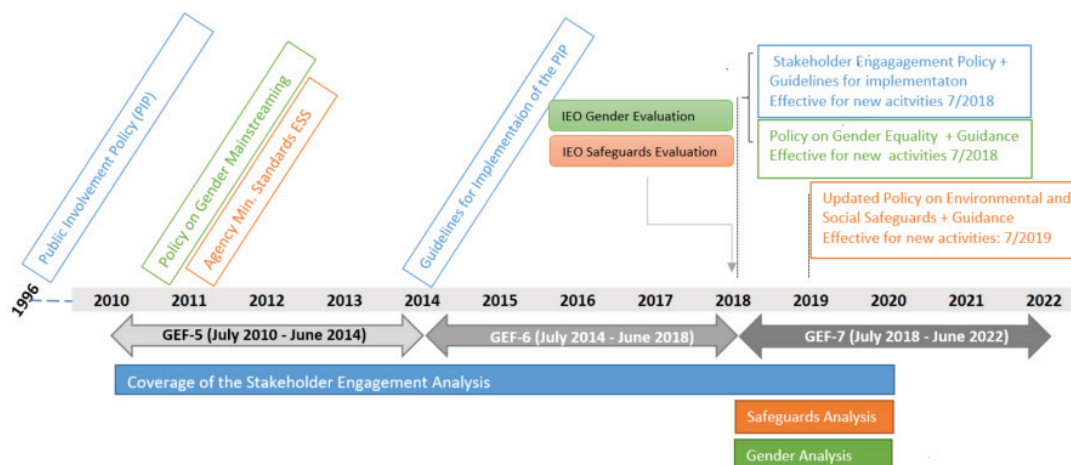
34. The timeline covered by this evaluation for the 'deep dive' on stakeholder engagement includes interventions financed under GEF-5, starting in July 2010 through those approved before July 1, 2020. The focus will be on medium-size projects, full-size projects, enabling activities, and programs. The coverage for the updated Gender Equality and Safeguards Policy will cover the time period since the respective IEO evaluations, which generally coincides with the issuance of the new policies. [Figure A.1](#) shows the key milestones for these policies, relative to the GEF periods.

35. The GEF Small Grants Programme is an important financing mechanism for Indigenous Peoples and CSOs, however because it is the subject of a separate IEO evaluation it falls outside the scope of this work.<sup>9</sup> The Country Support Program is a key mechanism for engagement at the country and regional level, this is also the subject of a planned IEO evaluation and therefore falls outside of the scope of this work.<sup>10</sup> Findings from both of these planned evaluations will be incorporated into the final report. Also relevant is the evaluation

<sup>9</sup> The approach paper and associated information is available on the GEF IEO [Third Joint GEF-UNDP Evaluation of the SGP](#) webpage.

<sup>10</sup> The approach paper for this evaluation is forthcoming.

**Figure A.1** Key milestones and evaluation coverage



of Impact Programs. Complementarities will be sought with both the Country Support Program evaluation and the SGP evaluation, and relevant findings will be incorporated but these topics will not be a focus of this evaluation. A case study on stakeholder engagement in the Impact Programs is planned.

## A.4 Evaluation design, quality assurance, and limitations

### EVALUATION DESIGN

36. The evaluation will use a mixed methods approach, and is expected to include the following elements:

- **Document and literature review:** To answer questions about coherence and strategic relevance, the evaluation team will review council documents, GEF policies, guidance, and strategies as well as policies, guidance and strategies from other climate finance mechanisms. Project/program documents (especially at the PIF/PDF approval and CEO endorsement phase),

terminal evaluation reports, and document templates will be reviewed to answer questions about effectiveness and impact. The Implementation Modules in the GEF Portal will be reviewed as a key source of monitoring and reporting data for GEF Secretariat.

- **Benchmarking exercise:** The three policies will be reviewed and compared with similar policies at other development organizations and with other climate finance institutions. This assessment will help answer the evaluation questions on strategic relevance of GEF policies and coherence with best practice and approaches used by the broader development community.
- **Interviews/focus group discussions and stakeholder workshops:** This evaluation will rely heavily on feedback from stakeholders across the partnership. Interactions will take place with staff and volunteers from the following stakeholder groups: GEF Council; GEF Secretariat; GEF Agencies; executing agencies; GEF Focal Points; the Indigenous Peoples Advisory Group; the GEF SGP; the GEF Gender Partnership; the GEF-CSO Network; Focal convention staff; and project level stakeholders including local communities and direct project beneficiaries. Input

from these stakeholders will be used to answer questions about operational relevance, effectiveness of the application of policies, and the impact of the policies on GEF-financed interventions.

- **Online surveys:** An online survey will be conducted with different modules targeted at specific stakeholder groups (Operational Focal Points, Council Members, CSO Network, CSO members, Agency staff).<sup>11</sup> The evaluation team will coordinate survey efforts with other IEO evaluations to ensure efficiency and avoid over taxing respondents. Perceptions from stakeholders are an important input that will be used across the evaluation.
- **Stakeholder mapping exercise:** The GEF Partnership is a complex entity, comprised of 183 countries, 18 Agencies, civil society organizations, indigenous peoples and the private sector. The evaluation will conduct a stakeholder mapping exercise which looks at the needs/yields for each actor relative to the implementation of the policies. This will be used as a tool to better understand how the GEF functions relative to the policies, and as a starting point for interviews with stakeholders. This tool will allow the evaluation team to refine and hone interview and survey questions and could provide information relevant to the portfolio review.
- **Theory of change exercise:** Using the Stakeholder Engagement Policy, the evaluation will conduct a theory of change exercise, mapping out the activities, outcomes and impact as described in the policy documents. Upon validation with the GEF Secretariat, this will be used as

a means to frame evaluation subquestions and inform instrument design.

- **Field visits:** If possible, the evaluation will carry out field visits to project sites to conduct interviews with project stakeholders to gain an in-depth understanding of whether these policies, when applied holistically, have intended or unintended impacts. The selection of countries and intervention types will be informed by the portfolio analysis, network analysis, and stakeholder interviews and be guided by the following criterion (in addition to current status regarding the COVID-19 pandemic): GEF Agency, type of executing agency, geographical distribution, and GEF focal area.
- **Portfolio analysis:** The evaluation will conduct a portfolio review based on data from PMIS and the GEF Portal. An in-depth review of stakeholder engagement from July 2010 to the present (including a quality at entry review for activities subject to the new policy) will include projects from GEF-5, GEF-6, and GEF-7. A review of recently approved activities that are subject to the updated gender and safeguards policies will also be conducted. A database will be compiled including basic project information such as GEF activity cycle information, financing (including cofinancing), implementing institutions involved, focal areas, countries, main objectives, key partners, and implementation status. A project review template will be developed to assess the programs in a systematic to ensure that key evaluation questions are addressed coherently and allow for aggregation. Using the review template, the evaluation team will rate projects along criteria related to application of the policies and look for any relationship between these ratings and project performance (as reflected in terminal evaluation ratings). A sample of projects will be selected to ensure coverage of the following criteria: i) Agency, ii) type of project

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<sup>11</sup> One challenge will be identifying names of CSOs that have been involved at the project level, as there is currently no database that exists with this information. There are two approaches that could be considered to generate this information: (1) An email to Agencies asking for CSO contacts and (2) extracting this information during a portfolio review.

(full-size project, medium-size project),<sup>12</sup> while also ensuring broad coverage of executing agency type, geographic distribution, and GEF focal area. Portfolio composition and considerations are discussed in [appendix 1](#).

## QUALITY ASSURANCE

37. In line with IEO's quality assurance practice the evaluation secured two Peer Reviewers, one internal and one external. Internal IEO review will be provided by a Senior Evaluation Officer (Carlo Carugi). Chris Nelson, Manager, World Bank Independent Evaluation Group is the external Peer Reviewer. The role of the Peer Reviewers is to advise throughout the evaluation process on: (i) the soundness of evaluation design, scope, questions, methods and process described in the approach paper; and (ii) implementation of the methodology and implications of methodological limitations in the formulation of the conclusions and recommendations in the draft and final reports. On March 19, 2020, Mr. Carugi and Mr. Nelson provided multiple insights into the scope, evaluation questions, and methods during a review meeting with IEO staff. These inputs have been incorporated into this approach paper. This approach paper was circulated to the GEF Secretariat and all comments have been addressed and posted in an audit trail on the IEO website.

38. Triangulation of the qualitative and quantitative information gathered will be conducted at completion of the data analysis and gathering phase to determine trends and identify the main findings, lessons and conclusions. Stakeholders will be consulted during the process to test preliminary findings. The approach paper will be circulated to the GEF Secretariat, the CSO Network,

<sup>12</sup> This evaluation will cover medium-size projects and full-size projects, there is a separate evaluation of enabling activities planned.

the Indigenous Peoples Advisory Group, and implementing Agencies and the evaluation report will be shared with the same stakeholders plus relevant executing agencies and other stakeholders consulted for the evaluation. In addition, the evaluation team met with the Secretariat for an initial meeting on evaluation ideas and will continue to request feedback on evaluation design, theories of change, and other issues/ideas that arise.

## LIMITATIONS

39. The first draft of this Approach Paper was completed in late February 2020, in the intervening time period the COVID-19 pandemic has emerged as a major global challenge. Like other independent evaluation organizations, IEO has thought extensively about the adjustments that need to be made to ensure that strategically important evaluation work continues (including our commitment to deliver OPS 7), while ensuring both quality and credibility of the work and that we act in an ethical manner. A framework described by the World Bank's Independent Evaluation Group in a recent blog closely aligns with the approach discussed at IEO and therefore is presented here alongside the responses related to the planned evaluation. The framework focuses on four questions addressing ethical, conceptual and methodological challenges associated with the pandemic and includes with recommended actions aligned with how one responds to the questions (Raimondo, Vaessen, and Branco, 2020). The four questions and the responses for this evaluation are included in [table A.1](#).

40. Beyond the challenges associated with conducting an evaluation during a global pandemic, there are a few additional limitations. For the recently updated policies, the portfolio of projects approved or under implementation is small, and there are no completed projects. This limits the ability to look at higher order impacts of the new



**Table A.1**

<p>1) Should you adapt your evaluation questions and scope?</p>	<p>In answering this question, IEO determined that the target audience (Council and GEF Secretariat) are likely to listen and act on the findings, especially as we approach the next replenishment process. The Stakeholder Engagement Policy and related activities are well defined, and coherent enough to allow for evaluation at the present time. The only area of concern under this question is about the likelihood of having well substantiated evaluation findings. This concern relates to whether country and on the ground stakeholders will be accessible and is addressed in the next section.</p>
<p>2) Can you improve what remains feasible?</p>	<p>Most of the planned evaluation work is still feasible. The ability to conduct a rigorous portfolio review is not impacted by the pandemic, it is a central component in this evaluation. The evaluation team will explore other desk-based methods to supplement the portfolio review. These might include content analysis using a theory-based approach (in a consultative manner with GEF Secretariat and other stakeholders) and conducting a stakeholder mapping exercise that carefully examines the needs/yields relationship between each stakeholder group through the lens of the Stakeholder Engagement Policy and associated activities.</p> <p>This evaluation covers many stakeholders at the GEF that are currently accessible via virtual communication. Preliminary discussions with GEF Secretariat counterparts indicate that the evaluation team can (virtually) access most of the key stakeholders including: GEF Council; GEF Secretariat; GEF Agencies; executing agencies; GEF Focal Points; the Indigenous Peoples Advisory Group; the GEF Small Grants Programme; the GEF Gender Partnership; the GEF-CSO Network; and Focal convention staff. The main area here where some concern is warranted is the ability to reach country level and project stakeholders who could provide valuable information about their experience engaging with GEF operations and governance. Approaches to address this concern are discussed in the next section.</p>
<p>3) Can you find ways around what is infeasible?</p>	<p>As described in the previous section, IEO was informed that many of the key informants are accessible via remote communication. The country and project level stakeholders, especially vulnerable, poor, or inaccessible communities, may not be reachable via remote communication. The situation on the ground varies from country to country and is in flux.</p> <p>The evaluation is proposing a two-phased approach. <u>Phase one</u> focuses on desk-based approaches including document review, designing and starting a rigorous portfolio review, drafting an online survey, and conducting a preliminary round of virtual stakeholder interviews and potentially focus groups. These interviews will focus on key, accessible informants to address evaluation questions, but also gather their firsthand knowledge about the current status of country and program level stakeholders. After phase one, the evaluation team would assess whether it's feasible to move forward with phase two, which could include sessions during national dialogues, and ECWs (if possible), and country case studies with field visits. The use of local consultants will be explored, but the overall priority guiding whether the country level field work moves forward is whether local or national authorities are allowing movement, and whether it is ethical to carry out the activities. Alternatives to fieldwork and in-person attendance at national dialogues or other GEF events include desk-based case studies, interviews with local implementing NGOs, online focus group discussions and additional online surveys. Any limitations associated with the inability to travel will be presented in the final evaluation report.</p>
<p>4) Can you tap into alternative sources of information?</p>	<p>The framework suggests using big data where possible. It's unclear right now whether an analysis of big data would be useful for this evaluation, however this is something to consider moving forward.</p>

policies. The evaluation will review the small portfolio that falls under the new policies to conduct a quality at entry assessment and look for compliance with the new policy requirements, however the sample size is a limitation and therefore the results from analysis of the small portfolio will be reported with this caveat.

41. Another limitation is related to the unreliability of PMIS/GEF Portal data on projects and programs, which will be addressed through cross-checking data with the Secretariat and with GEF Agencies. Finally, given the large and heterogeneous nature of the Partnership and the implementation contexts for GEF-financed interventions and assuming that field visits will be possible, another limitation is the number of field visits that can be carried out within the resource envelope (time and finances) for this evaluation. This could be mitigated, to the extent possible, by conducting field missions jointing with other evaluations or by using local consultants.

## A.5 Deliverables and dissemination

42. Preliminary evaluation findings will be drafted by December 2020. The evaluation report will be finalized by March 1, 2021, for presentation as an information document at the June 2021 GEF Council Meeting. A formatted, finalized version will appear on the GEF IEO website soon after. A four-page evaluation brief with the main messages will be published for the evaluation. The evaluation brief and the final evaluation report will be posted on the IEO website and included in the IEO newsletter. The evaluation team will make every effort to ensure that stakeholders consulted as part of this work receive the evaluation outputs or are informed of where to find the evaluations. As requested or relevant, external presentations will be given to support broader dissemination of the work.

## A.6 Resources

### TIMELINE

See [table A.2](#).

### TEAM AND SKILLS MIX

43. Kate Steingraber, Evaluation Officer, will lead the design and implementation of the evaluation with oversight from Geeta Batra, Chief Evaluation Officer. Anna Viggh, Senior Evaluation Officer, will support the review of the Gender Equality Policy. Other IEO staff will support different components of the evaluation, time permitting.

44. The evaluation team will include two expert consultants (C) who have deep knowledge of GEF policies and engagement. Phil Cox, a core team member from the previous evaluation, will work on the updates to the evaluations that cover engagement with two groups—CSO Network and Indigenous Peoples. Bruce Jenkins will lead the work on strategic alignment and coherence of the policies. IEO staff will conduct the review of the updated gender policy. A research analyst consultant (RA) will support the portfolio review and online survey data collection and analysis.

45. Additional information on engagement with country level stakeholders will come from the planned IEO evaluation of the Country Support Program evaluation. These include questions related to activities covered under the Stakeholder Engagement Policy under the category of GEF-Secretariat Led activities (National and Multi-Stakeholder Dialogues).

**Table A.2 Gantt chart of project activities**

Activity	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun
<b>Evaluation design</b>																
Approach paper																
<b>Data gathering</b>																
Document review																
Stakeholder mapping																
Interviews <sup>a</sup>																
Policy analysis																
Online surveys																
Field visits <sup>b</sup>																
Portfolio review																
<b>Deliverables</b>																
Data analysis																
Preliminary findings																
Draft report																
Review process																
4-page brief																
Final report																
Presentation to Council																

a. If possible in the context of COVID-19, interviews will be planned to take advantage of times when there are planned stakeholder gatherings—for example Council Meetings and the Agency Retreat (March). ECWs may also be used as an opportunity to conduct interviews.

b. If possible—see section on limitations for an explanation of the COVID-19 considerations.

# Appendix 1: Portfolio composition

## STAKEHOLDER ENGAGEMENT

1. The stakeholder engagement portfolio review will cover GEF-financed activities that were CEO endorsed or approved from July 1, 2010, to July 1, 2020. Covering a 10-year period allows the evaluation to look at the application of the policy at the project/program level for three cohorts:

- **2010–14:** Projects that were CEO endorsed/ approved under the 1996 Public Involvement Policy, prior to issuance of the guidelines (quality at entry and review of completed projects)
- **2014–18:** Projects subject to the 1996 Public Involvement Policy, after guidelines were issued (quality at entry and review of completed and ongoing projects)
- **2018–20:** Projects that were CEO endorsed under the updated Stakeholder Engagement Policy (quality at entry review only)<sup>1</sup>

2. The approach divides the portfolio into cohorts aligned with milestones (policy updates, issuance of guidance). These changes occurred at different points of time over the past decade, therefore the proposed portfolio review reflects this, as demonstrated in [figure A1.1](#).

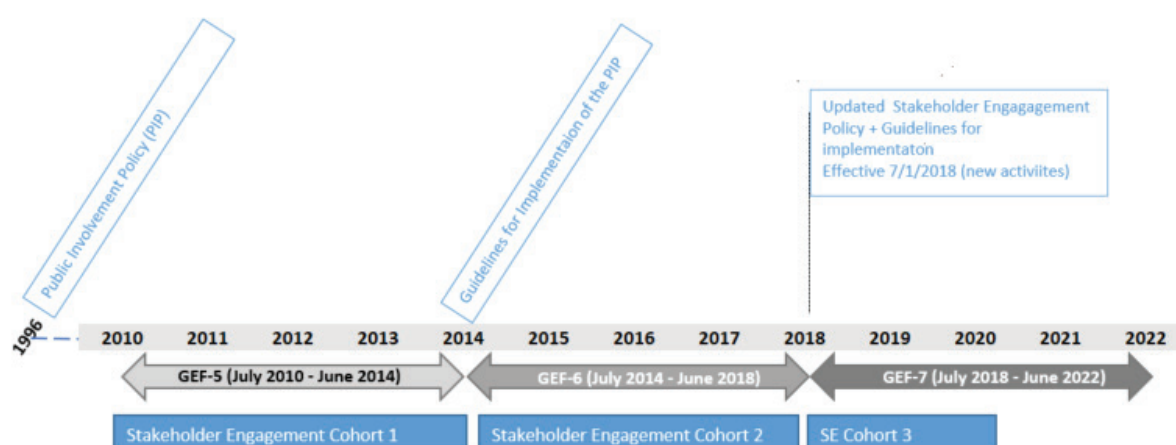
3. The Stakeholder Engagement portfolio review will have two components:

- **Quality-at-entry review.** This assessment will review documentation from a sample of projects at CEO Endorsement, this may include project framework documents (PFDs), project identification forms (PIFs) and supporting documentation (e.g. gender analysis, socioeconomic analysis or similar, safeguards documentations and any gender plan, stakeholder engagement plan or risk mitigation plan). All projects will be reviewed using a project review template to assess the interventions in a systematic manner

<sup>1</sup> The Stakeholder Engagement Policy came into effect for new activities in July 2018, and for activities under

implementation (implementation reports, midterm reviews, and terminal evaluations) in July 2019.

**Figure A1.1** Stakeholder engagement policy milestones and portfolio cohorts



to ensure that key evaluation questions are addressed coherently and that results can be aggregated. Review criteria will be set by the evaluation team after preliminary interviews and document review (some examples could include inclusiveness, level of engagement of stakeholder groups, documentation of consultations, risks identified, etc). The review template will reflect the mandatory requirements under each respective policy (which changed over time) but will also look for evidence of a more holistic application of the topics the policies address. This analysis is being carried out to assess whether the policies have changed the identification and design of GEF-financed interventions over time.

- **Review of completed/ongoing projects.** This portfolio review will look at a sample of completed and ongoing projects through a review of project documents including midterm reviews, implementation reports, and terminal evaluations. There will also be a project review template that will review closed and ongoing projects along the same criteria. This analysis will contribute to an assessment of whether the policies have changed the implementation and evaluation of GEF-financed interventions over time. Closed projects that are reviewed for quality at entry will also be assessed at closure to determine whether the planned stakeholder engagement activities were carried out and reported on.

## PORTFOLIO UNIVERSE

4. The stakeholder engagement portfolio universe is comprised of all projects that have been received by the GEF on or after 2010. The portfolio excludes Small Grants Programme and the National Portfolio Formulation Exercise (NPFE) projects, in addition to excluding any dropped/withdrawn/rejected projects. The portfolio was narrowed down further to include only medium and full-sized

projects that have been CEO endorsed or approved, under implementation, or completed, with a CEO Endorsement/Approval date between 2010 and 2019. [Table A1.1](#) shows the number of projects in

**Table A1.1** Distribution of projects by Agency

Agency	Number	Percent
ADB	28	2
AfDB	39	3
BOAD	2	0
CAF	3	0
CI	25	2
DBSA	3	0
EBRD	10	1
FAO	125	9
FECO	1	0
Funbio	1	0
IDB	33	2
IFAD	30	2
IUCN	13	1
UNDP	554	39
UNEP	239	17
UNIDO	123	9
World Bank	166	12
WWF-US	9	1
Total	1,404	100

**Table A1.2** Distribution of projects by focal area

Focal area	Number	Percent
Biodiversity	257	18
Climate change	535	38
International waters	71	5
Land degradation	61	4
Chemicals and waste	41	3
Persistent organic pollutants	81	6
Ozone-depleting substances	3	0
Multifocal area	355	25
Total	1,404	100

the portfolio under study by Agency. [Table A1.2](#) shows the distribution by focal area.

## RECENTLY UPDATED POLICIES— QUALITY AT ENTRY REVIEW

5. This analysis will consist of a quality at entry review of new GEF activities that were initiated after the effectiveness dates of the updated policies (July 1, 2018, for Stakeholder Engagement and Gender and July 1, 2019, for Safeguards). The current size of the portfolio for the recently approved policies as of July 1, 2018, and July 1, 2019, is dis-

**Table A1.3** Projects received on or after July 1, 2018: to be reviewed for the recently approved gender

Project status	Full-size project	Medium-size project	PFD	Total
Pending approval	94	23	5	123
PIF/PPG approval or clearance	60	34		95
Council approved	52		8	62
CEO approved/endorsed	19	7		49
Total	225	64	13	329

**Note:** Project dates were normalized to capture the earliest date available for each project (PIF Submission/Entry into system, Entry into Work Program, Council Approval Date, and CEO Endorsement/Approval Date). Projects with earliest date available on or after July 1, 2018, and July 1, 2019, were then selected for the Stakeholder Engagement and Gender review and Safeguards review respectively. These data will be updated and finalized after June 30, 2020.

**Table A1.4** Projects received on or after July 1, 2019: to be reviewed for safeguards

Project status	Full-size project	Medium-size project	PFD	Total
Pending approval	67	21	5	94
PIF/PPG approval or clearance	10	5		15
CEO approved/endorsed	4	3		12
Total	81	29	5	121

## Appendix 2: Previous IEO evaluations—CSO Network and engagement with indigenous peoples

1. The evaluation of policies will be supplemented with information from updates of two previous evaluations described briefly below. The evaluations will serve as a starting point to analyze engagement with two important stakeholder groups: indigenous peoples and the CSO Network.

### CIVIL SOCIETY ORGANIZATIONS

2. For OPS5, IEO published a technical document, “Civil Society Organizations Engagement” (GEF IEO 2013a), which looked at tendencies and trends in civil society engagement by the GEF. It found that the Public Involvement Policy was outdated, not systematically implemented and largely ineffective, and that guidelines to strengthen existing mechanisms were lacking. The study also found that a systematic approach to monitor CSO engagement in the GEF was lacking. Investment by civil society (reflected through the full-size project/medium-size project and SGP portfolios) in the GEF was described by the evaluation as “stop(ping) short of being meaningful.” Recommendations included, inter alia, updating policies and guidance, incorporating practical indicators for measuring CSO engagement at multiple phases in the project cycle, and a regular review of the CSO Network as a the main GEF link to civil society.

3. The CSO Network was first evaluated in 2005, a second evaluation followed up on recommendations and actions stemming from the first review and explored new elements. The Evaluation of the GEF–Civil Society Organization (CSO) Network (GEF IEO 2016) covered two key evaluation questions:

- To what extent is the GEF-CSO network meeting its intended goals and strategic objectives and adding value to the GEF partnership and its members?

- How are Network features contributing to the effective and efficient functioning of the Network?

4. The 2016 evaluation found that the GEF-CSO Network received good to excellent marks regarding progress against its objectives. As well, the CSO Network was found to be relevant and delivering results to the GEF partnerships. However, the Network’s activities were found to be distant from the country level where GEF projects make their mark and from where the majority of Network CSOs operate. Four recommendations were issued: (1) a contemporary vision for the Network should be created, including a modality to finance Network activities; (2) clear rules of engagement should be developed to guide cooperation and communication; (3) the Network should continue to build itself as a mechanism for strengthening civil society participation in the GEF and (4) the Network should strengthen its governance.

### INDIGENOUS PEOPLES AND LOCAL COMMUNITIES

5. The Evaluation of GEF Engagement with Indigenous Peoples (GEF IEO 2018b) was an input into OPS 6. The purpose of the assessment was to assess the GEF’s engagement activities with Indigenous Peoples and provide lessons and insights leading to recommendations to strengthen GEF collaborations. This evaluation found that significant steps have been taken by the GEF to increase engagement and participation of Indigenous Peoples in the GEF and provides an overview of the history of the mechanisms that emerged to support this engagement. The evaluation reviewed the performance of the Indigenous Peoples Advisory Group, and found that while there were some

significant accomplishments, progress was hindered by constraints on performance including communication issues (language barriers), lack of capacity, staffing capacity in the Secretariat and the Agencies, and coordination. The evaluation also looked at the applicable safeguards minimum standard, and the GEF portfolio. The evaluation issued the following recommendations: (1) Establish and Strengthen dedicated funding opportunities for indigenous peoples projects/organizations; (2) Update relevant policies and guidelines to reflect best practice standards concerning indigenous

peoples, including a right-based approach to engagement; (3) Review the IPAG's role for operational constraints; (4) Facilitate dialogue between indigenous peoples and local communities and government focal points; (5) Monitor application of Minimum Standard 4 and the indigenous peoples portfolio.



# Evaluation matrix

Key question	Subquestion	Indicator/basic data/what to look for	Source of information	Methodology							
				Desk review	Portfolio review	Online survey	Interviews	Stakeholder mapping	Case study	Field work <sup>1</sup>	
<b>Coherence/strategic alignment</b>											
KQ 1: To what extent is there strategic alignment and consistency between the Stakeholder Engagement, Gender Equality and Safeguards policies?	To what extent are the policies internally consistent (structure, scope)?	Consistency within and between policies (cross-referencing, harmonization across the policies, etc.)	GEF Policy and Guidelines/Guidance, Strategy Documents	•				•			
	In what ways do the policies align with GEF strategies? Do they reflect convention guidance?	Alignment of GEF Policies with GEF strategy documents, over time	<ul style="list-style-type: none"> <li>• GEF Policy and Guidelines/Guidance</li> <li>• Strategy Documents, incl: GEF 2020 Strategy, GEF 7 Programming Directions, Integrated Program Strategies, Gender Implementation Strategy (2018), Conventions</li> </ul>	•			•				
	Does the GEF Stakeholder Engagement Policy align with international standards for international organizations including climate finance mechanisms? Are the recommendations from the 2018 IEO evaluation on safeguards reflected in the updated policy? Are the recommendations from the 2018 IEO evaluation on gender equality reflected in the updated policy and does it align with current best practice standards?	Similarities or differences of the policies compared to other international organizations, including climate finance mechanisms, based on international standards <sup>b</sup>	<ul style="list-style-type: none"> <li>• Policy documents</li> <li>• GEF Secretariat Staff</li> <li>• IEO evaluations</li> </ul>	•							
	To what extent do GEF partners perceive the set of policies as complementary to one another?	Stakeholder perceptions on policy consistency and clarity	GEF Secretariat Staff, Agency Staff, CSO Network, IPAG			•	•				

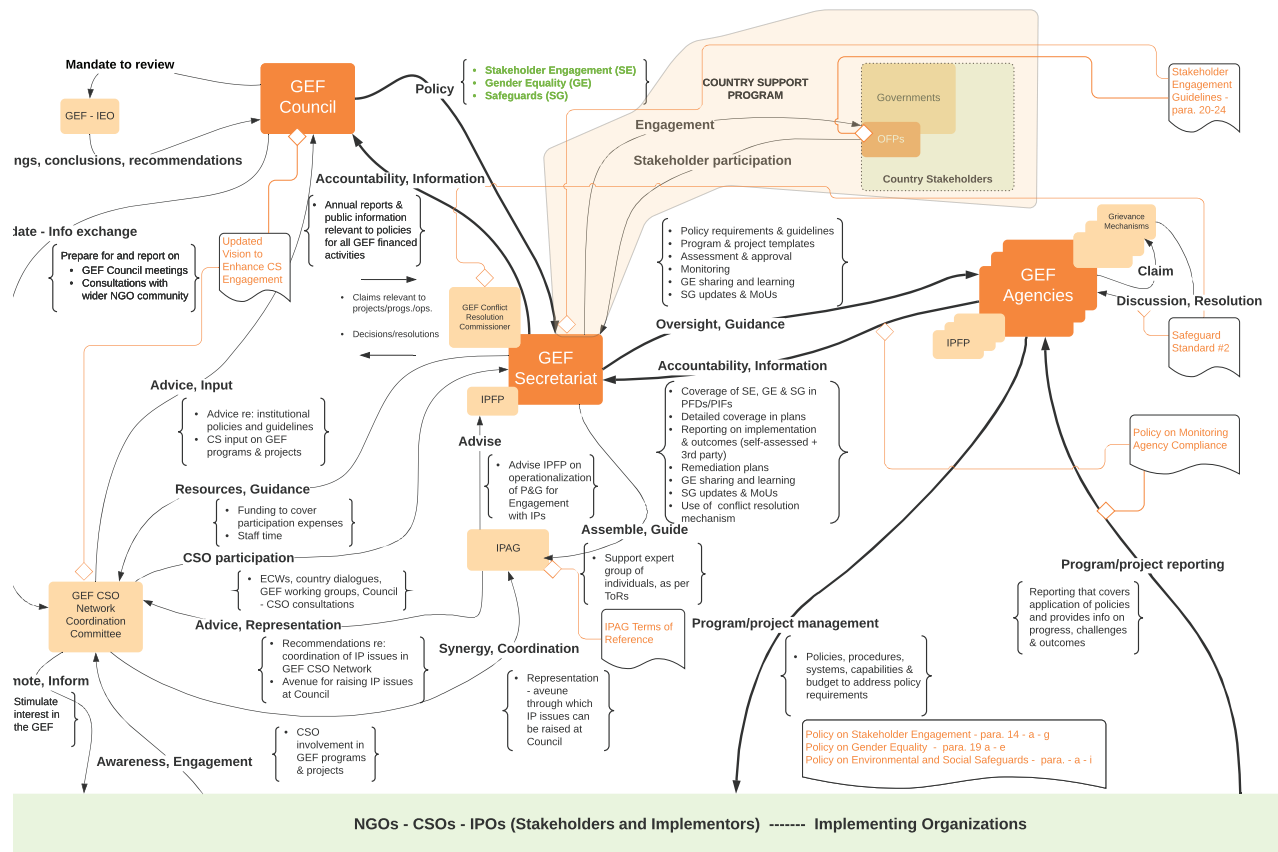
Key question	Subquestion	Indicator/basic data/what to look for	Source of information	Methodology						
				Desk review	Portfolio review	Online survey	Interviews	Stakeholder mapping	Case study	Field work <sup>1</sup>
<b>Operational relevance</b>										
KQ 2: To what extent is there buy-in across the Partnership and support for implementing these policies?	To what extent do stakeholders across the Partnership describe the policies (and associated guidelines) to be a help rather than a hindrance in the design and implementation of GEF-financed activities?  To what extent has the adherence to the policy on Stakeholder Engagement led to the inclusion of civil society, indigenous peoples and the private sector in the development of GEF policies, strategies and guidelines? Indicator—Stakeholder perceptions on the extent to which policies have resulted in substantial inclusion.	Stakeholder perceptions on how realistic, culturally attuned, operationally relevant and efficient the policies are, and on the extent to which they add value to the implementation of GEF financed activities	GEF Agency Staff, GEF Secretariat Staff, Council Members, OFPs, CSOs, IPAG							
	In what ways does the GEF Secretariat support the implementation of the policies?  What degree of reach has been achieved through these activities across the partnership?	<ul style="list-style-type: none"> <li>● Magnitude of resources allocated to ensuring uptake/ application of the updated policies (staff time, dedicated financing, training, etc.).</li> <li>● Coverage of capacity building activities</li> </ul>	<ul style="list-style-type: none"> <li>● Administrative data</li> <li>● Documents</li> <li>● GEF Secretariat staff</li> </ul>							
	To what extent do stakeholders indicate awareness of policy related training/orientation and, where indicated, what is their assessment of its efficacy?	Stakeholder perceptions on activities undertaken by the GEF to increase knowledge and capacity to apply policies, and associated outputs (e.g. online and in-person training, one-on-one support, guidelines and guidance issued, communities of practice, etc.)	<ul style="list-style-type: none"> <li>● GEF Agency Staff, GEF Secretariat Staff, Council Members, OFPs, CSOs, IPAG</li> <li>● Documents</li> </ul>							
	Across the partnership, are there patterns of deviation in the way policy requirements are enacted? What reasons are given for these deviations?	Evidence that the policies are well understood by stakeholders across the partnership	<ul style="list-style-type: none"> <li>● Document review templates</li> <li>● GEF Agency Staff, GEF Secretariat Staff, Council Members, OFPs</li> </ul>							
	Do existing quality assurance mechanisms provide sufficient information to demonstrate the application of policy requirements?	Existence of review processes and quality assurance mechanisms to track the application of policies	<ul style="list-style-type: none"> <li>● Templates for document review and PIF-CEO endorsement</li> <li>● GEF Secretariat Staff</li> </ul>							

Key question	Subquestion	Indicator/basic data/what to look for	Source of information	Methodology						
				Desk review	Portfolio review	Online survey	Interviews	Stakeholder mapping	Case study	Field work <sup>1</sup>
KQ 2: To what extent is there buy-in across the Partnership and support for implementing these policies?	To what extent does the corporate score card provide evidence-based reporting on the application of the policies, as per expectations?	Use of evidence-based reporting on the application of policies in the corporate scorecard	GEF Secretariat Annual Monitoring Report data and corporate score-card: Gender, Stakeholder Engagement, Safeguards	•						
	To what extent are expectations sufficiently explicit to convey performance against the policy objectives?	Perceptions about the effectiveness of monitoring and reporting on applications of policies	GEF Secretariat Staff, GEF Agency Staff, Council Members, OFPs, CSOs, IPs			•	•			
<b>Effectiveness</b>										
KQ 3 [Stakeholder Engagement Deep Dive]: To what extent do GEF supported activities promote inclusive and meaningful stakeholder participation in GEF governance and operations? <sup>3,4</sup>	How well have the policy requirements been adhered to in projects and programs in GEF 6?  To what extent are the policies reflected in the development of GEF Impact Programs?	Presence of the minimum requirements of the Stakeholder Engagement Policy (and the precursor Public Involvement Policy) at key stages in the project and program cycle (identification, design, implementation, completion)	Project Documents: PIFs, CEO Endorsement, MTRs, Implementation Reports and Terminal Evaluations		•					•
	To what extent are stakeholder interests represented in project documentation?	Representation of stakeholder interests (indigenous peoples, women, CSOs, local communities) in project and program documents	Project Documents: PIFs, CEO Endorsement, MTRs, Implementation Reports and Terminal Evaluations		•					
	To what extent has adherence to the Policy on Stakeholder Engagement led to the inclusion of civil society, indigenous peoples and the private sector in GEF projects? What are the findings and lessons?	Stakeholder perceptions on the extent to which policies have resulted in substantial inclusion (with case examples showing “better practices”)	GEF Agency Staff, GEF Secretariat Staff, Council Members, OFPs, CSOs, IPAG			•	•		•	•
	To what extent do the core principles of the Policy on Stakeholder Engagement reflect in the defining documents and operations of the CSO Network and the Indigenous Peoples Advisory Group (IPAG)? <sup>5</sup>	Integration of the core principles of the Stakeholder Engagement Policy in the policy and decision-making processes and platforms of, inter alia, the CSO Network and the IPAG	<ul style="list-style-type: none"> <li>• Project Documents</li> <li>• GEF Secretariat Staff, Council, GEF-CSO Network Coordination Committee, CSO Network member representatives, Non-Network member representatives, IPAG membership, IPFPs</li> </ul>	•		•	•			

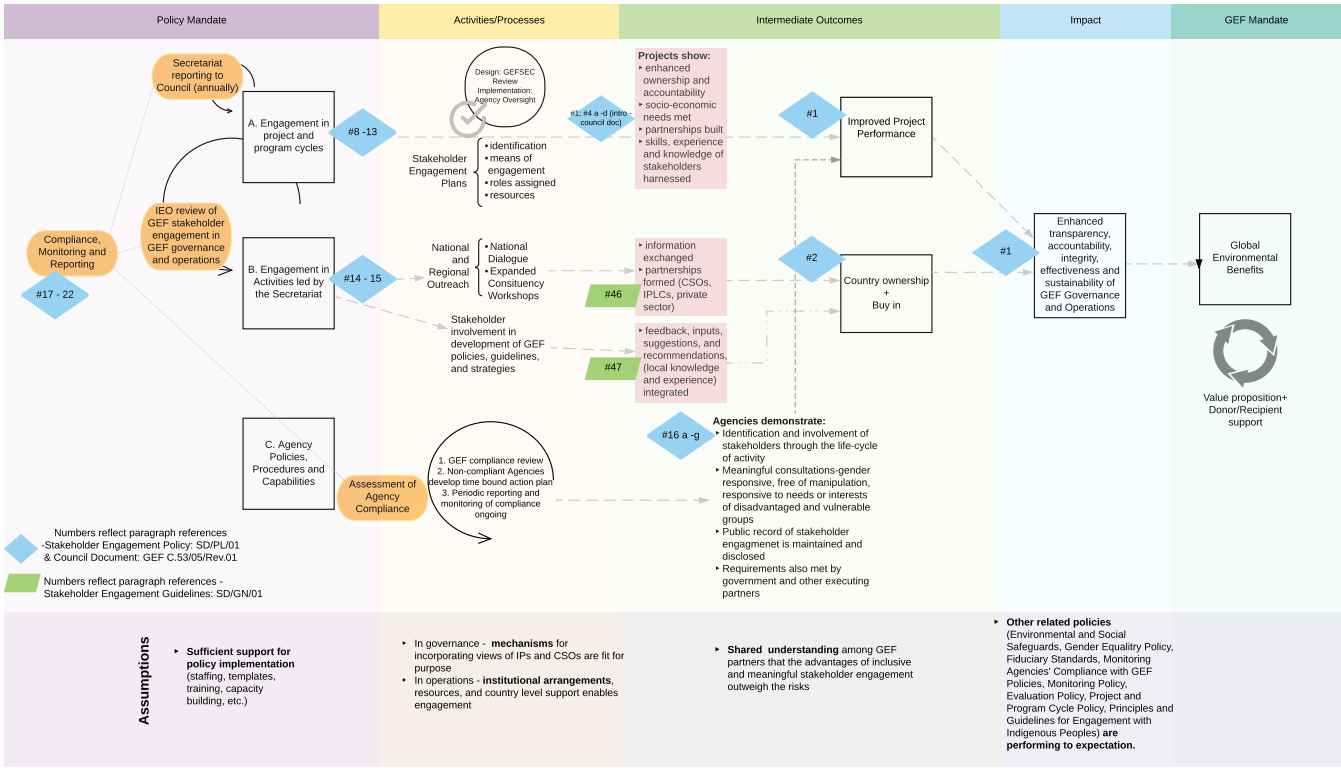
Key question	Subquestion	Indicator/basic data/what to look for	Source of information	Methodology							
				Desk review	Portfolio review	Online survey	Interviews	Stakeholder mapping	Case study	Field work <sup>1</sup>	
KQ 3 (Stakeholder Engagement Deep Dive): To what extent do GEF supported activities promote inclusive and meaningful stakeholder participation in GEF governance and operations? <sup>3,4</sup>	Were the recommendations of the Evaluation of GEF Engagement with Indigenous Peoples taken on board? Are the current mechanisms adequate to ensure inclusion of IPs in GEF governance and operations? Have there been any unintended consequences? <sup>6</sup>	Consistency between activities taken post 2017 evaluation of GEF Engagement with Indigenous Peoples (GEF IEO 2018b) and the requirements of the Stakeholder Engagement Policy	<ul style="list-style-type: none"> <li>Project Documents</li> <li>GEF Secretariat Staff, Council, GEF-CSO Network Coordination Committee, CSO Network member representatives, Non-Network member representatives, IPAG membership, IPFPs</li> </ul>	•		•	•				
	Considering that CSOs are a major channel for stakeholder engagement, what has happened since the IEO evaluation of the CSO Network, what actions were taken such that the link between CSOs and the CSO Network was strengthened? Has this led to more inclusive and meaningful participation of CSOs in the GEF? Have there been an unintended consequence? <sup>7</sup>	Consistency between post 2016 evaluation activities of the CSO Network (GEF IEO 2016) and the requirements of the Stakeholder Engagement Policy, including actions taken within GEF to strengthen the link between the CSO Network and the CSOs	<ul style="list-style-type: none"> <li>Project Documents</li> <li>GEF Secretariat Staff, Council, GEF-CSO Network Coordination Committee, CSO Network member representatives, Non-Network member representatives, IPAG membership, IPFPs</li> </ul>	•		•	•				
KQ 4: To what extent are the updated policies (Stakeholder Engagement, Gender Equality, and Safeguards) being applied to new GEF-financed activities and are there any lessons from early implementation of these policies?	To what extent have the updated policies (Gender Equality, Environmental and Social Safeguards, and Stakeholder Engagement) been implemented and mainstreamed into GEF projects since their respective development? Are there any lessons that emerge from the early phases of implementation of GEF 7 activities?	Quality at entry review for policy compliance for the portfolio of new GEF-financed activities after the updated policies became effective.	Project Documents: PIFs, CEO Endorsement		•						
<b>Impact</b>											
KQ 5 (Stakeholder Engagement Deep Dive): To what extent is there evidence linking stakeholder engagement with project and program impacts?	Is there any link between project compliance to the Stakeholder Engagement Policy and higher outcome ratings? Is stakeholder engagement reported as a factor that contributes to positive outcomes and/or likelihood of sustainability?	<ul style="list-style-type: none"> <li>Patterns of evidence showing a correlation between stakeholder participation and project/program outcomes.</li> <li>Identification of stakeholder engagement as a factor for success in terminal evaluations</li> </ul>	<ul style="list-style-type: none"> <li>Project Documents</li> <li>TE Ratings</li> </ul>		•						
	Has the introduction of the Policy on Stakeholder Engagement had any influence on organizational behavior at an Agency level?	Evidence of catalytic effect of the policies: Do GEF Agencies report that they changed their internal policies or approaches based at least in part on the GEF policies?	GEF Agency Staff, GEF Secretariat Staff				•				

1. Field work will only take place if possible; please see section on limitations and COVID-responsiveness in approach paper ([annex A](#)).
2. There will be an in-depth review for the Stakeholder Engagement policy which has never been evaluated by IEO. For the other two policies, the review will assess whether recommendations from previous IEO evaluations are reflected in the updated policies.
3. This question focuses explicitly on the Stakeholder Engagement Policy, but will likely include findings relevant for gender and safeguards due to the connected and sometimes overlapping coverage of these policies.
4. One GEF-financed activity that supports stakeholder engagement at the GEF is the Country Support Program (CSP). This will not be covered as part of this evaluation, as there is a separate, stand-alone evaluation on the CSP that is being conducted at the same time as this evaluation. Findings from the CSP evaluation will be incorporated into the final evaluation report.
5. More specifically: To what extent has the Policy on Stakeholder Engagement influenced the CSO Network in the following areas: a) the current set of rules and procedures governing CSO Network operations? b) the CSO Network's Strategic Plan?, and c) the day to day functioning of the CSO Network Coordination Committee? In what ways could alignment be reinforced/strengthened? .What is the level of consistency between the core principles outlined in the Policy on Stakeholder Engagement and: a) the IPAG Terms of Reference and other defining documents? B) its operations? In what ways could the alignment be strengthened? To what extent do the functions of, inter alia, the CSO Network and the IPAG reinforce each other in the service of stakeholder participation?
6. In particular: What progress has been made by the GEF toward enhancing funding opportunities for Indigenous Peoples and projects? Is there evidence of improved indigenous peoples engagement in GEF programs and projects stemming from these funding opportunities? To what extent does the 2018 Policy on Environmental and Social Safeguards (in particular, the content in Standard #4), address shortcomings observed in the Evaluation of the 2011 policy? Specifically, what steps have been taken by the GEF to address: a) definition issues associated with "Indigenous Peoples"? b) definition and application of FPIC with the GEF? What progress has been made toward relieving observed operational constraints on the IPAG including: the scope of its mandate, succession planning and onboarding, communications, staffing allocations to focal point roles, awareness of the GEF within Indigenous People's networks? What steps have been taken by the GEF to engage national governments showing a reticence to address Indigenous Peoples' issues in GEF funded programs and projects? What can we learn from initiatives taken to date? What progress has been made by Agencies in the tracking of Indigenous People's engagement around the GEF program and project cycle? What steps have been taken in the GEF to allow for a portfolio analysis of Indigenous People's engagement as set out in the Policy on Stakeholder Engagement?
7. To what extent has the Updated Vision to Enhance Civil Society Engagement with the GEF (2017) clarified the CSO-Network's role in the GEF partnership and, in particular, vis-à-vis the requirements of the Policy? What progress has been made by the GEF-CSO Network in building itself as a mechanism for strengthening civil society participation in the GEF in the following areas: country level engagement with CSOs, membership recruitment, network communications and skills building, GEF policy/strategy development, and engagement with other GEF partners and relevant bodies? In what ways, under the Policy on Stakeholder Engagement, has the GEF partnership (i.e. Council, GEF Secretariat, Agencies, the SGP, and country governments mainly) enabled: a) the GEF-CSO Network to be a mechanism for strengthening civil society participation in the GEF? b) CSOs operating outside of the Network to participate in the program/project cycle or in other GEF-financed activities?

# Policy needs and yields



# Stakeholder engagement policy theory of change



# Interviewees

## E.1 Costa Rica

Patricia Bolaños Chacon, Director of International Cooperation and International Relations, Department of Cooperation and International Relations - MINAE

Agripina Jenkins, Program Officer, Dirección de Cambio Climático

Ana Lucia Moya Mora, Program Officer, Dirección de Cambio Climático

Jose Maria Blanco, Executive Director, Biomass Users Network (BUN-CA)

Victoria Rudin, Executive Director, ACEPESA

Jose Dualok Rojas Ortiz, President, Cultural Association SEJEKTO of Costa Rica

Andrés Araya Montezuma, President, Asociación Costa Rica Integra

Irene Murillo Ruin, Executive Director, Centro de Derecho Ambiental y de los Recursos Naturales (CEDARENA)

Yunae Yi, Safeguards Advisor, Gender and Safeguards Unit – UNEP

Kifah Sasa, Officer for the Environmental Program, Small Grants Programme – UNDP

Ana Rita Chacon Araya, Head of Department, Department of Development – National Meteorological Institute

Diana Madrigal Barquero, Pedro Moreo Mir, Silvia Ortiz Stradtman, Inter-American Development Bank

## E.2 India

Max Zieren, GEF Task Manager, UNEP, Asia & Pacific Office

Raymond Brandes, Programme Management Officer (Gender), Gender and Safeguards Unit, Programme Division, UNEP

Seema Bhatt, Biodiversity Expert, FAO India

Kinda Chavva, Assistant Representative (Programme) FAO

Sejal Worah, Program Director, WWF-India

Crawford Prentice, Project Design Specialist, UNDP

Sabita Parida, Gender and Social Inclusion Consultant, UNDP

Ruchi Pant, Head, NRM and Biodiversity, UNDP

T. Vijay Kumar, Vice Chairman, Rythu Sadhikara Samanthha (RySS)

Archana Godbole, Director, Applied Environmental Research Foundation (AERF)

## E.3 Mozambique

Theлма Munhequete, Africa Foundation for Sustainable Development Mozambique, Managing Director

Sara Sangareau, VIDA (ONGD), Project Coordinator

Jerome Stucki, United Nations Industrial Development Organization, Focal Point, National Action Plan on Mercury in the Mozambican Artisanal and Small-Scale Gold Mining sector Project

Carlos Chanduvi-Suarez, United Nations Industrial Development Organization, Focal Point, Towards Sustainable Energy for All in Mozambique: Promoting Market-Based Dissemination of Integrated Renewable Energy Systems for Productive Activities in Rural Areas Project



Augusto U. Correia, UNDP, National Coordinator GEF/ UNDP SGP

Antony Alexander, Peace Parks Foundation (PPF), Senior Project Manager: Great Limpopo and Lubombo Transfrontier Conservation Areas

Giovanna Fotia, ICEI—Institute for International Economic Cooperation, Project Coordinator for ICEI Mozambique

Carla Cuambe, FAO, Program specialist and Project's Focal Point

Isidro Joaquim, UATAF-AFC Unidade De Assistência Técnica De Alfabetização Funcional, Executive Director

João Machel, Provincial Directorate of Land and Environment, Zambézia, Forest officer of Community Management Unit

Teresa Nube, Ministry of Land and Environment, Head of Community Management Department

Olivia Felicio Pereira, Gorongosa Restoration Project, Programs Officer

Mike Marchington, Operations Director

## E.4 The Philippines

Francesco Ricciardi, Environmental Specialist, ADB

Carmela Centeno, Industrial Development Officer, United Nations Industrial Development Organization

Leah Texon, National Expert, United Nations Industrial Development Organization

Katarina Barunica, Industrial Development Officer, United Nations Industrial Development Organization

Maxim Vergeichik, Technical Advisor, UNDP

Christina Supples, Senior Technical Advisor, UNDP

Theresa M. Tenazas, OIC, Wildlife Resources Division, Biodiversity Management Bureau, Department of Environment and Natural Resources

Arthur Barrit, Executive Assistant, National Executive Officials/Liaison Officer, Associated Labor Unions-Trade Union Congress of the Philippines (ALU-TUCP)

Oliver Agoncillo, Executive Director, Foundation for Philippine Environment

Aileen Lucero, National Coordinator, EcoWaste Coalition

Renato D. Boniao, Foundation for Science and Technology Development, Inc.

Margarita dela Cruz, Executive Director, Guiuan Development Foundation, Inc.

Ronely Bisquera-Sheen, Executive, Director, Tanggol Kalikasan

## E.5 GEF Agencies

Nancy Bennet, GEF Coordinator, UNDP

Ciara Daniels, Gender, Results and Reporting Coordinator, UNDP

Liu Lei, Safeguards and Gender Equality Coordinator, FECO

Nina Zetsche, Partnerships Coordination Division, Safeguards, United Nations Industrial Development Organization

Shaanti Kapila, Senior Operations Officer, World Bank

Erika Drazen, Manager, Environmental and Social Safeguards, WWF

James Lea Cox, Principal Environmental Advisor, EBRD

Martin McKee, Senior Environmental Advisor, EBRD

Madhumita Gupta, Principal Safeguard Specialist, ADB

Metis Llagan, Senior Social Development Officer, ADB

Bruce Dunn, Director, Environment & Safeguards, ADB

Rosario Catalina Narciso, ADB/GEF Portfolio Management Officer & Consultant, ADB

Lainie Thomas, NGO Civil Society Center, ADB

Ian Kissoon, Director, Environmental and Social Framework, CI

Orissa Samaroo, GEF Policy and Project Management, CI

Arslan Njiyv, Civil Society Engagement, EBRD

Guy Henley, GEF Coordinator, Donor Financing Team, EBRD

Rachel Kennedy, Environmental and Social Department, EBRD

Guillermo Brad, Partnerships and Collaboration, FAO

Genevieve Braun, GEF Coordinator, FAO

Bougadare Kone, Safeguards, FAO

Lev Neretin, Safeguards, FAO

Tommaso Vicario, Safeguards, FAO

Guy Henley, GEF Coordinator, Donor Financing Team, EBRD

Rob Cole, Principal Social Advisor Safeguards, EBRD

Yon Fernandez-de-Larrinoa, Head of Unit, FAO, Indigenous Peoples Unit

Guido Agostinucci, FPIC Coordinator, FAO

Mariana Estrada, Knowledge Management and Gender Specialist, FAO

Mauricio Mireles, Policy Officer and Indigenous Peoples Regional Focal Point for Regional Office for Latin America and the Caribbean, FAO

Valeria Gonzalez Riggio, Program Officer, Climate, Biodiversity and Environment, Latin America and Canada Portfolio, FAO

Sheila Mwanundu, Lead Technical Specialist, Environment and Climate Department, IFAD

Eric Patrick, Climate Change Adaptation Specialist, IFAD

Sebastien Delahaye, Portfolio Manager, GEF and GCF Coordination Unit, IUCN

Jenny Springer, Director Global Program on Governance and Rights, IUCN

Anshuman Saikia, Regional Programme Support Coordinator, Asia

Alexandra Ortega Rada, IDB-GEF Technical Specialist, IDB

Laura Natalia Rojas Sanchez, Environment and Social Sustainability Advisor, IDB

Annette Bettina Killman, Operations Advisor, Sustainable Development Sector, IDB

Mauricio Velasquez, Principal Executive, Green Business Unit, CAF

Octavio Carrasquilla, Principal Executive, Renewable Energy and Environment, CAF

Federico Vignatti, Coordinator, Andes Adaptation to the Impact of Climate Change on Water Resources (AICCA) Project, CAF

Rene Gomes Garcia, Head of Green Business Unit, CAF

Luciana Fainstain, Gender Environment and Public Policy Specialist, CAF

Juan Palacios, Principal Executive, Green Business Unit and CAF-GEF Coordinator, CAF

Federico Vignatti, Coordinator, Andes Adaptation to the Impact of Climate Change on Water Resources (AICCA) Project, CAF

Cecilia Guerra, Principal Executive for Sustainability, Inclusion and Climate Change, CAF

Mauricio Velasquez, Principal Executive, Green Business Unit, CAF

## E.6 GEF Secretariat

Henry Salazar, Coordinator for Operations Policy, Partnerships, and Operations Unit, GEF

Gustavo Alberto Fonseca, Director of Programs, GEF

Claude Gascon, Manager of Programs, GEF

Francoise Clottes, Director of Strategy and Operations, GEF

Paola Ridolfi, Manager of Strategy and Operations, GEF

Carlos Manuel Rodriguez, CEO, GEF

Pilar Rey, Senior Operations Officer, Partnerships Coordinator, GEF

Gabriella Richardson Temm, Gender and Social Issues Coordinator, GEF

Mathew Reddy, Private Sector Specialist, GEF

## E.7 GEF Council

Mathew Haarsager, Council Member, Deputy Assistant Secretary for International Development Finance and Policy at U.S. Treasury

Rob Wing, Council Member, Chief for Environment and Trade at U.S. Department of State

Marita Olson, Council Member, Sweden

## E.8 Other GEF

Yoko Watanabe, Global Manager of the GEF SGP

## E.9 Civil society

Kathleen Rogers, President of Earth Day Network and GEF-CSO Network

Katie Wood, Manager Conservation Programs, Earth Day Network and GEF-CSO Network

Gao Xiaoyi, Department of International Cooperation, All China Environmental Federation (ACEF), Regional Focal Point for North East Asia

Patricia Turpin, President of Environment Tobago, Regional Focal Point for Caribbean

Victor Kwanga, Chair of the CSO Network 2017–19

Sano Akhteruzzaman, Chair of the CSO Network 2019, current

Maria Leichner, Director General of Fundacion ECOS Uruguay Vice Chair of the CSO Network

Lilliana Hisas, Executive Director of the Universal Ecological Fund, member and former focal point in CSO Network

Irina Mrktchyan, Founder, Innovative Solutions for Sustainable Development of Communities (ISSD), Armenia; member of the CSO Network

Michela Izzo, Executive Director, Guakia Ambiente;  
member of the CSO Network

Guillermo Harris, Senior Conservationist, Wildlife Conservation Society

Julia Grimm, Policy Advisor, Climate Finance & Adaptation, Germanwatch e.V.

Young Hee Lee, Governance Specialist, Legal & Gender Focal Point, Adaptation Fund

Aya Mimura, Financial Analysis, Adaptation Fund

John Garrison, Civil Society Specialist, World Bank

Andres Pablo Falconer, Consultant, Stakeholder Engagement at Climate Investment Funds

Juan Pablo Hoffmaister, Multilateral Governance Advisor, Office of Governance Affairs, GCF

## E.10 IPAG and related

Lucy Mulenkei, Executive Director of the Indigenous Information Center (IPAG Chair)

Yolanda Teran, Education Coordinator of the Indigenous Women Network on Biodiversity from Latin America and the Caribbean

Gonzalo Oviedo, Senior Advisor, Social Policy Program, IUCN (Expert)

Terence Hay-Edie, Programme Advisor, United Nations Development Programme (GEF Agency Principal Representative)

Carlos Perez-Brito, Social Specialist, Inter-American Development Bank (GEF Agency Alternate Representative)

Giovani Reyes, Philippine ICCA Consortium

Alisi Rabukawaqa, Project Liaison Officer at IUCN

David Sheppard, Independent Consultant to the IPAG

Sarah Amy Wyatt, Biodiversity Specialist, GEF Secretariat

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Independent Evaluation Office, Global Environment Facility  
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