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**SEMI-ANNUAL EVALUATION REPORT OF THE
INDEPENDENT EVALUATION OFFICE: JUNE 2019**

(Prepared by the Independent Evaluation Office of the GEF)

Recommended Council Decision

The Council, having reviewed document GEF/ME/C.56 /01/Rev.01 the “Semi-Annual Evaluation Report of the GEF Independent Evaluation Office: June 2019,” endorses the recommendations of the Annual Performance Report 2019: Special Thematic Focus on Sustainable Transport and Value for Money Analysis of GEF Interventions in Support of Sustainable Forest Management and approves the terms of reference for the professional peer review of the Independent Evaluation Office.

With respect to the Evaluation of GEF Support to Scaling up Impact, the Council notes with appreciation the analysis presented and endorses the following recommendation:

The GEF partnership needs to ensure that factors influencing scaling up are identified and taken into account in program and project design and implementation, and their impact assessed at midterm and terminal evaluations.

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EXECUTIVE SUMMARY

1. FY 2019 represents the last year of IEO operations under GEF-6. In December 2018 the IEO presented the findings from the evaluations on Biodiversity Mainstreaming, the GEF-UNIDO Cleantech program and the Framework on Evaluating GEF Additionality. This Semi-Annual Evaluation Report (SAER) presents the Annual Performance Report with a special thematic focus on GEF initiatives in sustainable transport, a Value for Money Analysis of GEF Interventions in Sustainable Forest Management, and an evaluation of GEF's Support to Scaling up Impact. The SAER also includes an update on the evaluations in progress, the peer review of the IEO, the knowledge management activities of the office and a summary of the Management Action Record. The full evaluation reports and the terms of reference for the peer review of the IEO are included as information documents.

- (1) GEF/ME/C.56/Inf.01 - Annual Performance Report 2019: Special Thematic Focus on Sustainable Transport
- (2) GEF/ME/C.56/Inf.02 - A Value for Money Analysis of GEF Interventions in Support of Sustainable Forest Management
- (3) GEF/ME/C.56/Inf.03 - An Evaluation of GEF Support to Scaling up Impact
- (4) GEF/ME/C.56/Inf.04 - Terms of Reference for the Peer Review of the Independent Evaluation Office

I. COMPLETED EVALUATIONS

A. Annual Performance Report 2019: Special Thematic Focus on Sustainable Transport

1. The 2019 Annual Performance Report (APR) is based on the evidence provided in the terminal evaluation reports for 1,566 completed GEF projects which account for approximately \$6.9 billion in GEF grants. Terminal evaluations for 193 projects accounting for \$616.6 million in GEF grants were received and validated during 2018-2019 and these projects constitute the 2019 cohort. The IEO has aligned the year of the respective cohorts with the year when the APR is presented to the GEF Council. Projects approved in GEF-5 (33 percent), GEF-4 (40 percent) and GEF-3 (20 percent) together account for most of the 2019 cohort. Although 10 GEF Agencies are represented in the 2019 cohort, most of these projects have been implemented by UNDP (56 percent), World Bank (15 percent), and UNEP (12 percent). APR 2019 also includes a special thematic focus on the GEF portfolio of sustainable transport projects.

2. **Overall, 80 percent of all completed GEF projects with terminal evaluations have satisfactory outcomes**, with the ratings for the 2019 cohort slightly lower at 78 percent. Compared to the long-term average of 62 percent, 59 percent of the projects of the 2019 cohort were rated in the likely range for sustainability. The difference between the long-term average and the 2019 cohort is not statistically significant on outcomes or sustainability.

3. Compared to the portfolio average of 80 percent, 83 percent of the projects of the 2019 cohort were rated in the satisfactory range for quality of implementation and 77 percent of the projects of the 2019 cohort have satisfactory execution ratings, close to the overall portfolio average of 80 percent.

4. The expected level of co-financing was realized in nearly half the projects in the 2019 cohort. The ratio of realized co-financing to GEF grants for the 2019 cohort is 6.5 to 1. This is nominally higher than the portfolio average of 6:1.

5. The 2019 cohort also shows a continued trend in improvement in the M&E design rating. Compared to the portfolio average of 65 percent of projects rated in the satisfactory range for M&E design, 80 percent of the projects of the 2019 cohort are rated in the satisfactory range. While the quality of M&E implementation also shows improvement, the level of improvement has been relatively modest. Compared to the long-term portfolio average of 65 percent, 70 percent of the projects of the 2019 cohort are rated in the satisfactory range for M&E implementation.

SUSTAINABLE TRANSPORT

6. Since 1999, the GEF has provided support to promote low carbon transportation. The GEF has cumulatively provided about \$500 million in grants for 80 sustainable transport projects, most of which address concerns related to urban transport. The GEF support is highly relevant to the UN Sustainable Development Goal on sustainable cities and communities (Goal

11), which recognizes the need to provide people access to safe, affordable, accessible, and sustainable transport systems.

7. The GEF portfolio in sustainable transport continues to grow, is an integral part of the impact program on sustainable cities and is also being supported separately through other programs and projects. To understand the performance of GEF's interventions in this sector, and to draw lessons for future projects, the IEO has undertaken an evaluation of the GEF portfolio of sustainable transport projects, as a special case study within the framework of the APR. The evaluation assesses the type of activities that the GEF has supported, the results of the supported activities, lessons from the implementation experience, and the value added by the GEF.

Results and Conclusions

Project Portfolio

Conclusion 1. GEF support for sustainable transport is relevant and is correlated with the distribution of urban population across GEF recipient countries.

8. A large percentage (96 percent) of GEF sustainable transport projects is focused on urban transport. This focus is appropriate because urban transport provides substantial GHG emissions abatement opportunities. GEF support for sustainable transport across regions is also associated with their respective share in the total urban population of the GEF recipient countries. Among the GEF regions, Asia accounts for 56 percent of the total urban population of GEF recipient countries, Latin America and Caribbean (LAC) for 18 percent, Africa for 15 percent, and Europe and Central Asia (ECA) for 11 percent. The share of these regions in the GEF sustainable transport portfolio funding shows a similar pattern with Asia accounting for 56 percent, LAC for 22 percent, Africa for 13 percent, and ECA for 9 percent. The demand for GEF financing for sustainable transport is relatively higher from upper-middle-income recipient countries.

Conclusion 2. The GEF portfolio of sustainable transport projects has evolved from its initial focus on providing support for low carbon technologies to providing support for transport planning, modal-shift, travel demand management, and commercialization of electric mobility technologies using integrated approaches.

9. Over the past two decades, the GEF portfolio has evolved from fuel cell and electric/hybrid technologies to include projects that address bus rapid transit (BRT), non-motorized transit, and freight and logistics. A few projects also promote efficiency in metro rail, waterways and ground transportation in aviation. Projects that promote low carbon technologies are significant in the portfolio. Majority of the projects focus on capacity development, changes in the legal, policy and regulatory framework, and in facilitating urban and land use planning. Since 2008, programmatic approaches have been used to address sustainable transport along with other environmental and development concerns through an

integrated lens. During the GEF-7 period, the GEF is providing support to recipient countries through a program to facilitate uptake of electric mobility.

Outcomes

Conclusion 3. The GEF has made valuable contributions to facilitating the use of low carbon technologies, enhancing the efficiency of public transit and freight transport, promotion of non-motorized transit, and energy efficiency benchmarking for marine transport and ground transport in aviation.

10. The GEF has facilitated the transformation of the markets for electric/hybrid and fuel-cell based mobility technologies in China, and subsequently in Malaysia and South Africa. Fuel cell technologies are now being commercialized in China with GEF support. GEF financing helped lay the groundwork for BRT systems in several major cities such as Mexico City (Mexico) and Dar-es-Salaam (Tanzania). Dissemination activities combined with demonstrations have facilitated replication in other cities. Several projects have effectively implemented non-motorized transit including, construction and/or repair of bike lanes and walkways, spaces for bike parking, demonstration of the bike share business model, awareness campaigns, and preparation of a non-motorized transit plan.

Conclusion 4. Effectiveness of transport planning and traffic demand management activities depend on the level of support from, and alignment with, the vision of the local leadership.

11. The GEF has supported integrated land-use and transport planning activities in most completed transport projects. In addition to sustainable urban transport plans, a major focus was on transit-oriented development (TOD), which aims to maximize density around public transit facilities. GEF support for transport planning successfully facilitated TOD in cities, such as Mexico City (GEF ID 1155) and Changsha, China (GEF ID 4156). In other cities, such as Dushanbe, Tajikistan (GEF ID 3027) and Tianjin, China (GEF ID 3824), these efforts were less successful as they were either not aligned with the vision of the local decision makers or had not adequately addressed the policy and regulatory barriers. In cases where traffic demand management requires tradeoffs, commitment from political leadership and public support becomes important. For example, a quota on the number of car licenses in Guangzhou, China (GEF ID 2609) was effective in reducing car use and led to GHG emissions abatement, because the measure had the city leadership's support. In contrast, electronic road pricing in Jakarta, Indonesia (GEF ID 2954) and implementation of congestion pricing plan in Santiago, Chile (GEF ID 1349) could not move forward due to lack of adequate political support.

Conclusion 5. Compared to other recipient countries, a higher percentage of completed sustainable transport projects in the large emerging economies are rated as having satisfactory outcomes. GEF's significant contributions are in the areas of policy reform and capacity building. Aggregate GHG emissions abatement for completed projects has been lower than that expected at project start.

12. Seventy-two percent of completed sustainable transport projects have satisfactory outcomes and 70 percent are rated as likely to be sustainable. These ratings are comparable to the rest of the GEF portfolio. Sustainable transport projects in the large emerging economies are more likely to be rated in the satisfactory range (92 percent) compared to other recipient countries (50 percent). High turnover of project personnel, poor coordination, challenges in procurement, insufficient government commitment/ownership, and low capacity of executing agencies, contributed to lower outcomes. There is however no difference in the sustainability ratings between these two groups. About 50 percent of the projects promoted changes in legal and regulatory frameworks and 81 percent of the projects made significant contributions to capacity building, and this has not only improved the ability of the municipal governments to pursue sustainable transport initiatives but has also facilitated knowledge-sharing among cities and countries.

13. For 20 completed projects that report information on GHG emissions abatement, the aggregate adjusted life time total is 11.0 Mt CO₂ equivalent.¹ This is lower than the adjusted 92.9 Mt CO₂ equivalent expected at project start. Of the 20 projects, eight (40 percent) met or exceeded their individual targets. The average cost of GHG emission abatement is \$ 11.5, with a median of \$ 12.7.

Value added by GEF Support

Conclusion 6. GEF funding generally adds value to conventional transport projects through mainstreaming of low carbon approaches. In a significant number of projects, GEF funding supports speedier adoption and/or enhances the viability of low carbon approaches.

14. In 73 percent of the approved projects GEF financing helps in mainstreaming low carbon approaches in a conventional project through provision of technical assistance and capacity development to city governments and transport agencies, encouraging optimal decisions regarding their urban transport systems and related investment. Other overlapping ways through which GEF financing adds value include enhancing speed in affecting change through either bringing in new technology or changing behaviors or markets, and through increasing viability and scale-up of the supported activities. GEF is more likely to add value in projects implemented by the UN organizations through enhancement in viability and speed in promoting adoption and affecting change; whereas development banks generally use GEF funding to mainstream low carbon approaches in their conventional urban transport projects.

¹ To ensure consistency in reporting, the GHG emissions abatement estimates provided in the terminal evaluations have been adjusted based on the standards suggested in the Transport Emissions Evaluation Models for Projects (TEEMP) model. In cases where no attribution, or only a negligible attribution, is possible, the GHG benefits of GEF project have been adjusted accordingly.

Factors affecting results

Conclusion 7. Sustainable transport projects receive relatively higher co-financing commitments and perform as well as, or better than other projects in terms of realized co-financing.

15. The co-financing ratio for sustainable transport projects is \$19 per dollar of GEF grant, which is substantially higher than the ratios achieved by other projects in the GEF portfolio. For example, other climate change projects achieve a co-financing ratio of \$9 per dollar of GEF grant, and the co-financing ratio for entire portfolio of comparable GEF projects is \$6 per dollar of GEF grant. Recipient countries account for 57 percent of co-financing, followed by MDBs.

Conclusion 8. Sustainable transport projects are complex and are likely to face challenges in procurement and coordination. The quality of project monitoring plans is an area of concern.

16. Sixty-eight percent of completed sustainable transport have satisfactory ratings for the quality of implementation compared to 82 percent for the overall GEF portfolio. Information from terminal evaluations and respondents indicates that sustainable transport projects require coordination among multiple agencies and face procurement-related difficulties. Compared to large emerging economies, in other recipient countries, the concerns related to coordination, procurement and staff turnover are reported more frequently, but in general the projects do not need long extensions for completion. Compared to other projects in the GEF portfolio, less than half of the projects are satisfactory in the quality of M&E design and M&E implementation respectively, compared to about 65 percent, for both these dimensions, for the entire GEF portfolio. There is a considerable gap in the specification of results indicators for sustainable transport projects, as only 42 percent of the approved sustainable transport projects specify indicators to track GHG emissions abatement and/or fuel savings.

GEF's Comparative Advantage and Future Considerations

17. The GEF portfolio of sustainable transport projects has evolved to meet the needs of GEF recipient countries. GEF support is needed as the demand for sustainable transit increases in low income and low middle-income countries, especially those that are experiencing rapid growth in urban population. Integrated city centric approaches and approaches that target specific transport sectors are encouraged. The Sustainable Cities Impact Program could harness opportunities to promote urban and transport planning, especially transit-oriented development, through engaging a wide range of relevant agencies working at the city level. However, there is a risk that ensuring coordination among a wide range of stakeholders may be difficult. So far little evidence is available on how this is working on the ground. Program monitoring is important to assess on-the-ground progress so that, if required, corrective action may be taken in a timely manner.

18. During GEF-7, the GEF has opened a climate change mitigation funding window to provide support for electric mobility. This continues to be an important area for GEF support. Support in freight and logistics would help countries in efficiency gains and may be addressed at

the national or provincial scale by working closely with relevant industry and government agencies.

19. GEF is especially valued by its partner Agencies and recipient countries in urban and transport planning; development of legal, policy and regulatory measures; and capacity development. Measures that affect traffic demand and reduce congestion in urban roads continue to be relevant, and require political support if trade-offs are present.

20. Future areas for consideration include the development of policies and regulations related to the use of autonomous vehicles and ride share, and the promotion of technical solutions which promote transit efficiencies such as development of multi-modal journey planner applications based on open source and standardized data.

Recommendations

Recommendation 1: M&E design used for monitoring results of sustainable transport projects should be consistent with the project's theory of change.

21. GEF projects should specify clear assumptions on how a project would achieve its long-term intended results, and a clear methodology should be applied across projects to assess GHG emissions abatement. GEF projects currently clearly specify the total GHG reduction from the GEF supported project and include activities supported through co-financing. GEF should also track the incremental benefits achieved from GEF funding so that a clear metric is available to assess GEF's efficiency in delivering a unit of GHG emissions abatement. For projects where the primary focus of GEF funding is on capacity development, knowledge management and changes in legal, policy and regulatory measures, the GEF should also monitor progress based on process and behavioral change/policy reform indicators. This approach will be particularly helpful in monitoring results for the Sustainable Cities Impact Program with its focus on urban land use and transport planning, capacity building and knowledge exchange.

Recommendation 2. GEF should continue to prioritize funding for capacity development, urban and transport planning, and policy and regulatory framework development activities. The GEF should restrict support for civil works to pilot and/or demonstration of sustainable transport approaches.

22. GEF financing is generally used to provide funding for transport planning, capacity development, policy and regulatory reform, and information dissemination. This focus is relevant and appropriate because it facilitates speedier adoption of sustainable transport approaches and could lead to the optimal design and management of transit infrastructure. However, in some instances GEF funding has also been used to partly finance civil works such as the construction and repair of bike lanes and roads. This funding should be limited to pilots or demonstration.

B. Value for Money Analysis of GEF Interventions in Support of Sustainable Forest Management

23. This study is the first Value for Money analysis undertaken by the IEO to assess the impact and global environmental benefits (GEBs) of GEF investments and technical support through sustainable forest management (SFM) interventions. This study assessed the impacts of SFM interventions on environmental and biophysical variables, co-benefits measured in terms of socio-economic indicators, and the estimation of monetary values of ecosystem services based on the principle of natural capital accounting.

24. GEF's contribution to generating environmental and socio-economic benefits, including GEBs, through SFM interventions, has not been independently evaluated in the past, reflecting a gap in understanding the relevance, effectiveness, efficiency and impact of GEF support. Previous studies on SFM within the GEF partnership include an advisory document on SFM, and a report which synthesizes the effectiveness of Community Forest Management initiatives in generating environmental benefits, both produced by STAP.

25. This study had three objectives. The first was to estimate the portfolio-scale impact of GEF interventions in SFM on land cover and associated above-ground carbon storage. The second objective was to use the calculated impacts on land cover to estimate the monetary value of tons of carbon sequestered. The third objective was to examine the socio-economic effects using a portfolio-wide approach (based on the night light activity²), and to focus on a single-country case study, Uganda, by leveraging in-country household survey information.

Background

26. Since its inception, the GEF has provided support to its partner countries to improve the sustainability of their forestry resources. Although SFM is not a focal area, forest-based interventions have been supported through GEF focal area interventions, multifocal projects, integrated approach pilots (IAPs), and, more recently, designed through the Impact Programs. While projects prior to GEF-5 addressed forest issues through several focal area objectives, the GEF initiated a dedicated SFM program in GEF 5. SFM interventions from GEF-5 onwards were funded through an additional incentive, with SFM specific objectives, even though SFM is not a separate focal area per se. With a total investment of approximately \$2.8 billion in grants and an additional \$14 billion in co-financing, SFM interventions have evolved over the GEF phases, with the objective of increasing environmental benefits and delivering socio-economic co-benefits. The environmental and socio-economic co-benefits that may accrue from these SFM related investments have not been assessed so far.

27. In this study, the IEO expanded on the satellite-based approach applied in the value for money analysis of GEF land degradation projects (IEO, 2016) to examine the environmental

² Night lights are used as a proxy for socio-economic growth as studies have demonstrated that night time lights is highly correlated with economic activity, population, and establishment density (Mellander et al. 2015).

effectiveness, efficiency and impact of GEF interventions in SFM. Data used included the geographic locations within which GEF SFM projects are located, and measurements on environmental outcomes based on indicators suggested by the United Nations Convention to Combat Desertification (UNCCD 2015) and Convention on Biological Diversity (CBD 2016). Satellite-based measurements of nighttime lights intensity over time (frequently used as a proxy for socio-economic outcomes) was used in this study. A quasi-experimental approach was applied to analyze the effectiveness of GEF projects and programs along both environmental and socio-economic dimensions, and valuations were estimated based on attributable carbon sequestered by GEF projects.

28. A total of 506 SFM projects were examined including projects from earlier replenishment periods before the GEF initiated a dedicated SFM program in GEF-5; of these, 347 met the two criteria for inclusion: (1) availability of precise geospatial information (less than 10 square kilometers), and (2) a period of implementation that began no later than 2013 (approximately 70 percent of projects). Within these 347 projects, 1,924 project implementation sites were identified with high precision (~5.5 sites per project.)

Findings and conclusions

Regional Focus

29. **The majority of GEF SFM project implementation sites are located in Sub-Saharan Africa, Latin America and the Caribbean.** This trend may not be analogous to funding, as it focuses on identified locations at which projects are implemented. Madagascar, Colombia, and Brazil are the three countries with the largest number of GEF SFM project locations.

Relevance

30. GEF SFM projects in Brazil, East Asia and Madagascar were implemented in geographic locations with very high initial conditions of deforestation. GEF projects were not targeted towards areas that might maximize socio-economic co-benefits, instead preferencing areas that were more likely to improve environmental outcomes.

Effectiveness & Valuation

31. **The GEF SFM interventions³ were estimated to have avoided approximately 4,875 square kilometers of deforestation over their respective implementation periods (an average of 2.5 square kilometers per intervention location).** Combined with improvements in vegetation density, this project cohort contributed additional sequestered above-ground carbon of 1.33 tonnes / hectare / year, worth, on average \$727,990 annually (under a conservative valuation of carbon at \$12.90/MT), compared to locations with no GEF interventions. This estimate is conservative given the fact that not all GEF intervention

³ Subset of project implementation sites that met the inclusion criteria.

locations are known, representing only 1,924 for which more precise geographic information was available. If valuation is extrapolated to cases for which exact geospatial information was not available, but a known site of implementation exists (3,585 intervention locations), the estimate is \$1.36 million/ year, providing a slightly less conservative estimate of impacts. This contrasts to an average implementation cost of \$5.9 million, resulting in a break-even point of 4.5 years if only above-ground biomass is considered in valuation.

Socio-economic Co-benefits

32. **Positive impact on socio-economic benefits.** A portfolio level global-scope analysis of economic and social co-benefits of GEF SFM projects suggests a small, positive impact on socio-economic benefits indicated by nighttime light intensity. Majority of SFM interventions were designed to address multiple focal area objectives, especially after GEF-5. In addition to the carbon sequestered, there is evidence that projects implemented since GEF-5 demonstrated a positive effect on nighttime lights (+0.24), a proxy for economic development, which was not discernible in preceding periods. In the absence of precise geographic information, it is possible that these findings represent an underestimate of the true impacts across the GEF SFM portfolio since locations without any recorded high precision geographic data in project descriptions are not included.

33. **GEF SFM projects are associated with an increase in household assets.** The local-scope case study of Uganda provided more direct estimates of economic impacts, leveraging the World Bank Living Standards Measurement Survey (LSMS) to detect the impact of GEF projects on proximate (within 50 km) households. By matching LSMS locations proximate to GEF interventions to those far away from GEF interventions, the local analysis indicates that GEF SFM projects are associated with an increase in household assets between \$163 and \$353 (within 40-60 km respectively). The Uganda case study shows that households proximate to a GEF implementation site tended to experience improvements in assets approximately \$310 (within 50 km) higher than those not proximate to a GEF implementation site.

34. In summary, the socio-economic co-benefits of GEF interventions have not been evaluated, and this study is a first attempt at estimating the global and local level contributions. The global-scope study suggested a generally neutral impact, with some exceptions; however, the coarse nature of the nighttime lights data used to approximate economic productivity limits the conclusions to areas which experienced large degrees of change. Further, in cases where exceptional increases in nighttime lights were observed, the projects tended to underperform in terms of environmental outcomes – representing a challenging tradeoff between co-benefits and primary benefits and how they are measured. Leveraging local household survey data provided a more direct way to measure how the GEF may be impacting local socio-economic conditions, and the results demonstrate the positive income effects associated with GEF interventions. Taken together, these findings clearly demonstrate the need for clear location information, baseline and monitoring information on environmental and socio-economic outcomes.

Recommendations

35. **Recommendation 1: Improve geographic precision in recording and reporting project locations.** This will allow for robust monitoring and evaluation of progress and results which are directly attributable to the GEF intervention. It will help gather additional information on ecological and socioeconomic changes within the aerial coverage of the GEF intervention. The requirement to collect geolocation in the GEF-7 results architecture is a step in the right direction. However, the geolocation data being collected is not precise. The GEF and partner Agencies should ensure that location information is accurately captured for the site of the intervention. Collection of precise intervention boundaries is optional in the GEF-7 results architecture, but it should be highly encouraged.

36. **Recommendation 2: Capture socio-economic co-benefits of interventions using a spatial approach.** GEF projects generate GEBs and have the ability to generate socio-economic co-benefits. Since GEF is capturing co-benefits through the indicator – number of beneficiaries – using socio-economic indicators which are available will shed more light than focusing on the number of beneficiaries. Project-specific indicators that capture the socio-economic conditions at the baseline and project end should be encouraged to assess both direct and induced co-benefits over time, as well as possible trade-offs. This is specifically relevant for SFM interventions that are now targeted in unique geographies such as the Amazon, the Congo Basin, and the drylands, areas with valuable forests in poor socioeconomic situations.

37. **Recommendation 3: Select projects or programs to improve the evidence base for GEF interventions.** In general, there is limited evidence on the effectiveness, efficiency and impact of various approaches and instruments such as the landscape approaches, certification schemes and payment for ecosystem services included in SFM interventions. Therefore, it is important to gather empirical evidence. The GEF partnership should continue to encourage the adoption of innovative experimental or quasi-experimental design elements in SFM interventions to generate data and improve the evidence base so that impacts can be more conclusively linked to GEF SFM interventions.

C. Evaluation of GEF Support to Scaling Up Impacts

Background

38. **The GEF 2020 Strategy, published in 2014, sets a clear vision to support transformational change, and to achieve global environmental benefits (GEBs) on a larger scale.** It specifically aims to achieve this vision by, among others, supporting innovative activities that “are scalable across multiple countries, regions, and sectors through policy, market, or behavioral transformations”. In part, this was a response to a finding of IEO’s Fifth Overall Performance Study (OPS5) that scaling up had taken place in only 20 percent of projects upon their completion, indicating the need for a longer-term approach to achieving impact at scale.

39. **Scaling up is not new to the GEF and in the last decade, all GEF focal areas have been shifting from site-level pilot projects towards projects or programs implemented at higher scales.** Based on a review of focal area strategies and interviews with the GEF partnership, the GEF has gradually shifted its focus from pilots to scaled-up interventions over the last 25 years. In part, this is because the GEF partnership has built up a much better understanding of what interventions work based on the portfolio of demonstration projects implemented during GEF's early phases. As a more targeted response to the need to achieve impact at scale, the GEF introduced the Integrated Approach Pilots in GEF-6 and the Impact Programs in GEF-7, which have just begun implementation. However, the conditions under which scaling up has been successful or unsuccessful, and the processes by which impacts are scaled up, have not been systematically assessed. In addition, based on interview responses, there appears to be a varied understanding of scaling up across the partnership and how it is achieved in operational terms.

40. **This evaluation draws on the previous experiences of the GEF in scaling up to better understand the processes through which scaling up occurs and the conditions under which it is effectively achieved.** The IEO has been tracking scaling up as one indicator of progress towards impact, reporting its prevalence in the GEF portfolio in the overall performance studies. Moreover, recent evaluations contributing to OPS6, such as those on transformational change and GEF's support for legal and regulatory frameworks, note the importance of the scaling up process in achieving larger-scale impact. This is the first evaluation to systematically assess the scaling up process in depth, and the influencing factors and conditions. Using a purposive sampling approach, the evaluation conducted quantitative and qualitative analyses on both successful and less successful cases of GEF support to scaling up. Information was extracted from document reviews, interviews, and field visits to three countries. The evaluation provides lessons for the GEF in future support for scaling up throughout its portfolio, and for the GEF-7 Impact Programs in particular.

Conclusions

1. The GEF 2020 strategy and the programming directions set a clear vision and goal to scale up Global Environmental Benefits (GEBs). This has translated into a shift towards the Integrated Approach Pilots and Impact Programs to achieve impacts at scale, but the operational guidance is not consistently clear across all programs and projects.

41. Both the GEF 2020 Strategy and the GEF-7 Programming Directions set a clear vision and goal to scale up GEBs. The GEF's focus on scaling is more explicit compared to many other international development institutions, and clearly indicates support for the enabling conditions necessary for impacts to be scaled up. But like other institutions, the GEF's vision for scaling up is not consistently clear in the operational guidance across all programs and the GEF portfolio.

42. During project and program design, guidelines are absent on how interventions are expected to scale up outcomes. While technically sound, almost half of the approved GEF-7 projects do not clearly articulate concrete links between their activities, outcomes, the scaling up process and resulting impacts, even though they have a long-term scaling outlook.

2. In cases where the GEF has supported scaling up, it uses multiple modes such as replication, mainstreaming and linking, to scale up interventions that generate global environmental benefits, drawing on the comparative advantages of the members of the GEF partnership.

43. The GEF contributes to scaling up efforts by helping replicate, mainstream and link interventions that generate GEBs. Replication refers to the implementation of the same intervention multiple times by increasing numbers of stakeholders and/or covering larger areas, typically by leveraging finance, knowledge, and policy. Mainstreaming involves the integration of an intervention's implementation within an institution's regular operations, usually through a policy or legal framework. Linking refers to the implementation of different types of interventions across multiple geographic locations, administrative levels, or sectors and institutions that comprise the different components of an ecological, economic, or governance system. All three modes of scaling up are often interdependent processes that may take place through one or more projects—whether in parallel or in sequence—that all contribute to generating a specific impact at a target scale.

44. Multilateral development banks (MDBs) such as the World Bank provide larger amounts of funding through loans, and typically scale up through replication. Other GEF Agencies with more limited funding, such as UN agencies and international NGOs, are shifting more towards linking through partnership-building across multiple sectors to leverage the comparative advantages of other institutions. All GEF Agencies contribute to scaling up through mainstreaming.

3. The extent of GEF support to scaling up and the rate at which outcomes are scaled up vary across focal areas, but typically take place over more than 5 years, and generate higher outcomes per GEF dollar per year, during the scaling up stage as compared with the pilot stage. Indicators used between the pilot and scaling up stage were not always consistent, limiting the tracking of progress.

45. GEF support for scaling up processes ranged from grants of less than \$1 million to grants over \$100 million, with the period of GEF support ranging from less than 5 years to over 25 years. Typically, GEF support for scaling was provided for more than 5 years, or through more than one project, and was delivered through a variety of modalities including enabling activities, SGP projects, and medium-sized and full-sized projects.

46. Within cases where GEF support for piloting and scaling up stages could clearly be distinguished from project documents, measurable outcomes per dollar per year during the scaling up stage were between 1.1 to 74.5 times larger than during the pilot stage, indicative of achieving greater cost-effectiveness, and higher co-financing leveraged for scaling activities per GEF dollar. Outcomes were derived from project evaluations, and do not reflect scaled-up outcomes which were catalyzed by GEF support, including at least 40 percent of the cases where scaling up activities have been continued by other donors and institutions.

47. The GEF's results framework provides corporate targets for GEBs for the current replenishment period. These targets are not set or tracked relative to the specific spatial and temporal scales of the environmental issue that needs to be addressed, but to the amount of funding available for a project, program or replenishment period. This limits the ability of the GEF from assessing its progress relative the full magnitude and scope of the environmental problems it aims to address. Linked projects that contribute to the same scaling up target do not consistently use the same indicators or even units of measurement, making it difficult to track progress towards their specific environmental targets. The core indicators will address this to some extent, but projects often track other indicators as well, which are not consistent across linked projects.

4. GEF has supported scaling up by establishing enabling conditions, choosing the appropriate influencers and institutions to work with, and leveraging contextual conditions at the right time.

48. GEF funding was found to support eight types of enabling conditions that contribute to the scaling up process: 1) knowledge and information dissemination, 2) participatory processes, and 3) incentives and disincentives to motivate adoption of interventions; 4) institutional and individual capacities, 5) policy framework and operating guidelines, and 6) sustainable financing to allow sustained support for scaling; and 7) multi-stakeholder interactions and partnerships, and 8) systematic learning mechanisms to allow the scaling up process to be adaptable and cost-effective in the face of changing contextual conditions.

49. GEF support was most commonly used to support incentives and knowledge and information initiatives which increased the willingness of stakeholders to adopt interventions that generated GEBs and helped gain the support of influential persons and institutions to make scaling a political priority. In all cases assessed, GEF support was also used to strengthen institutional and individual capacities for scaling up interventions. Both support for capacities and sustainable sources of financing allowed scaling up activities to be sustained beyond GEF funding in the observed cases. However, these sustainable funding sources are subject to risks from changes in political and economic conditions.

50. In addition to supporting the appropriate enabling conditions, GEF support also contributed to scaling up by choosing the right influencers and institutions to work with, such as technically competent champions; individuals, government agencies and donor organizations with political and economic traction and a long-term scaling outlook; and long-term structures with wide geographic reach and implementation experience, continuity in staff, and opportunities for frequent local and global interaction. In some cases, GEF support facilitated scaling up by leveraging contextual conditions—such as existing legal obligations and political priorities, external events, and shifts in the political landscape—at the right time to align with scaling up objectives.

5. GEF support has catalyzed the scaling up process by de-risking innovations and demonstrating project benefits at the pilot stage. Systematic learning mechanisms for scaling

up were not supported by the GEF in most of the earlier closed projects, but about half of the approved GEF-7 projects address learning more systematically.

51. GEF support contributes to scaling up by demonstrating the benefits of effective interventions in specific contexts and helps to establish the enabling conditions to scale up these benefits in larger contexts. GEF and other institutions' support for scaling was frequently contingent on the positive results of the pilot stage, indicative of a long-term scaling outlook anchored on adaptive learning. According to interviews, the GEF's comparative advantage lies in de-risking investments by piloting interventions that neither the public nor private sector is willing to fund and where no clear benefits have been demonstrated. Another comparative advantage is GEF's flexible grants, which attract more funding from government and other donors for scaling activities. Systematic learning allows projects and programs to leverage the right contextual conditions at the right time to align with scaling objectives. GEF funding was found to be least frequently used to establish systematic learning mechanisms in completed projects, where learning was more on an ad hoc basis. On the other hand, slightly more than half of GEF-7 projects include a budget and details on systematic learning mechanisms, which should be able to provide timely guidance on scaling up.

Recommendation

The GEF partnership needs to ensure that factors influencing scaling up are identified and taken into account in program and project design and implementation, and their impact assessed at midterm and terminal evaluations.

52. A program or project should identify its contributions to the scaling up process, such as through its support for the appropriate enabling conditions, particularly systematic learning mechanisms, and addressing contextual factors that affect scaling up. While this evaluation found successful cases of scaling up in the absence of these guidelines, guidance may systematically increase the likelihood of outcomes being scaled up during and beyond project or program implementation, in line with the GEF's vision. The expectation is not for all GEF projects to achieve impact at scale, but to clearly articulate how each project contributes to the long-term vision for achieving results at larger scale.

53. Projects and programs implemented in parallel or in sequence that are explicitly linked by design must have common environmental indicators that use the same units of measurement to allow outcomes to be aggregated, and progress to be tracked. The GEF's current results framework provides common indicators which makes this possible at the portfolio level; but linked projects and programs must use common units of measurement and indicators for specific outcomes that are not tracked by the GEF's core indicators and sub-indicators.

II. EVALUATION WORK IN PROGRESS

A. Strategic Country Cluster Evaluations: LDCs, SIDS and African Biomes

54. The Strategic Country Cluster Evaluations (SCCEs) focus on common themes across clusters of countries and/or portfolios involving a critical mass of projects and experience with GEF programming. Three SCCEs are currently ongoing, further discussed in the following paragraphs, including (1) the African biomes SCCE, (2) the least developed countries (LDCs) SCCE, and (3) the small island developing states (SIDS) SCCE. The three SCCEs are designed around the same conceptual analysis framework to enable comparing findings across geographic regions and/or portfolios. The two overarching objectives for all three SCCEs are:

- (a) To assess the relevance of the GEF towards the target countries' main environmental challenges, from the countries' perspective, and
- (b) To provide a deeper understanding of the outcomes and the determinants of sustainability of the outcomes of GEF support in the SCCEs' target countries.

Gender, resilience and fragility of the operational context, and engagement with the private sector will be assessed as crosscutting issues in the three SCCEs.

55. The African biomes SCCE covers 23 countries that are situated in two Sub-Saharan Africa biomes, being the Sahel and the Sudan-Guinea Savanna. Countries in Africa's Sahel and Sudan-Guinea Savanna biomes face complex environmental challenges, the most common of which are deforestation, land degradation, desertification, and biodiversity loss. These challenges are compounded by the pressing socio-economic needs of a rapidly growing population.

56. The LDCs SCCE covers all 47 LDCs, located in Africa, Asia, and the Caribbean. Selection of the LDCs for an SCCE is based on the countries' common LDC status and related economic, social and environmental challenges. LDCs are low-income countries confronting severe structural impediments to sustainable development. They are highly vulnerable to economic and environmental shocks and almost half of the LDCs are countries in fragile situations.

57. The SIDS SCCE covers 39 small island developing states in the AIMS (Atlantic, Indian Ocean, Mediterranean and South China Sea), Caribbean, and Pacific regions. The choice to evaluate the SIDS as a strategic cluster is based on their shared geophysical constraints, resulting in disproportionately large economic, social and environmental challenges, and is supported by Council members' requests for a more in-depth reviewing of the SIDS portfolio of projects.

58. Country case studies are currently being conducted for all three SCCEs. Evaluation teams have started working in Guinea, Mali, Nigeria and Uganda for the African biomes SCCE (Mauritania will be conducted in July); Bhutan, Cambodia, Mozambique and Tanzania for the LDCs SCCE; and Belize, Comoros, Dominican Republic, Guinea-Bissau, Jamaica, Kiribati, and Vanuatu for the SIDS SCCE (Maldives, Mauritius and St. Lucia will be conducted in July). The Guinea, Mali, Mauritania and Uganda country case studies cover both the African Biomes and LDCs SCCEs; the Comoros, Kiribati and Vanuatu country case studies cover both the SIDS and LDCs SCCEs; and the Guinea-Bissau country case study covers all three SCCEs. A small sample of completed and ongoing projects is being reviewed in these countries, purposively selected

based on the aggregate portfolio analysis, geospatial analysis and review of project and program documents. The focus of the SCCE case studies is to deep-dive into the main hindering and/or contributing factors – either project or context related – to sustainability and performance of GEF interventions in tackling the main environmental challenges countries face. Main findings, conclusions and recommendations of these three evaluations will be presented to the Council at the December 2019 meeting

B. Evaluation of GEF Engagement in Fragile and Conflict-affected Situations

59. More than one-third of the GEF's portfolio since 1992 has funded projects in conflict-affected countries. Despite the breadth and extent of its investments in conflict-affected countries, and the potential risks to projects posed by the fluid and volatile environments in many of these countries, there are no established procedures to account for the conflict context when designing, reviewing, or implementing GEF projects. In 2018, the Scientific and Technical Advisory Panel (STAP) produced a report highlighting this gap. The STAP report recommended that the GEF explicitly address environmental security in its project design and implementation and more comprehensively integrate conflict considerations in line with practices of other international institutions. For example, a review of African Development Bank (AfDB) projects in conflict-affected countries found that there was no consideration of the conflict context in the design or implementation of the projects, and that this failure compromised the ability of many projects to meet their stated objectives. The AfDB subsequently started using a conflict "lens" and developed a flagship report guiding staff and partners on how to design and implement natural resource projects in a conflict-sensitive manner. No such tools currently exist for GEF projects.

60. This evaluation examines conflict sensitivity in GEF project design and implementation. Based on an assessment of GEF projects in conflict-affected settings, the evaluation will consider the extent to which GEF projects in conflict-affected countries considered the conflict context in their design and implementation, factors that influenced whether the project proponents considered (or did not consider) the conflict context, and the implications of considering (or not considering) the conflict context in designing and implementing GEF projects on the stated objectives of the projects. The approach paper of the evaluation is currently being drafted and will be approved by July 2019. The evaluation will draw primarily upon project identification forms (PIFs), project proposals, midterm reviews, terminal evaluations, and interviews with project staff, partners, and relevant stakeholders. Ongoing portfolio analysis and documentation review will be completed in August 2019. The portfolio analysis will enable country selection for in-depth case studies which will be conducted in fall 2019. The evaluation report will be presented to the Council in June 2020.

C. Evaluation of GEF Support to Sustainable Forest Management (SFM)

61. The main purpose of the evaluation is to provide insights and lessons on the GEF support for future forest-related interventions, based on evidence from an analysis of SFM and Reducing Emissions from Deforestation and Forest Degradation (REDD+) interventions supported by the GEF. The study will employ a mixed-methods approach. As part of this

evaluation, a framework to evaluate socio-economic benefits of SFM projects will be developed and applied. A value-for-money analysis of GEF support to SFM interventions is being presented at this June 2019 Council meeting and will inform this evaluation. This SFM evaluation is currently being designed and will address the relevance, effectiveness, results, and impacts of SFM/REDD+ initiatives, and synthesize the results and progress towards impact of SFM/REDD+ projects. It will also include evaluating the multiple benefits and co-benefits from SFM interventions; identification of good practices and lessons from SFM and REDD+ initiatives; appraise the approach of the GEF partnership towards SFM/REDD+, and evaluate the role and contribution of the private sector in forestry/ SFM. The final report will be presented to the GEF Council in 2020.

D. Evaluation of GEF Medium-Sized Projects

62. The GEF Medium-Sized Project (MSP) modality has provided an expedited mechanism allowing a broader representation of stakeholders to directly access GEF funds, including government agencies, international NGOs, national NGOs, academic and research institutions, and private sector companies. The objective of the MSP modality is to promote rapid and efficient execution of smaller projects by simplifying processing steps together with review and approval procedures and shortening the project cycle relative to GEF full-sized projects. This evaluation will provide evidence on the past GEF experience in designing and implementing MSPs as well as the effectiveness and results of MSP projects. It will contribute to understanding the role of MSPs in the context of GEF's strategic move to integrated programming to tackle the main drivers of environmental degradation. The evaluation will be presented to Council in Spring 2020.

E. GEF Support for Innovation: Findings and Lessons from GEF interventions.

63. The purpose of this study is to understand the process of promoting innovation for global environmental benefits through GEF interventions. Since the GEF's inception in 1991, there has been an expectation that GEF would support innovative technologies and approaches and would help address barriers to their adoption at scale. More recently, the GEF 2020 vision, as well as the GEF-7 Programming Directions have emphasized support for innovation as a priority for the partnership to address global environmental challenges. The GEF has a history of promoting frontier environmental approaches and technologies, however, as evidenced by a recent IEO paper, An Evaluative Approach to Assessing Additionality (GEF/ME/C.55/Inf.01), only a small number of projects (19 percent) consider innovation as an area of their additionality. While previous evaluations, including Overall Performance Studies, examined innovative investments of the GEF, there has been no systematic assessment of GEF experience in fostering innovation. This study will develop a framework for understanding the factors and conditions that influence innovation in GEF-supported projects and programs. The study will draw on lessons from the scientific and development literature, key informant interviews, portfolio and case study analysis. The final report will be presented to the Council at the spring 2020 meeting.

F. Knowledge Management

64. During the reporting period, IEO staff have contributed to a publication on evaluative evidence of scaling up the Sustainable Development Goals.⁴ IEO staff have presented at international and regional conferences, including the Asia Pacific Evaluation Conference (February 2019), 9th African Evaluation Association (AfrEA) International Conference (March 2019), Evaluation in difficult contexts and hard-to-reach areas conference organized by the European Commission's Directorate-General for International Cooperation and Development (DG DEVCO) (March 2019), the 2019 American Association of Geographers (AAG) Annual Meeting (April 2019) and the UN Evaluation Practice Exchange (May 2019).

65. As part of our efforts to share evaluative evidence with country stakeholders, the IEO has also presented at the Expanded Constituency Workshops. The IEO session engages the GEF country focal points, national convention focal points, staff of GEF Agencies and civil society organizations and discusses recent evaluation findings in relation to participants' work in the region. In addition to highlighting factors affecting performance and impact of GEF-supported interventions, the session includes an interactive exercise to delve into the factors that affect sustainability of project outcomes. The focus on sustainability is appropriate given the importance of the topic for the partnership and to better understand the risks to continuation of benefits of GEF projects. The session also demonstrates to participants how to independently access evaluation performance data in relation to their country, region, and GEF portfolio from the IEO website.

66. The IEO has maintained strategic partnerships for knowledge exchange on methodologies and approaches with the Evaluation Cooperation Group of the international financial institutions (ECG), the United Nations Evaluation Group (UNEG), and the learning partnership on transformational change led by the Climate Investment Funds (CIF). Among other activities, IEO has engaged with the UNEG Interest Group on Evaluation Use and contributed to a compilation of good practices pertinent to evaluation use.

67. The IEO has been hosting Climate-Eval, a community of practice on the evaluation of climate change and development since 2008. This initiative is aimed at establishing a virtual network in which practitioners active in climate change, environmental and development evaluation can exchange, access, and solicit current information related to effective evaluation practices in this rapidly evolving field. Consistent with the broader scope of GEF's work, Climate-Eval was renamed Earth-Eval in late 2017. Earth-Eval contributes to building capacity among evaluation practitioners through the identification of best practices and lessons learned, and the development of indicators and guidelines for climate change projects and programs.

68. Earth-Eval continues to expand its outreach by collaborating with other evaluation units of organizations, associations and academic think tanks on blogs, conferences and other joint ventures. The IEO and Earth-Eval Community of Practice will organize the Third International

⁴ Uitto, J., Naidoo, I., 2019. Local, National, Global: Evaluative Evidence of Scaling up the SDGs. American Association of Geographers. Annual Meeting, Washington, DC, April 3, 2019;

Conference on Evaluating Environment and Development in collaboration with the IDEAS Global Assembly from October 3-4, 2019 in Prague, Czech Republic. The Third International Conference follows two renowned international conferences in 2008 and 2014 that focused on climate change and development. The Third Conference will broaden its coverage to sustainable development from the perspective of natural and human systems, evaluating the social and economic benefits and trade-offs associated with environmental interventions.

69. The Third Conference will bring to the Prague Assembly leading practitioners and thinkers on environmental evaluation from international and national public organizations in the North and the South, the academic community, environmental organizations and thinktanks, civil society and the private sector. The participants will be encouraged to share their concrete experiences with environmental interventions and their evaluations on various environmental topics, including natural resources management, biodiversity conservation, land degradation, sustainable forestry, water management, as well as climate change mitigation, adaptation and carbon sequestration interventions. The specific themes for the Third International Conference will include, but not be limited to: (1) Transformative change towards environmental sustainability; (2) Innovation related to environment and climate change programs; (3) Climate change adaptation; (4) Climate, environment, fragility and conflict; and (5) Big data, indicators, and geospatial tools.

70. The IEO website includes up-to-date information on evaluations, events, methods and other products. In FY19, a total of 149 evaluations were available for users to download or share across social media channels and various platforms. IEO events have contributed to new users accessing presentations and videos on the website. The interactive data and ratings section displays the latest performance ratings of completed GEF projects based on evidence from the terminal evaluations. This section is demonstrated at GEF Expanded Constituency Workshops to inform stakeholders on performance ratings and provides access to download datasets.

III. THE MANAGEMENT ACTION RECORD

71. The GEF Management Action Record (MAR) tracks the level of adoption of GEF Council decisions which are based on the IEO's evaluation recommendations. These recommendations are implemented by the GEF Secretariat and/or the GEF Partner Agencies (together referred to as GEF Management). The MAR serves two purposes: (1) to provide the GEF Council with a record of its decisions based on the evaluation reports presented by the GEF IEO, the proposed management actions, and the actual status of these actions; and (2) to increase the accountability of GEF Management regarding Council decisions on monitoring and evaluation issues.⁵

⁵ GEF Council, "Procedures and Format of the GEF Management Action Record." GEF/ME/C.27/3., GEF Council November, 2005.

72. The MAR 2018 reports on the level of adoption of decisions based on recommendations of seven IEO evaluations. Five of these evaluations which account for 12 recommendations were endorsed by the GEF Council, and the remainder were endorsed by the LDCF and SCCF Council. The evaluations are:

- (a) Joint GEF-UNDP Small Grants Programme Evaluation (GEF/ME/C.48/02) reported in Semi-Annual Evaluation Report June 2015 (GEF/ME/C.48/02)
- (b) Evaluation of the GEF CSO Network (GEF/ME/C.50/02)
- (c) Annual Performance Report 2015 (GEF/ME/C.50/04)
- (d) Review of GEF's Engagement with Indigenous Peoples (GEF/ME/C.53/Inf.07) reported in Semi Annual Evaluation Report of the GEF IEO November 2017 (GEF/ME/C.53/01)
- (e) Review of the GEF Policy on Minimum Standards on Environmental and Social Safeguards (GEF/ME/C.52/Inf.08) reported in Semi Annual Evaluation Report of the GEF IEO May 2017 (GEF/ME/C.52/01/Rev.02)
- (f) Program Evaluation of the Least Developed Countries Fund (GEF/LDCF.SCCF.20/ME/02)
- (g) Program Evaluation of the Special Climate Change Fund (GEF/LDCF.SCCF.22/ME/02)

73. Of the five evaluations where IEO recommendations were endorsed by the GEF Council, the IEO assessment is consistent with management's assessment on four evaluations. For three of these – Evaluation of the GEF CSO Network, Review of GEF's Engagement with Indigenous Peoples, and Review of the GEF Policy on Minimum Standards on Environmental and Social Safeguards – the IEO and management rated the level of adoption of the recommendations to be substantial. The IEO's assessment also agrees with the management's assessment on the level of adoption of the decision based on the Joint GEF - UNDP Small Grant Programme Evaluation. The Council's decision had called for reconsideration of the criteria for upgrading countries. While Malaysia was upgraded during the reporting period, the criteria has remained unchanged for GEF-7 period. Therefore, both IEO and the management assessed the level of adoption to be medium.

74. There was a slight disagreement in the adoption rating in only one case. Management assessed the level of adoption of the Council's decision on the Annual Performance Report 2015, which called for the tracking tools be simplified and the reporting burden on Agencies be reduced, to be high. Management assessed the adoption to be high because only eleven core indicators will be tracked during GEF-7 and the tracking tools have been streamlined, particularly the tracking tool to assess Protected Area Management Effectiveness. IEO assesses the adoption to be substantial, rather than high, acknowledging that the protected area tool has been simplified to reduce the reporting burden, but some burden nonetheless still exists. This recommendation is being graduated.

75. IEO and Management assessed the adoption of the decisions pertaining to program evaluations LDCF and SCCF as substantial.