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EVALUATION OF THE ACCREDITATION PROCESS FOR EXPANSION OF THE GEF PARTNERSHIP

TABLE OF CONTENTS

Executive Summary	iii
Background	1
Evolution of GEF Approach to Accreditation	2
Early Expansion	2
GEF-5 Replenishment Negotiations.....	3
Development of the GEF Approach to Broadening.....	4
Council Approval for Key Measures	5
The GEF Accreditation Process	6
Progress Thus Far.....	7
Objectives, Key Questions and Methodology	9
Objectives of the Broadening.....	9
Key Questions	9
Evaluation Approach.....	10
Limitations	12
Evaluation Team and Duration	12
Consultations with stakeholders.....	12
Findings.....	12
Early Results	12
Expansion of Choices for Recipient Countries.....	13
Expansion of Knowledge and Networks	14
Project Agency experience compared to their expectations.....	15
Design of the Accreditation Process	15
Stage 1: Value-added Review.....	17
Stage 2: Accreditation Panel Review	18
Independence of the Accreditation Process	19
Implementation of the Accreditation Process	20
Outreach.....	20
Pre-Application Submission Processes at Applicant Entities.....	21
Stage-1: Value-added Panel Review	22
Stage 2: Accreditation Panel Review	23

Stage 3: FPA and MoU.....	25
Communications.....	27
Transparency and Fairness.....	29
Criteria and Procedures	29
Implementation.....	30
Onboarding of new Agencies	31
Cost of Accreditation Process	33
Long term business case	36
Lessons	37
Annex 1: List of Respondents.....	42
Annex 2: Council Sub-committee and Task Force Discussions	45
Annex 3: Interview Protocols	50

EXECUTIVE SUMMARY

1. The GEF Council, in its November 2010 meeting, decided that the GEF will initiate an accreditation process for broadening of the GEF partnership. After development and approval of the criteria, standards, and procedures, for the accreditation process the Secretariat issued a call for applications in November 2011. It was expected that during GEF-5, 10 applicants will be included in the GEF partnership as Project Agencies. In comparison, only two applicants were included during GEF-5. By October 2015 four applicants had been included, and another applicant had completed the Stage 2 of the accreditation process.

2. The ‘Evaluation of the Accreditation Process for Expansion of the GEF Partnership’ is being undertaken at the Council’s request. The key questions of the evaluation are:

- (a) To what extent is the accreditation process designed to achieve its intended purpose?
- (b) To what extent has the accreditation process been efficient?
- (c) To what extent is the accreditation process fair and transparent?
- (d) What are the early results of the accreditation process?
- (e) What lessons have emerged from the GEF’s experience on accreditation?

3. The evaluation drew on interviews of key stakeholders and experts, review of the documents on the procedures and rules for accreditation, and review of the correspondence between the Secretariat and the applicants. It also drew on the application materials submitted by the Agencies and the assessments prepared by the Value-added Review Panel and the Accreditation Panel. For most questions, information was available from several sources, which helped in identifying points of agreement and points where perspectives differed based on the type of information source or individual experience. The draft report of the evaluation was shared with the GEF stakeholders and their feedback has been taken into account in finalizing the report. The evaluation has the following conclusions:

- (a) **Conclusion 1:** *Early results of broadening the GEF partnership indicate that expanding the choices of recipient countries has provided the GEF access to new expertise and networks. Project Agencies report having gained from the accreditation process through improvements in their systems and standards. While the new Project Agencies in the GEF partnership have put additional demands on the Secretariat, such demands are expected to decline once these agencies gain more experience.*
- (b) **Conclusion 2:** *The accreditation process is designed to identify agencies that are in compliance with the GEF fiduciary standards, environmental and social safeguards, and gender mainstreaming policy, and that add value to the GEF partnership. However, some aspects of the original policy design slowed the accreditation process.*

- (c) **Conclusion 3:** *Sufficient arrangements are in place to ensure that the Accreditation Panel is functionally and behaviorally independent, adding to the credibility of the process. There is room for further strengthening of the checks and balances in the accreditation process.*
- (d) **Conclusion 4:** *Implementation of the accreditation process has been slower than expected primarily because of the high level of accreditation standards and design issues that became apparent during implementation. Overall the implementation of process was satisfactory, although there were some inefficiencies in implementation.*
- (e) **Conclusion 5:** *The accreditation process is seen as having been designed transparently. The manner in which it has been implemented has also been largely transparent. However, there are some areas where the process is perceived as having been unfair by the applicants.*
- (f) **Conclusion 6:** *The accreditation process has so far been costlier than expected. Applicants incurred much higher costs than the accreditation fees, and the cost incurred by the GEF has been substantially higher than that recovered through fees. Some of the cost recovery–related rules established during design added to delays.*

4. The purpose of the GEF Accreditation Pilot was to generate lessons that may shape future GEF approach to broadening its partnership. The experience so far has indeed generated several lessons and has fostered learning across and beyond those involved in the GEF accreditation process.

5. The GEF should consider the pros and cons of whether the accreditation process needs to be calibrated further to take into account the characteristics of the applicant organizations, without compromising GEF requirements. At a finer scale level, the criteria and questions for accreditation need to be better defined and articulated, and the expected performance thresholds of the ratings need to be specified. Other areas for improvement include rethinking the approach to recovery of accreditation costs and giving more attention to face-to-face interaction between the Accreditation Panel and applicants.

BACKGROUND

1. In November 2010, based on the recommendations presented in the paper, '*Broadening of the GEF Partnership under Paragraph 28 of the GEF Instrument: Key Policy Issues*',¹ the GEF Council decided that the GEF will initiate an accreditation process for broadening of the GEF partnership. The Council also instructed the Evaluation Office to initiate an evaluation of the accreditation pilot at the earlier of two milestones: (a) two years after the first five agencies have been accredited or (b) January 2015. The aim of the proposed evaluation was to help the Council decide whether to continue accrediting GEF Project Agencies and whether or how the accreditation policies and procedures should be amended.²

2. The accreditation process started in November 2011. However, by January 2013 none of the applicants had fully completed the accreditation process and the conditions for the first trigger would not have been met any time before January 2015. Therefore, the second trigger was applicable to determine the start of the evaluation. In its October 2014 progress report on the pilot on accreditation, the GEF Secretariat requested the Council to consider postponing the start of the evaluation to October 2016, because it would be too early to learn about the effects of the expansion of the GEF partnership. The Council agreed that it is early to assess these effects, but felt that an evaluation focused on the accreditation process would still be useful. The Council therefore requested the IEO to undertake an evaluation of the GEF accreditation process, to be presented at the June 2015 meeting.³

3. The evaluation of the GEF accreditation process is being undertaken by the GEF IEO to respond to the Council's request. Given the revised mandate, the focus of this evaluation is on accreditation process. The key questions of the evaluation are:

- (a) To what extent is the accreditation process designed to achieve its intended purpose?
- (b) To what extent is the accreditation process fair and transparent?
- (c) To what extent has the accreditation process been efficient from the perspective of different stakeholders?
- (d) What are the early results of the accreditation process?
- (e) What lessons have emerged from the GEF's experience on accreditation?

4. The GEF IEO started preparatory work on the evaluation in November 2014. It started meeting some of the key stakeholders in December 2014. A draft approach paper was shared with the stakeholders on 26th of January 2015 to get their feedback. The feedback thus received was reflected in the revised approach to the evaluation. The preliminary findings of the evaluation were shared in an interagency meeting on April 16th 2015. This draft report of the evaluation was shared with the stakeholders to get their feedback on the evidence and analysis

¹ GEF/C.39/7/Rev.2

² GEF/C.40/09. Broadening of the GEF Partnership under Paragraph 28 of the GEF Instrument. 2011.
http://www.thegef.org/gef/sites/thegef.org/files/documents/C.40.09_Broadening_the_GEF_Partnership.04_26_11.pdf

³ Decision on Agenda Item 11 Progress Report on the Pilot Accreditation of GEF Project Agencies & Timeline for Further Discussion of Accreditation. **Joint Summary of the Chairs, October 28–30, 2014. October 2014**

presented in the draft report. This report takes into account the feedback received from the GEF stakeholders through this process.

EVOLUTION OF GEF APPROACH TO ACCREDITATION

Early Expansion

5. The GEF was established in 1991 as a pilot program in the World Bank to address global environmental issues. GEF implemented its activities through three agencies – the World Bank, UNDP and UNEP. The three agencies had specific roles assigned to them based on their comparative advantage. World Bank’s role was to develop and implement investment projects; UNDP’s to undertake capacity building and pre-investment projects; and, UNEP to take lead in research projects. The initial roles of these agencies in preparing and implementing GEF activities conformed to their acknowledged comparative advantages.⁴

6. In 1994, the GEF was restructured to become a permanent and separate institution. Several other multilateral development banks and UN organizations had started participating in GEF projects as executing agencies. There was an increasing demand for increasing their role in the partnership. As early as 1994, the World Bank had started engaging with the four regional development banks for more formal collaboration for GEF activities (GEF/C.2/inf.2). From 1999 to 2003 seven other multilateral organizations were added to the GEF partnership as Executing Agencies in a phased manner and these progressively gained direct access to GEF resources. The key objectives for this round of expansion were to provide more choices to the recipient countries, bring new expertise and networks to the GEF partnership and to tap additional co-financing sources (GEF/C.13/3). Before bringing these agencies onboard, a GEF Secretariat panel conducted an institutional review. The panel visited the new agencies for verification, which focused on assessing the fiduciary standards that were in place in the agencies, their project pipeline, and their ideas on new projects.

7. The GEF IEO “Evaluation of the Experience of Executing Agencies under Expanded Opportunities in the GEF” (GEF/ME/C.30/4), which assessed the performance of the GEF partnerships expansion beyond the three original agencies, was presented to the GEF Council in December 2006. The evaluation concluded that even though the new agencies were at par with the international standards in terms of technical quality of the their proposals and their ability to raise co-financing, they faced structural challenges due to absence of a level playing field. In the same Council meeting, after discussing the document “Roles and Comparative Advantages of the GEF Agencies” (GEF/C.30/9), the Council decided to abolish the corporate budget for the three original Agencies and establish a level playing field for all the GEF Agencies.⁵ With inclusion and subsequent establishment of a level playing field, increasingly the relationship among the Agencies became more competitive. While space for the new Agencies increased, the space provided by the original partnership design to the World Bank, which till that point had the largest share of GEF funding, decreased.⁶ GEF’s implementation of a resource allocation framework in 2006 led to greater country coverage through GEF funded activities but it also led

⁴ Global Environment Facility – Independent Evaluation of the Pilot Phase. 1994. IEG, World Bank.

⁵ Joint Summary of Chairs – GEF Council Meeting. December 2006.

⁶ The World Bank Group’s Partnership with the Global Environment Facility, Vol. 1: Main Report, 2013, pg. 20

to fragmentation of resources. This created more space for agencies that could implement smaller projects.⁷

GEF-5 Replenishment Negotiations

8. Broadening the GEF partnership was an important topic for discussion during the GEF-5 replenishment negotiations. During the first meeting of the GEF-5 replenishment participants in March 2009, the issue of broadening of the GEF partnership beyond the 10 GEF Agencies was discussed. The replenishment participants asked the Secretariat to prepare a paper on ‘broadened access to GEF resources’.⁸ During the second meeting of the replenishment participants the Secretariat presented a paper on ‘*Draft GEF Policy on Institution and Governance Reforms*’ (GEF/R.5/15).⁹ The paper made a case for further broadening of the partnership: to increase choices for countries and to increase competition among agencies; to respond to the increase in the scope of the GEF mandate; to get access to agencies with diverse strengths and capabilities; and, for increased country ownership. ‘*Policy Recommendations for the Fifth Replenishment of the GEF Trust Fund*’ (GEF/R.5/32/CRP.1) were finalized in the sixth meeting of the replenishment participants.¹⁰ The recommendations called for Secretariat to prepare a proposal for Council review in June 2010 on the broadening of the GEF partnership.

9. Several contextual factors also led to broadening of the GEF partnership become an important area for governance reforms. The international community was giving increased attention to building capacities of the national institutions and called for reliance on them for undertaking development activities. For example, the Paris Declaration on Aid Effectiveness (2005) and Accra Agenda for Action (2008) called for a greater role of national institutions. At the time the GEF-5 replenishment was being negotiated, negotiations for the Copenhagen Accord were also underway. The Accord, which was signed in December 2009, called for the establishment of the Green Climate Fund and it also emphasized reliance on national institutions.¹¹ It was believed that in two decades of GEF operations, the capacities of other organizations, including national organizations, had also significantly increased and several of them were in a position to work effectively as GEF Agencies. It is difficult to determine the extent to which these factors shaped the GEF-5 replenishment negotiations; nonetheless it is clear that these factors underscored the need for GEF to broaden its partnership.

10. Several internal factors made broadening of the GEF partnership a viable option. The GEF-5 replenishment participants assessed that the existing partnership of the 10 GEF Agencies was not sufficient to address the GEF’s work on chemicals, climate change mitigation and adaptation, and sustainable forest management (GEF/R.5/15). The GEF Secretariat management felt that with the advent of the resource allocation framework, there was a service gap for countries that had relatively small GEF Country allocations. From FY 2008 onwards a flat Agency fee rate for project implementation was put in place to ensure a level playing field.¹² Although the adoption of a flat fee rate approach reduced overall Agency fees, it also affected

⁷ Mid Term Evaluation of the System for Transparent Allocation of Resources. September 2014. GEF IEO.

⁸ Summary of the Co-Chairs, First Meeting of the Fifth Replenishment of Resources for the GEF Trust Fund, March 17-18, 2009. http://www.thegef.org/gef/sites/thegef.org/files/documents/GEF.05.first_meetingChair.Summary.pdf

⁹ GEF/R.5/15, Draft GEF Policy, Institutional, and Governance Reforms.

¹⁰ http://www.thegef.org/gef/sites/thegef.org/files/documents/GEF_R5_32_CRP1.pdf

¹¹ <http://unfccc.int/resource/docs/2009/cop15/eng/11a01.pdf>

¹² Joint Summary of Chairs – GEF Council Meeting December 5-8, 2006. *Decision on Agenda Item 16: Roles and Comparative Advantages of the GEF Agencies*

the manner in which agencies planned their GEF portfolios. It created disincentives for the agencies to undertake projects that involved a relatively smaller GEF grant.¹³ At the same time, given the adoption of the resource allocation approach, for countries that had smaller allocations (or were part of group allocations) smaller projects were more feasible.¹⁴ It was expected that national and regional institutions might be more cost effective in addressing the service gap.

11. Overall, there was a general consensus within and among the replenishment participants, the GEF Council, and the Secretariat, to broaden the GEF partnership. Although the existing GEF Agencies also expressed their support, they advocated a more cautious approach. In the paper on “Issues for the Strategic Positioning of the GEF” (June 2009, GEF/R.5/16), which the agencies jointly prepared for the second meeting for the GEF-5 replenishment, they welcomed the broadening of the partnership that “could bring additional comparative advantage and expertise to the GEF portfolio and where such expansion is cost-effective for the network.”¹⁵ However, they also explained why materialization of these advantages may be difficult. They noted that, among other things, the new agencies will also need to bear additional fiduciary and legal responsibilities to be in compliance with the GEF requirements. Similar concerns were expressed again in the comments by several GEF Agencies on the documents prepared for the fourth meeting of the GEF-5 replenishment.¹⁶ OPS-3, and more recently OPS-5, had also reported the concern that the increase in number of GEF Partner Agencies has a bearing on the transaction costs as it makes the partnership more complex to manage. While the concerns raised by the agencies did not affect the GEF decision on whether or not to broaden the partnership, it does seem to have influenced the GEF into adopting a more cautious approach to broadening.

12. After the conclusion of the GEF-5 replenishment negotiations on 12th of May 2010, further deliberations on the GEF approach to broadening of the GEF partnership shifted to the GEF Council meetings. The GEF Council met on 24th of May 2010 and endorsed the policy recommendations of the replenishment participants.¹⁷

Development of the GEF Approach to Broadening

13. Even before conclusion of the GEF-5 replenishment agreement, it had become clear that broadening of the GEF partnership will be implemented during the GEF-5 period. The Secretariat started working on developing the proposals for the upcoming GEF Council meeting in June-July 2010. In early April 2010 it engaged Grant Thornton to analyze issues related to broadening of the partnership such as costs and benefits, accreditation process, and appraisal of applications, and to propose policy options. The paper ‘*Broadening the GEF Partnership by Operationalizing Paragraph 28 of the GEF Instrument*’ (GEF/C.38/8), which was prepared by the Secretariat, builds on the analysis presented in the Grant Thornton report. Taking into account the proposals in the paper and the ensuing Council discussion on the topic, the Council called for the establishment of a Sub-committee of the Council to be chaired by the CEO and with six other members that were split among the recipient and non-recipient countries for

¹³ APR 2009.

¹⁴ Mid-term Evaluation of the System for Transparent Allocation of Resources –pages 50 to 52.

¹⁵ <http://www.thegef.org/gef/sites/thegef.org/files/documents/GEF.R.5.16.pdf>

¹⁶ GEF/R.5/Comments/1,

http://www.thegef.org/gef/sites/thegef.org/files/documents/Comments.from_the_Executing.Agencies.pdf; and, GEF/R.5/Comments/2,

http://www.thegef.org/gef/sites/thegef.org/files/documents/Comments.from_the_Executing.Agencies.pdf

¹⁷ Joint Summary of Chairs. May 2010. *Decision on Agenda Item 4:Fifth Replenishment of the GEF Trust Fund.*

development of the eligibility criteria for the potential partners. The decision also requested the Secretariat to establish a task force, comprising of up to four independent experts, to develop the accreditation procedure.¹⁸ The decision to establish the Council Sub-committee was reflective of the Council's desire to be more involved in the designing process so that Council's priorities are also reflected in the details of the proposals, to ensure greater transparency of the process and greater buy-in from the Council.

14. After the 2010 June-July Council meeting, the Secretariat established a three member Task Force with expertise on social safeguards, internal audits, fraud investigations, evaluation, and risk management. The task force reviewed the proposals that were under development and offered several suggestions and recommendations that were incorporated in the eventual GEF approach.¹⁹

15. The Council-Sub-committee was established in the June/July 2010 Council meeting. The Sub-committee led the process of development of the eligibility criteria and procedures. During the September 2010 to April 2011 period, the Council Sub-committee met at least five times to discuss various options on eligibility criteria for the potential partners. The Secretariat continued to consult with the Council-Sub-committee members in periods between these meetings and the comments received from the Sub-committee through this process helped the Secretariat in refining the Council papers that were under preparation (see Annex 2 for details).

Council Approval for Key Measures

16. In November 2010, based on the recommendations presented in the '*Broadening of the GEF Partnership under Paragraph 28 of the GEF Instrument: Key Policy Issues*',²⁰ the Council decided that the broadening will be undertaken on a pilot basis; the new agencies accredited to the GEF will be called Project Agencies; and, the rules and criteria for accreditation of the new Project Agencies would also be applicable to the existing GEF Agencies to ensure a level playing field. In its May 2011 meeting, the GEF Council approved the policies, procedures, and criteria for accrediting new institutions.

17. Various policy documents approved by the Council provided a basis for the development of the accreditation criteria and procedures. The accreditation criteria drew heavily from the GEF Fiduciary Standards approved by the Council in 2007.²¹ The '*GEF Policies on Environmental and Social Safeguards and Gender Mainstreaming*'²² were reviewed by the Council in its May 2011 meeting. The Council approved the policy on gender mainstreaming, but approved the policy on Environmental and Social Safeguards (ESS) only on a provisional basis. In its next meeting in November 2011, the Council approved '*The GEF Policy on Agency Minimum Standards on Environmental and Social Safeguards*'²³. The Trustee's paper on '*Clarifying the*

¹⁸ Joint Summary of Chairs – GEF Council Meeting June-July 2010. Decision on Agenda Item 14: Broadening the GEF Partnership by Operationalizing Paragraph 28 of the GEF Instrument.

<http://www.thegef.org/gef/sites/thegef.org/files/documents/Joint%20Summary%20of%20the%20Chair.FINAL%20June%202010.pdf>

¹⁹ Based on the report prepared by the GEF Expert Task Force on its Aug 26th 2010 meeting.

²⁰ GEF/C.39/7/Rev.2

²¹ PR/IN/04, GEF/C.31/6

²² GEF/C.40/10/Rev.1

²³ The Council reviewed GEF/C.41/CRP.02 and GEF/C.41/CRP.05. The Council requested changes in the documents for finalization of the policy. The finalized policy is provided in the GEF.C.41.10.Rev.01 document.

*Responsibilities of the GEF's Key Actors with respect to the Use of GEF Resources'*²⁴, presented to the Council in its June 2012 meeting, explained the role of the new Project Agencies along with that of other actors within the GEF partnership. The Council approved the approach presented in the paper to strengthen the Financial Procedures Agreements (FPAs) with the GEF Partner Agencies.

The GEF Accreditation Process

18. The GEF Project Agency accreditation procedure has three distinct stages²⁵:

- (a) **Submission of Stage 1 Application, Value-added Review, and Council approval:** During this stage the applicants submit a completed application, along with the endorsement letter from a GEF Operational Focal Point and with identification of an initial project. The Secretariat surveys the application for completeness and, where required, follows up with the applicants to ensure that the gaps in the application responses and supporting documentation are addressed. The complete application is then reviewed by the Value-added Review Panel comprising of the Secretariat staff. Based on this review, the Secretariat recommends the selected applicants to the Council for approval for assessment for Stage 2.
- (b) **Submission of Stage 2 Application and Accreditation Panel Review:** The applicants that receive Council's approval, submit a completed application for review by the Accreditation Panel. The Secretariat surveys the application for completeness and, where required, follows up with the applicants to ensure that the gaps in the application responses and supporting documentation are addressed. The applicants pay an upfront fee of US \$ 25,000 for the first desk review. The Accreditation Panel then conducts the desk review. For the applicants for which an additional desk review and/or field verification is required, an additional fee is determined by the Secretariat on a case by case basis and paid by the applicants. Based on the Panel's collective assessment, the applications are grouped into four categories - "Approval", "Conditional Approval", "Requires Further Review" or "Rejection." Conditional approval is possible in the cases where the Panel is convinced that the applicant is compliant with GEF Fiduciary Standards and will complete the necessary steps to fully adhere to other requirements generally within 6 months, however applicants are not eligible to sign Financial Procedures Agreement (FPA) during this time. With a conditional approval, applicants are eligible to sign an interim Memorandum of Understanding (MoU) and submit project identification forms (PIFs) to the Secretariat for technical clearance, but they cannot receive any GEF funding during this time.²⁶ The document on 'Procedure: Accreditation of GEF Project Agencies' (PR/IN/04) stipulates that up to a one-year grace period can be granted, during which the agency will be expected to come into full compliance with all the GEF minimum standards. FPA, which enables the Trustee to commit and transfer funds, cannot be finalized until the Accreditation Panel has confirmed that all the necessary requirements have been complied with. If the standards have not been met, the entity may reapply for accreditation at a future date. The entities that receive the

²⁴ GEF/C.42/04

²⁵ PR/IN/04

²⁶ PR/IN/04

Accreditation Panel's approval then proceed to the Stage 3 of the accreditation process.

- (c) **Stage 3** involving conclusion of MoU and FPA: Applicants sign a MoU with the Secretariat in which they commit to follow all relevant GEF policies and procedures. The GEF Trustee then enters into a Financial Procedures Agreement (FPA) with the GEF Project Agency that enables the Trustee to commit and transfer funds. Upon conclusion of the FPA, the entity is included in the GEF partnership as a Project Agency and is eligible to receive resources for implementing approved GEF activities supported from the trust funds managed by the GEF: the GEF Trust Fund, the Least Developed Countries Fund (LDCF), and the Special Climate Change Fund (SCCF).

Progress Thus Far

19. On 3rd of November 2011, the Secretariat issued a call for applications. During the first round of submission, 16 applications were received by the 31st December 2011 deadline. Of these, six were from national agencies, four from regional organizations, four from civil society organizations, and two from UN organizations.²⁷ Because of the rule that “until at least five national agencies have been approved by the Council, the Secretariat may review applications from regional organizations and non-governmental organizations but will not review applications from other types of organizations” (GEF/C.40/09), the GEF Secretariat did not undertake reviews of Stage I applications received from UN-HABITAT and WPF. The Secretariat's Value-added Review Panel started reviewing the remaining 14 applications in January 2012 and completed the process in April 2012. Table 1 provides a list of the 14 applicants whose applications were reviewed during Stage 1 of the GEF accreditation process. After conducting the Value-added review, the Secretariat recommended 11 agencies for approval to the Council in June 2012 (GEF/C.42/09/Rev.01). The Council accepted the Secretariat's recommendation for approval of these agencies.²⁸ It also accepted the GEF Secretariat's suggestion to impose a moratorium on new applications so that the cap of 10 accredited agencies for the GEF-5 pilot is not exceeded.²⁹

20. The 11 applicants approved by the Council submitted their Stage 2 applications in May 2012 and subsequently made initial fee payments to the Secretariat. A three-member Accreditation Panel started reviewing the Stage 2 applications in June 2012. On June 14th 2013 WWF-US became the first agency to clear Stage 2 of the accreditation process. As of April 2015, five agencies have cleared Stage 2 of the accreditation process and four of these – WWF-US, Conservation International, IUCN and DBSA – have completed the Stage 3 as well. Although FUNBIO progressed from Stage 2 to Stage 3 in October 2014, the Stage 3 process for accreditation has not yet been completed.³⁰

²⁷ GEF/C.42/09/Rev.01

²⁸ Joint Summary of Chairs – GEF Council Meeting. June 2012. Decision on Agenda Item 16 Secretariat Recommendations of Project Agencies for Accreditation.

²⁹ GEF/C.42/09/Rev.01 and Joint Summary of Chairs.

³⁰ https://www.thegef.org/gef/agencies_accreditation

Table 1: List of Applicant Agencies-with accreditation status*

Entity Name	Entity Type	Geographical Coverage	Staff Strength	Agency Establishment	Present Status***
SPREP	Regional Agency	Pacific islands: 19 countries	103**	1991	Rejected at Stage I
OSS	Regional Agency	North Africa - 22 countries	20	1992	Rejected at Stage I
ANII	National Agency	Uruguay	52	2006	Rejected at Stage I
IFRC	Civil Society Organization	Global - 187 countries	415,000**	1919	Rejected at Stage II
FONAM	National Agency	Peru	-	1997	Rejected at Stage II
VTB	National Agency	Russia	54,606	1990	Withdrew in Stage II
WWF-US	Civil Society Organization	Global – 100 countries**	5,400	1961	GEF Project Agency
CI	Civil Society Organization	Global – 30+ countries**	900**	1987	GEF Project Agency
IUCN	Civil Society Organization	Global – 160 countries	1,000	1948	GEF Project Agency
DBSA	National Agency	South Africa	705	1983	GEF Project Agency
FUNBIO	National Agency	Brazil	60	1996	Stage III
FECO	National Agency	China	180	1989	Stage II
CAF	Regional Agency	Latin America and Caribbean	-	1970	Stage II
BOAD	Regional Agency	West Africa – 8 countries	291**	1973	Stage II

*Unless specified the data is based on the information provided by the applicants in the application forms. **Source website of the organization and data as on 2015. *** As on 15th of April 2015.

OBJECTIVES, KEY QUESTIONS AND METHODOLOGY

Objectives of the Broadening

21. The relevant GEF-5 Replenishment Negotiation documents and the Council Documents on broadening of the GEF partnership do not make an explicit statement on the objectives of this reform process. However, there are several statements spread across the GEF-5 replenishment documents and the relevant Council documents that are indicative of the intent. The document, “*Special Themes for the GEF-5 replenishment*” (GEF/R.5/6), notes that “there is the potential to acquire a broader range of expertise in GEF projects, generate more co-financing and be more cost-effective by broadening the range of agencies accredited to work as GEF Agencies.” The policy recommendations of the negotiations for GEF-5 replenishment (Annex 2, GEF/A.4/7) note that broadening of the GEF partnership “could provide countries with more choice, but also could reduce the overhead costs of resource delivery, if structured properly”.³¹

22. The Council Working Paper “*Broadening of the GEF Partnership under Paragraph 28 of the GEF Instrument: Key Policy Issues*” lists six benefits of broadening that are also indicative of the intended objectives (GEF/C.39/7/Rev.2). These benefits include: access to unique skills, capabilities, and other assets including co-financing; access to in country experience, local knowledge, and new networks; greater cost effectiveness; enhanced country ownership as per the Paris Declaration; promotion of the agreed measures of the Accra Agenda; and, direct engagement with regional entities.

23. Overall, the objectives for broadening of the GEF partnership appear to be to: provide countries with greater choice; harness new expertise, networks and knowledge; and, reduce cost of resource delivery. For this evaluation, these objectives have been taken into account for developing the evaluation questions.

Key Questions

24. The original objective for the evaluation was to provide evaluative evidence to the Council so that it may decide whether to continue accrediting GEF Project Agencies and whether and how the accreditation approach should be amended (GEF/C.40/09). However, the revised mandate given by the Council in October 2014 called for the evaluation to focus on the accreditation process.³²

To what extent is the accreditation process designed to achieve its intended purpose?

25. The evaluation determines the extent to which the criteria and procedures adopted for accreditation are likely to lead to the agencies that meet GEF’s ex-ante expectations from the new partners. The evaluation assesses the extent to which accreditation criteria are sound in assessing the suitability of institutions to be GEF Agencies. It also identifies the barriers to the potential Project Agencies applying for accreditation and/or attaining accreditation.

³¹ http://www.thegef.org/gef/sites/thegef.org/files/documents/GEF-A.4-7%20Summary%20of%20Negotiations%20of%20the%20Fifth%20Replenishment%20of%20the%20GEF_0.pdf

³² *Decision on Agenda Item 11: Progress Report on the Pilot Accreditation of GEF Project Agencies & Timeline for Further Discussion of Accreditation.* JOINT SUMMARY OF THE CHAIRS - 47TH GEF COUNCIL MEETING OCTOBER 28 – 30, 2014

To what extent is the accreditation process fair and transparent?

26. The evaluation assesses the extent to which the accreditation process, including the criteria and other rules and procedures, are perceived to be fair and transparent. It assesses the perceived fairness of the process by gauging the perspectives of different agencies. The evaluation takes stock of the accreditation related communications and decisions, and assesses the extent to which these were timely, consistent and clear.

To what extent has the accreditation process been efficient from the perspective of different stakeholders?

27. The evaluation takes stock of the financial costs, time, risks, and institutional resources deployed for accreditation. It assesses the extent to which actual costs borne by different actors are in line with the anticipated costs. It assesses whether there were some procedures that led to inefficiencies and the extent to which these could have been mitigated. It identifies the good practices and the missed opportunities in terms of measures that may reduce cost. It also assesses the extent to which time taken for accreditation was reasonable.

What are the early results the accreditation process?

28. It assesses the extent to which new Project Agencies are bringing in new networks and knowledge to the partnership, and the extent to which GEF portfolio is changing as a result of the new partners and whether the project proposals submitted so far by the GEF Project Agencies are any different from those submitted by the GEF Agencies. It determines whether the Project Agencies have increased the choices available to recipient countries. It also ascertains whether there is actually a level playing field in the manner in which the proposals by the Project Agencies are reviewed. The evaluation takes stock of the changes that have taken place within the applicant organizations in terms of their systems, procedures and the further changes that they anticipate in near future.

What are the emerging lessons from the accreditation process?

29. The accreditation process has been under implementation for the past three years. The evaluation identifies and describes the lessons that emerge from the experience thus far. The focus of the enquiry is on identifying areas that could be improved.

Evaluation Approach

30. The evaluation draws from interviews of key stakeholders and experts, review of the documents on procedures and rules for accreditation, and review of the correspondence between the Secretariat and the applicants. It also draws from the application materials submitted by the agencies and the assessments prepared by the Value-added Review Panel and the Accreditation Panel. Information gathered from different sources on the key questions of the evaluation was used for triangulation. For most questions information was available from several sources, which helped in identification of the points of agreements and points where perspectives differed based on the type of information source or individual experiences.

31. Perspectives of the key stakeholders were captured through interviews and in some instances through written responses (annex 3). The key stakeholders include the relevant staff of the

Secretariat, the applicants including the Project Agencies, the Trustee, Operational Focal Points (OFPs), Accreditation Panel members, and other funds that have used the accreditation approach. Table 2 provides information on coverage of key stakeholders through interview and written responses. The coverage of applicant agencies, GEF Secretariat and Independent Accreditation Panel, is fairly strong as all or almost all of the intended stakeholders were covered. However, coverage of other categories such as the task force experts, OFPs, and Council Sub-committee is weak due to poor response rates for these categories. The evaluation mitigated the lower coverage of these groups through greater reliance on information from minutes and email communications, and from the GEF Extended Constituency Workshops. Annex 1 presents the list of people interviewed for this evaluation.

Table 2: Interviews conducted including written responses

Category	Number of respondents
Applicant entities staff (applicant agencies covered 13/14)	20
GEF Trustee	2
GEF Secretariat	15
<i>Value-Added Panel</i>	<i>6</i>
<i>Project Proposal Reviewers</i>	<i>4</i>
<i>Staff that provided support for designing accreditation criteria and process and/or its implementation</i>	<i>5</i>
Accreditation Panel	3
Task Force Experts	1
Operational Focal Points	2
Adaptation Fund	1
Green Climate Fund	1
Others (Ex-GEF Secretariat Staff)	2
Total respondents	47

32. The evaluation team compared the GEF approach to accreditation with the approach adopted by the Adaptation Fund and the Green Climate Fund based on the publicly available documents supplemented with interviews with the key staff from these organizations. Although, the evaluation does not seek to evaluate the approaches adopted by the Adaptation Fund and the Green Climate Funds, on some topics it does compare their experience with that of the GEF.

33. The evaluation assessed the evolution of the rules and procedures for GEF accreditation process based on the interviews, the information provided in the relevant Council documents, minutes of the meetings for development of these rules and procedures, and notes shared by some of the participants in the meetings. The evaluation took stock of the guidance that was provided to the applicants at the start of submissions for Stage 1 and Stage 2 of the accreditation process.

34. The evaluation undertook a review of the correspondence between the Secretariat and the applicants, to understand the issues being discussed through these communications, responsiveness

of the Secretariat, and issues that were of concern to the applicants. To assess whether the progress so far has led to an increase in choices of the recipient countries, the evaluation also surveyed the emerging GEF portfolio of the Project Agencies, and also gathered information on project design exercises conducted by the GEF Secretariat during the five Extended Constituency Workshops in Namibia, Sri Lanka, Nicaragua, Paraguay, and Cape Verde, conducted between February and April 2015.

35. The terms and descriptions in this report are consistent with the definitions provided in “Accreditation Procedure for GEF Project Agencies” (Annex 1, GEF/C.39/8/Rev.2).

Limitations

36. The evaluation team had a short time frame to contact the key stakeholders and knowledgeable individuals, and to follow up with them to ensure higher response rates. Therefore, some tradeoffs were made –the evaluation team focused more on getting responses from some of the groups more than others. This also affected the extent to which consultations could be organized for developing the evaluation approach and also the extent to which the evaluation findings could be shared in a timely manner.

Evaluation Team and Duration

37. The evaluation is led by Neeraj Kumar Negi, Senior Evaluation Officer at the GEF IEO. Molly Watts and Aditi Poddar, consultants, were other members of the evaluation team. The Evaluation started in December 2014 with preliminary work for preparation of the approach paper. Its evaluative phase for data gathering was from January 2015 to April 2015.

Consultations with stakeholders

38. A draft approach paper of the evaluation was shared with the stakeholders that include the GEF Secretariat, Partner Agencies, the Trustee, and STAP. Feedback received from the stakeholders was addressed in revising the evaluation approach. The preliminary findings of the evaluation were presented in an interagency meeting organized in Washington DC on 16th of April 2015. The feedback provided during this meeting is reflected in this report. The draft report of the evaluation report was shared with the stakeholders to provide them an opportunity to provide feedback on the facts and analysis presented in the report. This report takes into account the feedback received through this process.

FINDINGS

Early Results

Conclusion 1: *Early results of broadening the GEF partnership indicate that expanding the choices of recipient countries has provided the GEF access to new expertise and networks. Project Agencies report having gained from the accreditation process through improvements in their systems and standards. While the new Project Agencies in the GEF partnership have put additional demands on the Secretariat, such demands are expected to decline once these agencies gain more experience.*

Expansion of Choices for Recipient Countries

39. The Project Agencies that have been included in the GEF partnership have led to expansion of the choices of the recipient countries. As more agencies are included the choices are bound to increase. The new Project Agencies also provide GEF access to new networks and have comparative advantages in addressing several of the GEF priorities. Given the steep learning curve, the project proposals submitted by Project Agencies require more upstream consultation and feedback from the Secretariat, however, this is improving as they gain more experience. The project reviewers at the GEF are appreciative of the flexibility and responsiveness demonstrated by the new Project Agencies in taking their feedback onboard.

40. As of April 30th, 2015 only four agencies have fully completed the GEF accreditation process and have become Project Agencies. Only one of these (DBSA) is a national Project Agency. The evaluation team reached out to all the countries that had an approved GEF project to be implemented by a Project Agency and/or where a national Project Agency had been accredited. However, of the six OFPs that the evaluation team reached out to, only two responses were received. Both the Operational Focal Points that responded felt that the choices had increased. The GEF OFP of South Africa stated that the country had encouraged DBSA to become a GEF agency with an aim to use the agency to undertake projects that address clean energy and energy efficiency. The OFP also expects that accreditation would eventually lead to capacity building across a wider set of national institutions by encouraging them to adhere to the global best practices.

41. To assess the extent to which the choices of countries have been expanded the Evaluation team, with support from other GEF IEO colleagues, tracked the Extended Constituency Workshops conducted by the Secretariat in different regions. During these workshops one of the practical exercises that the Secretariat conducts requires the participants to design a GEF project within the pre-specified parameters and identify appropriate GEF Partner Agencies for implementation. The aim of the exercise is to simulate real world situations – within the GEF programming context – for the recipient countries so that they have clarity on how the GEF project preparation process works and what parameters need to be taken into account. Usually the participants are arranged in groups of 5 to 10 participants – generally by country. In each of the ECWs 8-12 of such groups participate. The Office has tracked the results of the five recent ECWs in: Namibia, Nicaragua, Paraguay, Sri Lanka, and Cape Verde. The results showed that in all of these project design exercises, at least one or more of the groups identified a GEF Project Agency as the preferred partner for implementation of the project that they had designed during the exercise. All three international NGOs – WWF, IUCN and Conservation International – have been specified as the preferred partner in two or more instances. While the projects designed as part of the exercise are based on realistic premises, these are not real proposals. Nonetheless, the experience thus far indicates that the mental scape of the recipient countries includes Project Agencies as a viable implementing agency option.

42. The best evidence on this front, however, comes from the list of approved projects to be implemented by the Project Agencies. Of the 10 GEF Project Agency projects approved so far, five are national projects. These five projects are in five different countries covering all four GEF regions.

Expansion of Knowledge and Networks

43. Based on self-reporting, the Project Agencies believe that they are providing the GEF access to new networks of executing partners, field presence in new areas, and agility in developing and starting projects on the ground compared to the GEF Agencies. WWF, IUCN, and Conservation International report that their network of partners expands the reach of the GEF partnership. For example, WWF reports that it brings a global network of executing partners in 100 countries around the world, as well as offering new and innovative partnerships. Conservation International notes its field presence in 30 countries and more than 1000 partner organizations. IUCN points to its membership that includes more than 1000 state, government agency and NGO members, its field presence in more in 45 countries, and its experience of working in SIDS. DBSA, the only national agency to have fully completed the accreditation process so far, notes that they work intimately with municipalities, and this will expand the reach of the GEF partnership.

44. The Project Agencies that have been accredited so far address concerns related to biodiversity conservation, sustainable forest management, land degradation, climate change adaptation, Large Marine Ecosystems (LME); and, to some extent on climate change mitigation, chemicals and waste. FUNBIO reports its comparative advantage in biodiversity conservation and sustainable forest management. Conservation International brings expertise in addressing concerns related to biodiversity conservation, sustainable forest management, climate change adaptation, large marine ecosystems (LMEs), and land degradation. They are also interested in greater involvement in addressing concerns related to persistent organic pollutants (POPs) and the Minamata Convention on mercury. WWF assesses its main contributions coming in the areas of biodiversity, land degradation, and sustainable forest management. DBSA reports that in their role as a regional development bank they would be able to address concerns related to climate change mitigation, chemicals and waste. While the evaluation did not independently verify the claims of the agencies, it did cross check with the GEF Secretariat staff that have reviewed project proposals submitted by the new Project Agencies. The GEF Secretariat staff noted that the proposals submitted so far indicate sufficient technical expertise.

45. Project proposal reviewers noted several strengths of the project proposals submitted, and project ideas shared during upstream consultations, by Project Agencies. The proposals from international NGOs such as WWF-US, Conservation International and IUCN, given that addressing environmental concerns is central to their core mandate, tend to be well aligned with the GEF priorities. Thus, they bring a stronger environmental perspective than agencies whose primary focus is on addressing the wider development and poverty related concerns. In general, when a Project Agency proposes a project for a specific geographical area, they tend to have worked in that area for a relatively long period and are likely to continue working in that area. As a result the proposals submitted by the Project Agencies are often strong in terms of sustainability, as follow up activities are likely to continue after GEF support ends.

46. The Project Agencies, compared to GEF Agencies such as the World Bank and UNDP, are smaller organizations. While small size may constrain the Project Agencies in some ways it allows them to be more flexible. The reviewers in general felt that the new Project Agencies are eager to learn and are very receptive to the suggestions given by them during upstream consultations and PIF reviews. While some of this openness is also natural to expect, given that the Project Agencies are still in the early stages of their participation in a partnership that has been there for more than two decades, a part of this is also because they tend to be more flexible in their approach and are able to accommodate GEF business process related concerns better.

Project Agency experience compared to their expectations

47. The applicants had varying motivations for applying for GEF accreditation. Some of the applicants such as IUCN, SPREP and CAF were keen to be accredited because of the interest of their governing boards in becoming part of the GEF partnership and emerging as a reliable partner for area of their expertise. For national entities such as DBSA and FUNBIO encouragement from their national government and the GEF Operational Focal Point was an important motivation for application. Several organizations such as FUNBIO, VTB, DBSA, IUCN, WWF-US, and Conservation International, were interested in applying for GEF accreditation believed that this would be relevant to their goals and strategies and/or may provide them an impetus to shape their internal policies. In general applicants also saw GEF as an additional source of funding. Some applicants such as Conservation International and WWF-US felt that as GEF Project Agencies they will have greater access to recipient governments and would be able to identify greater opportunities for collaboration.

48. Project Agencies report that during the accreditation process they had to upgrade their system and standards, and had to reform their ESS policies to be in compliance with the GEF requirements. For example, Conservation International reports that prior to accreditation it had worked with different standards across the organization. Because of the accreditation process it was able to come up with a uniform approach by adapting the best practices from different units, and is now working to apply these standards across the agency. IUCN reports having made changes to its internal management practices as a result of the GEF accreditation process. These changes have been welcomed by the IUCN donors, who are also keen to see the changes applied to the entire IUCN portfolio. FUNBIO reports that accreditation process led their Board to agree to establish a system for internal audit – something that their top management had wanted to do for long but had not gotten around to doing it. Additionally, FUNBIO notes that accreditation has added to their reputation, as accreditation has given them more international visibility. WWF-US reports improvements in its approach to safeguards.

49. Of the Project Agencies, two Project Agencies – WWF-US and Conservation International – have an emerging portfolio of approved GEF projects. Altogether the 10 approved projects for these Project Agencies account for US \$ 47.2 million in GEF grants. Some of the Project Agencies expect that, in addition to GEF funding, accreditation would also lead to improved access to finance from other sources. For example DBSA and IUCN report that they have been fast tracked for accreditation at the Green Climate Fund. WWF-US and Conservation International report that being a GEF Project agency has improved their access to country governments, and has provided them with greater opportunities to identify areas for future collaborative work with other national players.

50. Onboarding of Project agencies have put additional demands on the Secretariat. The Secretariat reviewers expect these demands to decline as agencies gain more experience with GEF requirements. The section of Onboarding of new Agencies starting on paragraph 118 provides more information on this topic.

Design of the Accreditation Process

Conclusion 2: *The accreditation process is designed to identify agencies that are in compliance with the GEF fiduciary standards, environmental and social safeguards, and gender mainstreaming policy, and that add value to the GEF partnership. However, some aspects of the original policy design slowed the accreditation process.*

51. The purpose of the accreditation process was to help GEF identify Project Agencies that were strategically aligned with GEF priorities and would add value to the partnership; were in compliance with GEF Fiduciary Standards, GEF Environmental and Social Safeguards (ESS) and Gender Mainstreaming Policy; would provide greater choice to the recipient countries and foster country ownership. The accreditation process was expected to be efficient so that suitable Project Agencies are identified and 10 Project Agencies, including at least five national institutions, are brought onboard within GEF-5.

52. The eligibility norms of the accreditation pilot prioritized the national agencies. Of the 10 agencies which could have been accredited as part of the Pilot, at least five were supposed to be national agencies representing at least three different regions. Given that this was a Pilot, representation to different regions was an appropriate measure as it allows more geographical diversity in experiences for further development of the approach. Similarly, eligibility of the international NGOs and regional organizations was also appropriate as these organizations are expected to expand the choices available to the recipient countries and would lead to greater diversity in terms of the profile of the GEF Partner Agencies. The constraint that the UN organizations may participate in the Pilot only after five national organizations have been accredited was also appropriate. Several UN organizations are already part of the GEF partnership. Opening the process to UN agencies during the first round of the Pilot posed the risk that it would crowd out the national agencies.

53. The Sub-committee did not explore the possibility whether a ‘fit-for-purpose’³³ approach would be appropriate for GEF – none of the proposals for GEF accreditation process presented to the Council included this as an option. The approach around which the consensus developed was that all new Project Agencies should be in full compliance with the relevant GEF policies and standards before their inclusion in the GEF partnership. Approved GEF accreditation approach aimed to assess the suitability of all the applicants using uniform criteria consistent with the relevant GEF policies and standards (GEF/C.39/7/Rev.2). This was also important from the perspective of creating a level playing field with the existing GEF Agencies. An implicit assumption also was that several of the targeted organizations, have capacities to meet the relevant GEF policies and standards or would be able to meet it with little effort. This, as it later turned out, was unrealistic.

54. The advantage of inclusion of Value-added review in the accreditation process is that it helps GEF ensure that a given applicant is strategically aligned with GEF priorities and adds value to GEF partnership. However, it also adds six months to the accreditation process. This said the actual time added to the accreditation Pilot process due to this stage may be lower as development of the template for Stage 2 Accreditation Review was undertaken parallel to the Stage 1 reviews.³⁴

55. Cost neutrality is a central feature of to the accreditation design; however, certain trade-offs exist. First, cost neutrality would not have been achieved, because costs related to value-added assessment and GEF staff dedicated to accreditation were not covered. While the initial application fee was necessary to increase the likelihood that only qualified applicants responded, the case-by-

³³ The ‘fit-for-purpose’ accreditation approach as defined by the Green Climate Fund, “recognizes the role of a wide range of entities, which differ in the scope and nature of their activities, as well as their capacities, in advancing the objectives of the Fund” (GCF/B.08/02). The term “Fund” in the definition refers to the Green Climate Fund. The ‘fit-for-purpose’ approach is distinguished from a uniform approach, which does not take these differences into account.

³⁴ The criteria for Environmental and Social Safeguards was approved in November. It would have taken some time before the approved criteria were converted in to questions and application template. However, for future rounds of the accreditation process, this is bound to add 4 to 6 months to the process.

case determination of additional fees for further review and field verification increased the potential for delay.

Stage 1: Value-added Review

56. The first stage of the accreditation process included a screening of the applications to ensure their completeness and conducting a value-added review to assess suitability of the agencies based on the six core criteria. The criteria included: relevance to the GEF, demonstration of environmental or climate change adaptation results, scale of engagement, capacity to leverage co-financing, institutional efficiency, and, networks and contacts. The Secretariat prepared a review approach and guidelines for implementation of the approach for assessment of the applications. In all there were 29 questions or standards that corresponded to these six core criteria. An applicant, depending on whether it was a national institution, a regional organization, an international organization, or a civil society organization, had to respond to 24 to 25 of these questions. The responses on the first 26 questions were to be assessed using a four point scale where “4” indicated strong performance and “1” indicated poor performance. Reviewers had to give an overall score for each of the core criteria. The guidelines provided an explanation for each of the ratings. The last three questions/standards were assessed on a binary scale (pass/fail). A panel constituted of the Secretariat staff was to assess the value-added by the applicant based on the specified criteria. The ratings given by the Value-added Review Panel members was to be used to arrive at a mean rating. This mean rating was the basis of determining whether an agency met the minimum expectations on a given criterion and a standard within the criteria. The Secretariat was to provide its recommendations to the Council for approval based on its overall assessment of the value-added by the applicants – taking into account the criteria scores but with flexibility to consider other factors not fully covered by the criteria – in making recommendations.

57. The criteria addressed the major issues essential to determine the strategic fit and value-added by the applicants. However, some of the specified standards were not precise and for 14 of the 26 questions, where responses were rated on a four point scale, expected thresholds for ratings were not specified. For example, question 9 of the form asked the applicants to provide clear, quantifiable, GEF relevant results that a given applicant has helped achieve through at least five of its projects, along with quantified descriptions of the result. However, the guidance provided for the ratings does not provide any indication for how the quantified results will be converted to a rating. In other instances, although the question asked was fairly broad in scope the rating approach was fairly narrow. For example, question 5 of the form asks the applicants to “describe its experience in implementing or executing environmental and/or climate change adaptation projects financed by funders other than the GEF.” However, the description provided in the rating scale seems to suggest that the term “funders other than the GEF” refers only to bilateral and multilateral agencies as other funding sources are not addressed. There is a lot of scope for improving the value-added assessment through a more precise specification of standards and performance thresholds for rating.

58. The Value-added review was to be conducted by an in-house panel in the GEF Secretariat. This provides strong expertise for assessment of the strategic-fit and value-added by the applicants. Although the process is likely to be influenced by management priorities, the design of the Value-added review ensures that the GEF management would have more detailed information at hand before making its recommendation to the GEF Council.

Stage 2: Accreditation Panel Review

59. The GEF policy on Environmental and Social Safeguards (ESS) requires that all GEF Partner Agencies, including the Project Agencies, would need to demonstrate that they have systems in place to meet GEF Safeguard requirements. Similarly, compliance with the GEF Policy on Fiduciary Standards approved in 2007 and the GEF Gender Mainstreaming Policy (2011) are also essential for accreditation.

60. Among the minimum standards on ESS, Environmental and Social Impact Assessment, Protection of Natural Habitats, and, Accountability and Grievance Systems were compulsory for all the applicants. Whereas the remaining five ESS standards were applicable on a case by case basis. The standards were translated into questions that the applicants may respond to by the Accreditation Panel that had been brought on board in December 2011. Although there were 140 questions in the application form, the total actual number of questions were considerably higher as some of the questions had several embedded sub-questions. For example a question on external auditor (question A.1.5) had four separate embedded questions.

61. For assessment of the responses to the questions, the Panel developed a six-point scale where the scores of 5 and 6 denoted an acceptable level of performance. The desk review based assessment used the written response and supporting documentation provided by an applicant. The field verification visits were aimed at ensuring that the level of performance or compliance indicated in the written response and through documentation exists.

62. Overall, the standards specified in the Stage 2 application are in line with the relevant GEF policy requirements. While the Fiduciary Standards, including standards on auditing, financial management and control, project appraisal and oversight, investigations, and gender mainstreaming were relatively straightforward and the applicants were familiar with these, the minimum standards on ESS were more challenging. The adoption of the ESS approach is fairly recent even for the leading multi-lateral organizations. Even the World Bank approach on ESS – on which the GEF approach was modeled – is still evolving.³⁵ Further, the working assumption that several applicants were in compliance or close to full compliance was too optimistic.

63. Translating the standards to questions and making these questions understandable to the applicants was a challenge, especially for ESS. In addition to lesser familiarity, absence of an opportunity for the applicants to clarify the questions of the application form with the Accreditation Panel through an up-front face-to-face interaction led to gap in understanding. Although there was no repetition in the ESS questions, some of the applicants found several of them repetitive. This perception was primarily because of lack of familiarity with the topic – for some applicants it was difficult to distinguish the nuances among questions.

64. A major concern that the applicants had was that the ESS standards were too prescriptive. The original World Bank approach from which the GEF developed its own approach, had specific policies on Equivalence & Acceptability, and Addressing Gaps.³⁶ These policy measures, aimed at making the ESS approach more generic, were absent in the GEF approach and this is believed to have reduced the level of flexibility the Panel had in applying the ESS related criteria.

³⁵ http://consultations.worldbank.org/Data/hub/files/consultation-template/review-and-update-world-bank-safeguard-policies/en/materials/first_draft_framework_july_30_2014.pdf

³⁶ OP 4.00 - Piloting the Use of Borrower Systems to Address Environmental and Social Safeguard Issues in Bank-Supported Projects

65. As noted earlier, among the ESS standards three were compulsory whereas the remaining five were applicable on a case by case basis. This provided some flexibility to applicants, as they could choose among the non-essential standards. However, this choice has a bearing on the types of GEF supported activities that they may undertake as Project Agencies.

66. Another potential challenge is the enforcement of ESS given the legal status of the newly accredited agencies. The 10 original GEF Agencies, which were the World Bank and UN organizations, could enforce ESS in the countries that they were implementing projects in because they had legal agreements with governments – as international organizations they could enter into treaties with the national governments. Given that the multilateral institutions were not included in the first round, the new set of Project Agencies do not have a similar legal standing.

Independence of the Accreditation Process

Conclusion 3: *Sufficient arrangements are in place to ensure that the Accreditation Panel is functionally and behaviorally independent, adding to the credibility of the process. There is room for further strengthening of the checks and balances in the accreditation process.*

67. A major challenge for the Council Sub-committee in designing the accreditation process was to ensure that the process is not susceptible to political pulls and pressures, and that the process would not pose a reputational risk for the GEF. Therefore, discussions during the Council Sub-committee meetings and the proposals for accreditation procedures made it clear that to the extent possible the accreditation process would be designed to make the accreditation reviews independent.

68. The Stage 1 of the accreditation process, which entailed Value-added assessment, was designed as a criteria based in-house assessment to be conducted by the Secretariat. An eight member panel comprising of GEF staff conducted these reviews. Elaborate criteria and procedures were used for value-added assessment to provide the exercise some legitimacy; else, the exercise could have been deemed to be arbitrary. Nonetheless, given that the exercise was conducted in-house, and the panel members were supervisees of the GEF management, the process – by design – was not structurally independent. Despite this structural lack of independence, the actual design of the Stage 1 process does increase the ability of the GEF management to base its recommendation to the Council – for approval of suitable applicants for the Stage 2 of accreditation – on the rich information on suitability of the applicants on the Value-added criteria gathered through the process.

69. The Stage 2 of the accreditation process, which entailed accreditation reviews and field verification, was to be conducted independently by the Accreditation Panel. The Panel was constituted by three subject area experts that were recruited as consultants by the Secretariat. Although the Secretariat was responsible for overall supervision of the consultancies, the Panel exercised considerable functional and behavioral independence. The three experts were authorities in their respective fields. Their stature added to the level of independence that they could exercise in their work. A key procedural measure approved by the Council that accorded greater legitimacy to the Accreditation Panel was that the Panel's decision on accreditation was final. During the process of development of the accreditation criteria and procedures, the Task Force had recommended this course because it believed that if any other entity could supersede the decision of the Accreditation Panel, it would compromise the Panel's authority and independence. Given the reputational risks involved, in practice the Panel received minimal interference from the Secretariat on substantive

issues related to accreditation. According to the Panel, while there were instances where the Secretariat did ask them to process the applications in a speedy manner, they were allowed to function independently on matters that pertained to their expertise.

70. The Accreditation Panel has the ability to accredit, reject, or ask for further reviews and/or field verification for making a decision on an application. The Panel's remuneration is based on the time spent on reviews. There is a risk of conflict of interest because of the Panel's ability to request additional reviews and create its own work – the Panel is expected to exercise self-regulation to ensure that this is not the case. The evaluation did not come across evidence to suggest that the Panel requested unnecessary reviews or created its own work but the risk still remains. Similarly, the Secretariat may extend the tenure of a Panel member based on performance review, which might also be perceived as influencing the Panel's independence. These arrangements need to be assessed alongside the approach to recovering the costs of reviews conducted by the Accreditation Panel.

Implementation of the Accreditation Process

Conclusion 4: *Implementation of the accreditation process has been slower than expected, primarily because of the high level of accreditation standards and design issues that became apparent during implementation. Overall the implementation of process was satisfactory, although there were some inefficiencies in implementation.*

Outreach

71. At the start of the accreditation process it was expected that 10 Project Agencies will be included in the GEF partnership during GEF-5. In the June 2012 Council meeting, the Secretariat, when presenting its recommendations for approval of applicants for Stage 2 reviews requested the Council to provide guidance on whether or not it should undertake any Stage I value-added reviews from additional applicants for Council consideration at its meeting in November 2012 meeting (GEF/C.42/09/Rev.01). The reason being that if all the 11 applicants recommended for the Stage 2 reviews were accredited then the GEF-5 cap of 10 Project Agencies would be exceeded. The Council decided to postpone the consideration of a next round of accreditation until its November 2012 meeting.³⁷

72. Given that the broadening of the GEF partnership had been discussed in the GEF-5 replenishment negotiations and in several Council meetings, the Operational Focal Points (OFPs) were well aware of the accreditation pilot. After the finalization of the Stage 1 application form and relevant procedures, the Secretariat made a call for applications on 3rd of November 2011. It informed the GEF member countries and other interested parties that the process had started, and when and how they may begin submitting applications. The GEF Secretariat established a dedicated page on accreditation at its website³⁸ to provide the potential applicants access to the key documents including application forms and guidelines, the template for the letter of support from a GEF Operational Focal Point, background documents relevant for accreditation, a brochure on accreditation³⁹, and other relevant information. The applicants, in general, felt that the documents

³⁷ The next round did not take place as the Council postponed the decision again in November 2012 meeting for the June 2013 meeting. In June 2013 it postponed it again till the first round was fully completed.

³⁸ http://www.thegef.org/gef/agencies_accreditation

³⁹ <http://www.thegef.org/gef/sites/thegef.org/files/documents/document/Accreditation.pdf>

such as templates, guidance and background documents, accessible through the GEF website were very useful.

73. Before the Secretariat issued a call for applications, several OFPs and their respective ministry officials, e.g. South Africa and Brazil, were already in touch with agencies that they thought were suitable and regularly updated the prospective applicants on the new developments. In Russia, the national government organized a competition to identify the agency that it would endorse for accreditation. This competition led to the selection of VTB. For the International NGOs, multiple sources of information were effective. For WWF-US the CSO network meetings and for IUCN the GEF Council meetings and related briefings were an important source of preliminary information. Conservation International's Director for Multi-lateral Funding kept track of the developments on broadening of the GEF partnership. Given that 16 agencies submitted their Stage 1 application by the 31st of December 2011 deadline, it may be inferred that the GEF Secretariat's outreach to potential Project Agencies was effective in making them aware of the opening and facilitating them in applying for the first stage.

74. Most applicants noted that the Stage 1 application was relatively straightforward (compared to the Stage 2 application). Some of them, however, felt that it would have been useful if there was an upfront opportunity to discuss the Stage 1 form with the Secretariat, the likely implications of their becoming GEF Project Agencies, and the costs that could be anticipated. The information gap was sufficiently mitigated by Secretariat on some of the aspects as it provided the required support to the applicants through telephone calls and, where possible, meeting them to provide clarifications. Given that the accreditation process was being piloted – it is unlikely that at this stage the Secretariat would have been able to provide a realistic estimate of likely costs to the applicants.

Pre-Application Submission Processes at Applicant Entities

75. In general, the governing boards of the applicants gave their nod to their organization's participation in the accreditation process. However, before the decision was made in most organizations there were wider discussions and consultations on this topic. Within Conservation International, the Director for Multi-lateral Funding prepared a memo for the senior management explaining what it would mean for them to become a GEF Project Agency. This started a discussion within the organization on this topic. IUCN conducted a scoping study to assess the opportunities, risks and challenges of becoming a GEF Agency. The study concluded that benefits outweighed risks, paving the way for IUCN's application.

76. Since most of the applicants had experience working as GEF executing agencies, the implications of becoming a Project Agency on the applicant's ability to execute projects was one of the key topics for discussion. The applicants such as Conservation International and IUCN did not want to lose their ability to be a GEF executing agency, regardless of the result of the accreditation process. For other organizations such as DBSA, which were not as involved in the execution of GEF projects, this issue was not a major consideration.

77. The costs of accreditation were also a point of discussion among organizations, although these were difficult to estimate accurately as only the initial accreditation fee of US \$25,000 for first round of desk review was known. Discussions on costs within WWF-US, Conservation International, FUNBIO, and IUCN, took note of the resources they might need to spend on capacity building and on making structural changes within the organization to meet the accreditation requirements. The scoping study which IUCN undertook also considered the transaction costs

involved in policy formulation, and the fact that cost recovery would not come until several projects had been approved. WWF felt that managing expectations of a large network of partners in their new role as implementing agency might pose some difficulties.

Stage-1: Value-added Panel Review

78. The Value-added reviews were conducted in March and April 2012 by an eight-member panel constituted of GEF Secretariat staff. Each completed application was reviewed by the panel members individually. For each question within the core criteria, an applicant's response was rated by each panel member separately. After the application had been rated, the ratings provided by different panel members for a given question were discussed. During this discussion the panel members also had an opportunity to share any relevant information that they had and – in case the rating they provided was an outlier – provide their rationale for the rating. This facilitated harmonization of the ratings. The panel members' recollection of these meetings indicates that on several instances there were disagreements among the panel members on the ratings. Panel members were of the opinion that more precise wording of some of the questions and clearer performance thresholds for the questions would have streamlined the discussion. The panel meeting did provide the members access to opinions of the peers and in several instances this allowed the panel members to adjust their ratings.

79. Through a survey of the assessment sheets, the evaluation team was able to identify about 2,300 instances where a rating on a value-added assessment question was given. Of these, in 70 (3 percent) instances a panel member's rating showed a change after the panel meeting. The incidence of change in ratings is statistically significant although it is not substantial. In 53 (76 percent) of these instances, the rating change involved an increase in the rating. There were five questions that involved rating changes in five percent or more instances. These questions pertained to the core criteria of 'institutional efficiency' and 'capacity to leverage co-financing' and covered issues such as: administrative costs and total project funding; actual co-financing raised and sources; time taken from conceptualization of a project to start of its implementation; and total number of projects implemented within a given period. The ratings on the questions on core criteria 'relevance to the GEF' and 'network and contacts' recorded the least instances of change.

80. There was unanimity among the panel members on all, but one, of the applicants that were recommended to the Council. Similarly, while all of the panel members agreed on two of the rejections, there was disagreement on one of the rejections. Given the number of panel members it is unrealistic to expect unanimity in all assessments.

81. During Stage 1, the Secretariat also asked the applicants to complete a pre-screening form for fiduciary standards. The aim of this exercise, which was not included in the original design of the accreditation process, was to alert the applicants of the key requirements on fiduciary standards for Stage 2 of the review. The pre-screening process did help some of the applicants in identifying gaps in their fiduciary systems. FUNBIO, for example, did not have an internal audit system and once this gap was identified in the screening process it was able to take steps to address this gap without having to wait for this feedback during the reviews for Stage 2. However, several applicants found the process to be redundant. In any case, as the actual experience during Stage 2 showed, applicants had relatively more gaps in their ESS policies and practices than in their fiduciary policies and practices. A simpler approach would have been to inform the applicants of what needs to be in place and what are the gaps for which they should be alert, instead of asking them to fill up a pre-screening form.

Stage 2: Accreditation Panel Review

82. The preparations for Stage 2 of the accreditation process began as early as August 2011. The Secretariat prepared the TORs for the members of the Panel and posted these openings for recruitment. The consultants for the Accreditation Panel were selected through a competitive recruitment process. The three consultants that were eventually selected had at least 20 years of relevant experience. In January 2012, the Secretariat organized a kick-off meeting for onboarding of the Panel members. The purpose of the meeting was to provide the Panel members: background information on the GEF accreditation process and procedures; information on the applicants for the Stage 1; guidance on the roles, responsibilities, functioning of the panel, and next steps; and, an opportunity to help them plan the internal functioning of the Panel.

83. The first major substantive task that the Panel undertook was to convert Stage 2 into questions to which the applicants for Stage 2 could respond. The Secretariat provided its feedback on the draft questions prepared by the Panel. The suggested changes were minor and were incorporated. The finalized questions were included in the Stage 2 application form.

84. After the Council approved 11 applicants to apply for Stage 2 of the process, the templates were sent to applicants. After the GEF Panel received the completed applications, each of the three Panel members conducted her or his own assessment of the given agency. After completion of a review, the Panel would interact through Skype to discuss their assessments. If gaps were identified, the applicants were asked to address these gaps. Field visits were undertaken by the Panel, accompanied by the Secretariat staff that coordinated the process, to interact with an applicant's staff to ensure that there are capacities to implement the standards and policies indicated in the application form. If gaps were identified the applicants were given some time for remedial measures. After being completely satisfied with the application, the applicants were approved. If an applicant was assessed to be in compliance with the GEF Fiduciary Standards, but still had some other areas where minor improvements were needed, the Panel gave a conditional approval so that remedial measures are undertaken before the FPA could be signed. After the Panel prepared its review report, it was sent to the GEF Secretariat. If need be, the GEF CEO sought clarifications on the critiques presented in the review report, and once satisfied the report was sent by the CEO to the respective applicant.

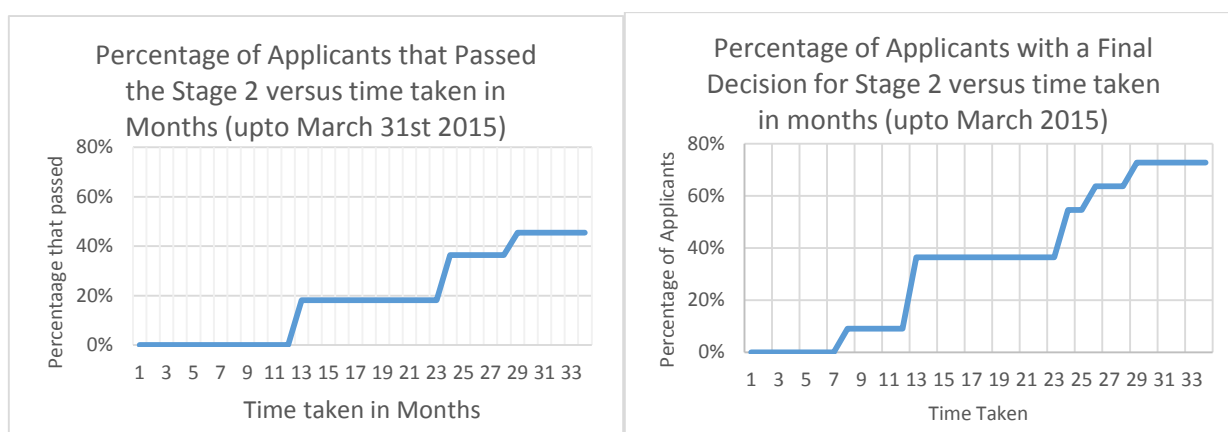
85. According to Panel members, each member showed utmost respect for the professional opinion of the other members. The assessment by a member on a response related to his/her area of responsibility was not questioned by other members of the Panel. On the flip side, this also has the effect of giving each Panel member a veto in the review process.

86. At the applicants' end, once the agencies received the application form for Stage 2, they started preparing their applications. As noted earlier, the assumption at the start of the accreditation process was that several applicants would already be in compliance with the GEF fiduciary standards and ESS. In practice this assumption was not found to be true. As a result, there was considerable back and forth during Stage 2 to ensure that applications were complete. Although some of the back and forth was also due to difficulties that the applicants faced in filling up the application forms, much of the time required in filling up the application forms was because of the time taken by the applicants in accomplishing the required ground work to fill the gaps in their systems, to develop the relevant policies, and to acquire new capacities. In terms of gaps, among the GEF Fiduciary Standards the applicants generally lacked whistle blower protection and public

disclosure policies. In comparison, most applicants were not in compliance with most of the ESS standards.

87. Several other factors also added time to the accreditation process. For example, the applicants from non-English speaking countries had to spend considerable time in translating key documents in English. For some organizations internal factors added to the time required for preparing the application. For example, DBSA had undergone major restructuring, between the period when the final application for Stage 1 had been submitted and the approval for preparing the Stage 2 application was received, and as a result most of the people that had been involved in initiating the accreditation process were not around when the work on accreditation resumed. This gap in institutional memory added to difficulties faced by DBSA in preparing the application for Stage 2.

Figure 1: Time taken during Stage 2 of Accreditation Process



88. At the time this evaluation was conducted, Stage 2 of the accreditation process had been under implementation for almost three years. Figure 1 shows the cumulative progress in Stage 2 accreditation, including final decisions (including rejections and withdrawal). Of the 11 applicants, 5 have been approved by the Panel, and a final decision on eight – including two rejections and one withdrawal – had been taken.

89. Average time per review including back and forth for incomplete submissions and time taken for applicants to respond to the Accreditation Panel's feedback was seven months. Much of this time – as also discussed earlier – was spent by the applicants in adopting measures that would help them in complying with the GEF requirements. When the back and forth on ensuring completion of the applications is excluded, the time taken by the Panel to prepare its review report on an otherwise complete application was about two months.

90. Soft copies of several documents submitted by the agencies were not compatible with the computer software used by the Accreditation Panel – as a result they were not able to quickly open these documents. However, the net effect of this on the total time taken during the review process is likely to be small.

91. Some applicants felt that feedback from the Panel could have been more detailed and helpful. Some applicants reported that they received scores on their responses, without sufficient explanation on the problems with the response and how it may be improved. A few national entities also felt that the lack of local knowledge with the Panel was a barrier to them being able to fully

understand the entities' policies with respect to national policies. In situations where the given country's constitution, national law or policy already required that the applicant needs to be compliant with a safeguard covered in the GEF accreditation criteria, and the applicants did not have an explicit policy re-stating it, the Panel asked the applicants for documentary evidence to support their claim. This was considered to be burdensome and led to some frustration among the national agencies.

92. Of the eight applicants that have either been accredited or are still in Stage 2, field verification visits have been conducted for seven. The field visits allowed the Panel an opportunity to verify whether the applicants are in a position to implement what the documents they had submitted indicated that they already are implementing or have capacities to implement. The gap between the Panel's assessment of the documentary evidence and their assessment based on field verification created its own challenges. In several situations where expertise-related gaps were identified – the applicants indicated their willingness to recruit the relevant expertise but felt that this should not be a precondition but something that they could be allowed to do after accreditation. From the applicant perspective it is easier for them to make these changes after their Agency has been accredited. Without a surety of accreditation, it is difficult for them to make a long term commitment to recruiting additional staff. The Panel's counter point to this is that one accredits based on actual capacities and not based on something that applicants may or may not do.

93. Applicants in general felt that the Panel was meticulous and detail oriented, but not as flexible as they would have wished. The Panel members, on the other hand, felt that although they were as flexible as possible the accreditation criteria also needed to be adequately addressed.

94. Applications of two agencies, FONAM and IFRC, were rejected. Another Agency, VTB, withdrew its application. The reasons for rejection of the applications from FONAM and IFRC were communicated to the applicants. Responses from IFRC and FONAM indicate that they felt that their applications should not have been rejected. One of the applicants felt that the application fee that they paid should be returned. VTB withdrew from the process out of its own volition because of the imposition of restrictions on VTB to operate in US and European markets. In the changed context it was difficult for VTB to aspire to be a viable GEF Project Agency.

95. In Summary, the actual accreditation process has been slower than expectations. Several weaknesses in the policy design of the process manifested during implementation. High standards set for applicants and some design issues that manifested in the form of inefficiencies during implementation led to delays. While the working assumption at the start of the accreditation process was that several agencies that would apply for accreditation would already be in compliance with the relevant GEF policies, in practice this assumption was not found to be true. As a result there was considerable back and forth during Stage 2 to ensure that applications were complete. However some of the inefficiencies had more to do with how the process was implemented than design weaknesses. As indicated in the section on communication below, the outreach effort of GEF had strengths but left out activities that would have helped the applicants in understanding the application criteria better.

Stage 3: FPA and MoU

96. Compared to the experience during Stage 2, the applicants that made it to Stage 3 found this stage easier to navigate. WWF-US and Conservation International were approved by the Accreditation Panel in June 2013. The agencies expected that Stage 3, which involved signing the

FPA agreement with the Trustee and a MoU with the GEF Secretariat, would take another month or two. However, the process took longer as the Trustee was revising its FPA agreement template (Table 3). The accredited applicants had to sign it unchanged. The experience in negotiating the MoU varied. WWF-US experienced some lack of clarity on the implications of the new policy changes approved by the GEF, however it was able to come to a quick agreement with the Secretariat.

97. In Conservation International's case, the signing of FPA went without any delay other than those related to updating of the FPA template. However, Conservation International reports some back and forth on signing of the MoU due to the Accreditation Panel report that called for an action that Conservation International thought was redundant. According to Conservation International, the Accreditation Panel report had identified a need for training on ESS for the WWF staff – apparently a typo – because of absence of safeguards experts in its meeting with the Panel. Conservation International, contested this assertion on account that during the accreditation Panel meeting Conservation International's safeguards experts were present. The Secretariat did not make the requested change, and Conservation International decided to undertake the training without contesting it further.

98. IUCN reported that for them Stage 3 was easier than the preceding stage. The DBSA experience on the other hand has been mixed. During Stage 2 of Accreditation, DBSA had chosen not to be reviewed for pest management safeguards as they had not fully understood the implications for choosing to be excluded for this set of safeguards and thought that these safeguards were not relevant to their work. However, during the process for negotiating the MoU with the Secretariat, DBSA realized that not being accredited for pest management safeguards would render it ineligible to implement any of the GEF projects on land degradation. There has been considerable back and forth between DBSA and the Secretariat on this topic and the issue is yet to be fully resolved as the safeguards on pest management adopted by the DBSA so far have been assessed by the Accreditation Panel to not be in full compliance with the GEF Standards. FUNBIO was approved by the Accreditation Panel in October 2014. While it signed the MoU in January 2015, it is yet to sign the FPA.

Table 3: Key dates for Stage 3*

Applicant	Date of Accreditation Panel Approval	Date of signing of MoU	Date of FPA agreement
WWF-US	June 14 th 2013	2 nd of October 2013	11 th December 2013
Conservation International	June 17 th 2013	22 nd Of October 2013	28 th January 2014
IUCN	May 21 st 2014	11 th June 2014	16 th July 2014
DBSA	May 19 th 2014	20 th August 2014	8 th of October 2014
FUNBIO	October 2014	22 nd January 2015	Not yet signed

*As on 15th April 2015

Communications

99. During the accreditation process the email communications among the Secretariat, applicants and the accreditation Panel, were channeled through the Secretariat's coordinator for the accreditation process. Formal assessment reports were sent to the agency with a letter from the GEF CEO, and for the most part responses to questions flowed through the Secretariat's coordinator for the accreditation process.

100. During Stage 1 of the process this allowed the Secretariat an opportunity to synthesize the feedback of the Value-added Panel members and send it in a single mail to the applicants. This approach worked fine at that point because the coordinator was knowledgeable on the criteria and standards used for the Value-added assessment. Moreover, the applicants did not perceive the Stage 1 application form to be complicated. As noted earlier, the Stage 2 application form was much more complicated given the underlying issues being tackled; therefore, during Stage 2 limitations of the Secretariat's approach to communication became apparent.

101. According to the applicants, one of the reasons for incomplete applications during stage 2 was lack of clarity in the questions on the application form. Another feature of the accreditation process that added to this particular challenge was the inaccessibility of the Accreditation Panel to the applicants due to the manner in which their communications with the applicants were structured. All communications from the applicants to the Panel were to be channeled through the Secretariat – the Secretariat did not allow the applicants to interact directly with Panel and vice-versa, except during the field verification. Providing detailed guidance on Stage 2 questions may have also helped the applicants. Several applicants reported that they had to seek help from their peers among other applicants to get a better understanding of what was being asked.

102. A reading of the Stage 2 application form indicates that the use of World Bank jargon – which was unfamiliar to most applicants – may have contributed to opacity of some questions. This could have been addressed by providing the applicants an opportunity upfront to clarify the questions with the Accreditation Panel. However, the perception that the questions in the Stage 2 application form are repetitive is not correct. Although several questions may have appeared to be similar, they were indeed different. Some of the applicants also pointed out that the absence of a recourse to contest an assessment provided by the Accreditation Panel was unfair.

103. The absence of an up-front opportunity during Stage 2 for the applicants to discuss the questionnaire with the Accreditation Panel and seek clarification meant that the issues on which applicants needed clarifications were greater than they otherwise would have been. However, having to go through the Secretariat for their queries to the Panel created a communications bottleneck. While the coordinator was able to respond to the questions related to GEF policies and procedures, for clarifications on technical questions the coordinator forwarded the applicant requests to the Panel members.

104. The Secretariat's justification of its communication approach is that this allowed them to filter the number of requests that went to the Panel and ensured that the Panel is shielded from political influences. It also helped them to be able to monitor the process. It is likely that overall the Secretariat's approach reduced the number of requests for clarification that went to the Panel somewhat, as the GEF coordinator also reported that all questions were passed on to the Panel. This approach also needs to be seen in conjunction with the lack of an opportunity for the applicants for an initial direct interaction with the Accreditation Panel on accreditation criteria and for seeking clarification. Thus, while due to the lack of this opportunity there was a greater need for email web-based or electronic interactions between the applicants and the Panel, given the regulated communications, the actual space for doing so was curtailed. The rationale that the shielding of the Panel protected their independence is not strong. Such protection – if at all required – is required once the Panel is undertaking reviews and not during the stage when applicants want to seek clarifications on questions.

105. The Evaluation team surveyed the email communications between the implementing agencies and the GEF Secretariat. It found that the key issues covered in these emails included: clarifications from the Panel, submission of the requested information, difficulties in accessing documents that were sent electronically, fees and costs, and logistics of the field visits.

106. The responses of the applicants and the Accreditation Panel members indicate the absence of an initial direct interaction to clarify doubts on questions included in the application form at the start of the Stage 2 may have added up to six months to the time taken in the accreditation of some of the applicants. Despite the design flaws in the GEF approach to communication, which led to frustrations and delays, the applicants and the Accreditation Panel members are unanimous in their appreciation for the timeliness and responsiveness of the Secretariat's coordinator for the accreditation process.

107. The evaluation did a brief assessment of the Adaptation Fund's accreditation process to obtain a better understanding of alternative ways to carry out an accreditation process. While an important difference between the Adaptation Fund and GEF process is that the Adaptation Fund does not address Environmental and Social Standards to the extent required by GEF, the approval process adopted by the Adaptation Fund gave more attention to clarifying early on questions related to their accreditation process. Given the argument that GEF accreditation criteria were more detailed and covered a wider range of issues, the case for providing an upfront face-to-face opportunity to the applicants to seek clarifications on the Stage-2 application was even greater. Given the proximity of the GEF and Adaptation Fund, a greater level of alertness to the relevant developments at the Adaptation Fund would have probably helped GEF plan its approach better.

Transparency and Fairness

Conclusion 5: The accreditation process is seen as having been designed transparently. The manner in which it has been implemented has also been largely transparent. However, there are some areas where the process is perceived as having been unfair by the applicants.

108. The general perception of the applicants and of the stakeholders involved in the development of the GEF approach to accreditation and implementation was that the process was designed in a transparent manner and—to a large extent—implemented in that manner. Easy availability of forms and relevant documents and timely reporting of progress to the Council were perceived as having made the process more transparent. However, the evaluation assesses the treatment of cost recovery in the accreditation-related GEF documents to be less transparent. Similarly, the applicants did not know how their responses would be assessed and what the expected performance/compliance thresholds were for many questions.

Criteria and Procedures

109. Overall, the stakeholders perceived that the criteria and procedures for the accreditation process were developed following a transparent process. Involvement of the Council Sub-committee, the Secretariat, and subject area experts in designing the process lent it legitimacy. Moreover, the discussions during the meetings of the Sub-committee and feedback provided by different stakeholders are well documented. It is easy to trace why some design choices were made and how the eventual position of the Sub-committee on a given issue evolved.

110. The provision for acquiring the required expertise to aid development of the criteria and procedures was also perceived to have added to the transparency of the process. The criteria had been designed before the start of the accreditation process and these were known to the applicants. They, however, did not know how their responses would be rated by the Value-added Panel and by the Accreditation Panel. The Accreditation Panel was behaviorally independent of the Secretariat, and was perceived as such by the applicants.

111. Several members of the panel for the Value-added assessment (Stage 1) felt that to some extent transparency in assessments undertaken during this stage was compromised because for the majority of questions expected performance thresholds (corresponding to a rating) had not been specified. As a result, there was some subjectivity in rating an applicant's response to such questions.

112. The evaluation team assesses that the GEF discourse on cost coverage should have been more transparent. None of the GEF accreditation policy documents provided a description of the entire range of costs that would be incurred by the GEF on the accreditation process. Compared to the GEF approach, the Green Climate Fund policy of accreditation fees describes the costs incurred in a more comprehensive manner. The GCF 'Policy on Fees for Accreditation' (GCF/B.08/04), approved by the GCF board in October 2014 (GCF/B.08/45), explains that "Costs associated with the accreditation process will include the cost of the Accreditation Panel review, cost of the decision-making process by the Board, and related costs undertaken by the Secretariat." The paper further indicates that GCF policy would be to recover costs taking into account the financial capacities of the applicants and it "aims at contributing to covering the costs from the accreditation process." This shows that while the manner in which GCF has defined the cost is much broader than GEF, GCF aims at partial recovery compared to GEF where the aim was to make the entire

accreditation process cost neutral. Thus, the discussion on accreditation costs in the relevant papers of the GCF is more transparent.

Implementation

113. Most of the applicant entities perceived the process to be transparent and fair. Some of the applicants had reservations on some aspects of the process. Applicants found all the documents that they needed to prepare their applications were easily accessible at the GEF website. The applicants perceived the Panel to be independent of the Secretariat which made their reviews transparent and also increased the credibility of the assessments. The timely reporting of the progress of the process to the GEF Council and the uniform and publicly known accreditation criteria were perceived to have added to the transparency of the process. Some applicants were also able to appreciate the inherent difficulties in setting up a pilot. They acknowledged that there was a steep learning curve for every one that was involved and that without experience it is difficult to design a flawless process.

114. The applicants generally perceived the Value-added review carried out by the Secretariat to be fair. This also includes the three applicants that were not recommended by the Secretariat for Council approval. The perceptions on the Stage 2 reviews are more varied. One of the applicants felt that on a few occasions the Panel stepped out from their role of trying to assess policy gaps to trying to push the applicant towards making specific policy changes. One applicant also felt that implications of not getting accredited for the pest management criteria included in the ESS was not explained to them. At least two applicants felt that the some of the amounts charged for reviews and field visits were not fully explained to them.

115. Some applicants felt that amount of documentation and translations that they were expected to present was excessive. Another cause of frustration for some was lack of clear timelines for accreditation review feedback. Several applicants pointed out that the deadlines and urgency for response was determined solely based on the Secretariat's priorities. They felt that when a GEF Council meeting or the GEF Assembly was on the horizon, there was a lot of push from the Secretariat on the applicants to meet the tight deadlines however on other occasions this attention would slacken off.

116. In Stage 2, almost all the disagreements with the Panel's assessment were related to the ESS. Some applicants feel that the Accreditation Panel was not flexible and adopted a narrow interpretation of the GEF ESS. These applicants feel that the Panel should have given more attention to whether a given criteria was relevant the given context. Other applicants thought some of the safeguards were inapplicable to them or their work. For instance, FUNBIO, CI and IUCN felt that it was unnecessary to ask them to have a safeguard for natural resources as – given their mandate – they do not undertake activities that could cause damage to natural resources. Similarly, IUCN reported that it funds conservation projects that do not have negative impacts on the environment or people. As undertaking high risk projects such as building dams, forest plantations, and intensive agricultural development do not fall under its mission, the application of many of the safeguards was unnecessary. While it is true that in most instances these agencies would probably not undertake activities that would pose environmental and social risks, it is difficult to ascertain that this is indeed the case without having robust safeguards in place.

117. WWF on the other hand felt that it was not accredited for certain safeguards, such as 'safety of dams' and 'cultural and physical resources' for which it could have been.

Onboarding of new Agencies

118. The GEF Secretariat has organized training for all of the newly accredited Project Agencies. All four Project Agencies had attended the GEF Secretariat training that aimed at familiarizing the agencies with GEF policies and practices on a wide range of issues. Interviewees from accredited Project Agencies noted that these trainings have been very useful and well organized. The participants from the Project Agencies in general feel that these trainings were useful in familiarizing them with GEF programs and provided them a forum to facilitate an exchange of ideas and experiences among peers from other agencies.

119. Project Agencies report that information is readily available on the GEF website for the development of new projects, but lack of an up-to-date GEF Operations Manual was reported as an information barrier for agencies. Participants of the GEF training for new Project Agencies felt that they still face challenges in term of knowing the extent to which they have latitude in developing proposals (for example, what is mandatory and what is not), and who the relevant contacts are within the GEF for different issues. They also felt a need for more clarity on issues related to agency fee, cancellation, and return of GEF money to the Trustee on cancellation; and for negotiations, or discussions between GEF Secretariat Staff, Operational Focal Points and GEF Agencies.

120. In terms of the extent to which Project Agencies have clarity on their role as implementing agencies, the perspectives Project Agencies and the project reviewers at the GEF Secretariat differ somewhat. Agencies report that they have had clarity on their role as an implementing agency but simply lack experience. Project proposal reviewers, on the other hand, feel that some agencies are having difficulty understanding their role as a GEF Project Agency. For example, they are reluctant to let other agencies execute projects implemented by them.

121. Project Agencies reported that they have had positive experiences developing projects. One agency said that “interactions with the respective program managers on upstream consultations on project ideas (pre-PIF) have generally been prompt and professional,” and that GEF Secretariat staff had been very helpful. Another said that “consultations upstream on project ideas and draft PIFs are very useful.” Another agency noted that compared to donors which have very specific and intrusive requirements for proposals, they have found the GEF to be “not as much of an invasive donor”, and that it has taken them time to adapt to the flexibility they have with the GEF project preparation process.

122. In terms of advice and guidance received from the GEF Secretariat on project preparation, one agency mentioned that the practice of sharing early concepts upstream with the Secretariat for comment before Operational Focal Point (OFP) endorsement may be more useful than receiving their informal feedback only after OFP endorsement to a PIF as the latter eliminates the chance to incorporate GEF Secretariat inputs early on in concept development. From interviews it appears that this policy is not universal, as another agency noted that whether interaction with GEF Secretariat happen before or after the interaction with the OFP depends on whether or not the OFP wants a project prepared on a priority topic or area. In general, agencies agree that when they share a PIF idea with the relevant program manager at the GEF Secretariat for upstream consultations, they do provide feedback which saves a lot of time.

123. One of the criteria for Value-added assessment for Stage I of the accreditation process was whether and the extent to which the applicant agency had experience of executing GEF projects.

Thus, those that were accredited in general had experience of executing GEF projects. Some Project Agencies had difficulty appreciating the difference between their role as executing agencies and in their new role as implementing agencies – and the importance of the separation of these two roles. Similarly, the project reviewers also felt that the Project Agencies may also be reluctant to have the project implemented by them to be executed by other agencies. The only clear exception among the existing Project Agencies is DBSA, which is a development bank and usually does not execute projects. Consequently, its project ideas have been more consistent with the distinguished roles and responsibilities of implementing agencies.

124. Reviewers feel that the Project Agencies face challenges in terms of structuring project proposals and adapting them to the changes in GEF strategies for GEF-6. Similarly, the initial PIF submissions from the Project Agencies were not concise leading to a lot of back and forth with the Secretariat. Both project proposal reviewers and Project Agencies noted that the lack of an updated GEF operations manual has been a constraint for new Project Agencies, who lack clarity on issues such as the PIF timetable, for example. Reviewers noted that this lack of institutional memory has been bridged somewhat in WWF and Conservation International, where former GEF staff were recruited.

125. Another weakness in project proposals from Project Agencies, as reported by some reviewers, is that these usually don't have a clear log-frame – causal chain – concept embedded in the project and M&E designs unlike the proposals from GEF Agencies where these approaches have been mainstreamed for long.

126. While project reviewer expressed confidence in the accreditation process to ensure that the accredited agencies are in compliance with the relevant GEF policies and standards, they also acknowledged that so far there is little implementation experience to comment on how these policies and standards would be implemented on ground. Nonetheless, they also clarified that this does not affect the way in which they review the proposals from the Project Agencies as it not part of review criteria.

127. Some reviewers noted that the Project Agencies, especially International NGOs, have less experience of engaging with the government in a manner that the GEF Agencies are able to do. In some countries, the history in policy advocacy of some Project Agencies might cause difficulties in working with government on policy reforms. This constraint is likely to be mitigated with greater exposure through GEF partnership, however, given the differences in the institutional make-up, this might not go away entirely.

128. Overall, based on the reflections of the GEF Secretariat's project reviewers and Project Agency staff, it seems that upstream consultations are playing an important role in bridging the institutional experience gap between the GEF Project Agencies and GEF Agencies. Their proposals in general are perceived to be technically strong, with adequate field presence to support implementation. Nonetheless, they need to be brought up to speed on M&E related issues. However, it also needs to be noted that the perspective of the project reviewers is primarily based on their experiences with the proposals and project ideas from the three international NGOs – which were the first to become GEF Project Agencies. As GEF partnership broadens further there would be much greater diversity in the experiences.

129. In summary, although most applicants perceived the accreditation process to be fair, some of them did expressed some concerns. The expressed concerns include: accreditation criteria and questions were not always applicable; limited access to communicate with the Accreditation Panel; amount of document translations requested from the applicants from the non-English speaking countries; and, lack of a forum to contest the decisions of the Panel.

Cost of Accreditation Process

Conclusion 6: *The accreditation process has so far been costlier than expected. Applicants incurred much higher costs than the accreditation fees, and the cost incurred by the GEF has been substantially higher than that recovered through fees. Some of the cost recovery–related rules established during design added to delays.*

130. The discussion in this section distinguishes the cost of the accreditation process from the long term costs (and benefits) of broadening the partnership. The cost of the accreditation process is also distinguished from the cost of establishing the criteria and procedures for accreditation. The costs for establishing criteria and procedures, although significant, are upfront costs of developing a pilot. At most these need to be amortized only partially during the pilot as the same criteria and procedures may be used in future with minor modifications and little additional costs. The upfront costs of developing a pilot have been ignored in this analysis.

131. The GEF approach to cost of accreditation process pursued cost neutrality as an objective. Another purpose was that the accreditation fees would act as a filter – they would preempt applications from the non-serious entities but would not be a barrier for the targeted entities. The paper, ‘*Broadening the GEF Partnership Under Paragraph 28 of the GEF Instrument*’ (GEF/C.40/09) presented to the Council in May 2011 noted that “the Applicants will pay a fee sufficient to cover the cost of the Accreditation Panel Review, including associated Secretariat costs. This is important for enabling this reform to be cost neutral to the GEF.” A year earlier, the Grant Thornton report had made a case for the applicants covering the costs incurred by the GEF on the accreditation process. The analysis presented in the Grant Thornton report indicated that for a desk review of accreditation application by a four member expert panel for a week, an expenditure of US \$ 25,000 would be incurred. The additional review that involves an in-country visit may entail further costs of about US \$ 75,000. Thus, the accreditation process may cost GEF about US \$ 100,000 per agency. Eventually, instead of the four-member panel suggested in the Grant Thornton report, the GEF settled for a three-member Accreditation Panel.⁴⁰ Further, the Value-added review was turned into a separate exercise. Nonetheless, the base accreditation fee of US \$ 25,000 remained unchanged.

132. The actual GEF approach to accreditation costs took into account the analysis presented in the Grant Thornton report, but there were some important departures. The explanation provided in the paper on broadening of the GEF partnership (GEF/C.40/09) clarifies that the fees charged from the applicants will cover only the costs incurred in the Stage 2 of the GEF accreditation process – although as noted earlier the paper also underlines the importance of the reform to be cost neutral to the GEF. The coverage specified in the paper is narrower than had been proposed in earlier proposals. Within Stage 2, the actual approach to cost of accreditation process focused entirely on meeting the costs of the Accreditation Panel for review of the applications. Other costs such those

⁴⁰ GEF/C.39/8/Rev.2, Accreditation Procedure for GEF Project Agencies, pg. 8

for the kick-off meeting of the Accreditation Panel, for providing support to the Panel and the applicants, were not covered.

133. Table 4 compares the approach of three funds – Adaptation Fund, GEF and GCF – to recovering the costs incurred on accreditation. The Adaptation Fund does not require applicants to pay fees for accreditation. GCF has fee slabs based on the maximum GCF funding that could be involved in a project implemented by the given accredited agency. For a given slab, there is a fixed fee that cover two reviews after which the fee becomes variable based on the estimated expenses for additional reviews. GEF does not make a distinction among the agencies based on the project size caps. The US \$ 25,000 fee suffices only for the first desk review. Thereafter, the applicants need to pay for additional reviews on a case by case basis.

Table 4: Approach to Accreditation Costs

Fund	Accreditation Fees	Costs included in the accreditation fees	Costs NOT included in accreditation fees
AF	None	—	Accreditation Panel, field visits, AF staff time, Panel meetings
GCF	USD 1,000 - 46,000 + additional fees for more than two reviews	Partial costs for: Accreditation Panel, travel for field visits, Board time for decisions, Secretariat staff time	Partial costs for: Accreditation Panel, travel for field visits, Board time for decisions, Secretariat staff time
GEF	USD 25,000 + costs for further reviews + costs for field verification	Accreditation Panel reviews, field verification including travel costs.	Stage I panel, Secretariat staff time and travel cost for field visits, Accreditation Panel meetings, post-accreditation training

Table 5: Actual Fees Paid by the Applicants

Agency	Nos. of Stage II Reviews	Field Visits	Nos. of Stage II Submissions	Stage 2 Status	Total Fee Paid (USD ' 000)
WWF-US	3	1	5	Accredited	49
CI	2	1	4	Accredited	43
IUCN	2	1	8	Accredited	66
DBSA	3	1	8	Accredited	71
FUNBIO	3	1	6	Accredited	76
CAF	4	1	6	Under review	62
FECO	5	1	6	Under review	114
BOAD	4	0	5	Under review	52
VTB	1	0	5	Withdrawn	25
IFRC	1	0	2	Rejected	25
FONAM	1	0	2	Rejected	25
Total					608

(Up to March 31st 2015, number of Stage II submissions and partial submissions is up to October, 2014)

134. Table 5 presents the actual fees paid by the applicants for the Stage 2 of the GEF accreditation process. The total fees charged ranges from US \$ 114,000 for FECO, which has already gone through five reviews and a field visit, to US \$ 25,000 for VTB, IFRC and FONAM whose applications were either rejected or were withdrawn. Thus, actual total fees for the applicants has been quite close to what the Grant Thornton report had projected, although the report – as discussed earlier - had based its assessment on a much wider coverage of costs but fewer iterations of reviews.

135. The actual aggregate costs for GEF Secretariat, which also includes the cost of the Accreditation Panel reviews, is estimated to be about US \$ 1.53 million (Table 6). Thus, the actual costs of accreditation to the Secretariat have been roughly about two and a half times the total fees (US \$ 608,000) paid by the applicants. Most of the accreditation expenditure that was not covered by the fees received from the applicants (\$921,000) pertains to the salaries of the Secretariat staff involved in accreditation and was covered by the Secretariat's corporate budget.

Table 6: Actual costs of accreditation to the GEF⁴¹

Total Spending by the GEF Secretariat in USD '000 (2011-2014)	
Stage 1	276
<i>GEF Secretariat staff salary</i> ⁴²	183
<i>GEF Secretariat Value-added Panel</i>	93
Stage 2	1253
<i>GEF Secretariat staff salary</i>	588
<i>GEF Staff field visits</i>	23
<i>Accreditation Panel travel cost for meetings</i>	34
<i>Accreditation Panel + field visits</i>	608
Total Costs for Accreditation Process	1529

(Up to March 31st 2015)

136. Cost incurred by the applicants is the other side of the coin. During the Council Sub-committee meetings one of the participants noted that the costs for an applicant may range from US \$ 100,000 to US \$ 300,000.⁴³ The information gathered as part of this evaluation shows that the actual costs for the applicants were substantially higher than the fees. For the five applicants that have cleared the Stage II of the accreditation process, the accreditation fee ranges between US \$ 43,000 and US \$ 76,181, and the additional costs incurred for accreditation are generally in the range of US \$ 200,000 to US \$ 500,000 (table 7). The additional costs include expenditure on the staff salaries, travel, training, and preparation of documents for application and for some of the agencies resources spent on translations. On average the accreditation fees paid by these applicants were less than 15 percent of the total costs incurred by them on accreditation. It also shows that

⁴¹ The amounts included in the estimates are not restricted to the corporate budget of the Secretariat. Accreditation Panel were paid from a separate account. Their fees and traveling expenses have been included as these were incurred as part of the accreditation process and were paid for by the applicants.

⁴² From October 2011 to June 2012.

⁴³ One of the earlier drafts of the '*Minutes of the first meeting of the Council Sub-committee. September 3rd 2010*' provides this information. The information that this was discussed was edited out in the final version of the minutes. The evaluation team has used the draft document as a basis for this point. The working assumption being that while the information provided in the draft version was not false the final version focused more on information that was linked to action points and decisions taken and did not present the full details of the discussions that took place.

overall the total costs incurred by the applicants on accreditation was much higher than the total costs incurred by the GEF.⁴⁴

Table 7: Cost of Accreditation to the Applicants

Agency	Total Fee Paid (in US \$ '000)	Additional estimated costs⁴⁵ (in US \$ '000)
WWF-US	49	≈ 500
CI	43	≈ 400
IUCN	66	≈ 400
DBSA	71	≈ 200
FUNBIO	76	≈ 500

137. As is clearly evident for this analysis, the actual costs of accreditation for applicants and the secretariat were significantly higher than expected. One of the implicit purposes of having a fee was also to preempt non-serious applicants from applying. It is, therefore, opportune to consider the design of the approach to accreditation costs from efficiency perspective. The US \$ 25,000 fees was paid upfront and sufficed for the first desk review of the application by the Accreditation Panel. Thereafter, if an additional review and/or field verification was required the applicants would submit a revised application. After the revised submission was received from an applicant, the Panel would assess the time it would take each of the Panel members to review these documents and based on this the Panel would arrive at an estimate of the costs involved in conducting the review. Based on the inputs received from the Panel, the Secretariat would send a request for additional fee to the applicant. The applicant on receipt of the estimate would deposit the additional fee to the Secretariat and, thereafter, the required additional review and/or field verification would take place. Each time a request for additional fees was made to an applicant, time was spent in estimation of the additional costs, in requesting additional fees, and submission of additional fees by the applicant on receipt of the request. Each iteration of such requests added about a week to a month and a half to the Stage 2 application review process. The GEF approach to charging fees upfront for only the first review is different from the approach of the GCF where the upfront fees suffice for the first two reviews. The GCF approach avoids sending the request for additional fees for another iteration of the review. What also facilitates this is that GCF has based its accreditation process on the principle of partial recovery.

Long term business case

138. The GEF-5 replenishment participants believed that if structured properly, the broadening of the GEF partnership could reduce the overhead costs of resource delivery. This expected efficiency gain was one of the key pillars for the business case for broadening of the GEF partnership. The Grant Thornton report's (GEF/C.38/Inf.10) projection on cost and benefits of accreditation for the GEF-5 period suggested that the increased costs for GEF Trustee and Secretariat would be more than compensated by the benefits, and that the net benefits for the GEF-5 period may range from

⁴⁴ The total estimated expenditure for the Secretariat was about US \$ 1.39 million where as it was about US \$ 2.30 million for the five applicants that cleared the Stage 2. Since there are six others applicants whose costs have not been included, the total expenditure to date for the applicants is expected to be substantially higher than US \$ 2.30 million.

⁴⁵ Estimates of additional costs for applicants includes staff time dedicated to accreditation, travel, training, documentation and translation related expenditure for Stage I and II. In some instances estimates provided by the applicants have been used. In other instances the evaluation team made the calculations based on the information provided by the applicants. While the numbers of fee paid by the applicants are precise, the numbers for additional estimated costs are indicative.

US \$ 1.1 million to 1.6 million. The Grant Thornton report made several assumptions including that the portfolio share of the Project Agencies for the GEF-5 period is at least 10 percent and their project fees are limited to 9 percent compared to 10 percent for the GEF Agencies. Further, it assumed that the costs contingent on the GEF IEO would be negligible. It lists several non-monetized benefits including, but not restricted to, efficiency gains in project administration, increased sustainability of supported activities, and access to new expertise.

139. The actual experience has been in variance with the expectations. Firstly, only 10 projects that account for US \$ 47 million in GEF grant with Project Agencies as implementing agencies were approved in GEF-5. This is less than 1.5 percent of the GEF-5 portfolio for the replenishment period. Secondly, although the Grant Thornton report had assumed the Agency Fees for the GEF Agencies to be 10 percent, the fees were later reduced to 9.5 percent for the grants of up to US \$ 10.0 million and 9.0 percent for grants of over US \$ 10 million.⁴⁶ A key distinction between the GEF Agencies and Project Agencies is that the former are mandated to provide corporate services whereas the latter are not. The effective Agency fee rate for the GEF Agencies from July 2012 onwards has been 9.3 percent.⁴⁷ Compared to this the actual effective rate for the Project Agencies at 9.0 percent is marginally lower. Even if it is assumed that savings on account of the absence of a mandate for Project Agencies to provide corporate services are real savings, the gross savings for the GEF-5 period are US \$ 141,000, much lower than the projected gross saving of US \$ 2.7 million for the period.⁴⁸ The projections for long term costs in the Grant Thornton report at US \$ 1.1 million to 1.6 million are of a much higher order. Even if the actual costs end up being significantly lower for the GEF-5 period, it is unlikely that there will be any material savings on this account.

140. It should be noted, however, that although the Grant Thornton report considered the benefits only for the GEF-5 period, there is no reason why these benefits would be restricted to this period. Further, this does not preclude the potential for net efficiency gains through lower cost of project administration, better prospects for follow-up on project activities (increased sustainability), and new expertise and geographical diversity. The evidence gathered for the evaluation shows that these advantages, although difficult to monetize, are plausible. Nonetheless, it is still too early to make a more conclusive statement on long term costs and benefits of inclusion of Project Agencies in the GEF partnership.

Lessons

141. The purpose of the GEF Accreditation Pilot was to generate lessons that may shape future GEF approach to broadening its partnership. The experience so far has indeed generated several lessons and has fostered learning across and beyond those involved in the GEF accreditation process.

142. The Pilot has helped the applicants take a critical look at their policies and practices related to ESS, fiduciary standards, and gender mainstreaming. In several instances it has led to policy reforms within the applicant organizations. The new Project Agencies are now gaining experience in designing GEF projects and catching up with the GEF Agencies. Among external stakeholders,

⁴⁶ For programmatic approaches where the child projects are approved by an executive board, the Agency Fee was lower at 8 percent up to October 2014. Thereafter, the difference in the fees for programmatic approaches and standalone projects has been abolished and rules applicable to standalone projects are now applied to programmatic approaches as well.

⁴⁷ This excludes the agency fee for Small Grant Programme at 4.0 percent Agency fee rate paid at the central level, but includes the STAR allocations for Small Grant Programme at 8.0 Agency fee rate paid by the countries.

⁴⁸ 0.3 percent * US \$ 47 million = US \$ 141,000

the Green Climate Fund has used lessons from the GEF experience—along experiences from other organizations—in designing its approach to accreditation.

143. The GEF should consider the pros and cons of whether the accreditation process needs to be more calibrated to take into account the characteristics of the applicant organizations, without compromising GEF requirements. At a finer scale level, the criteria and questions for accreditation need to be better defined and articulated, and the expected performance thresholds of the ratings need to be specified.

144. One of the expectations from broadening of the GEF partnership was that it will lead to efficiency gains. It is difficult to conclude on this issue. What is clear is that the short term costs of the accreditation process have been considerably higher than expected. However, it's also true that the long term advantages are likely to be in terms of speedier project cycles and field presence in difficult to operate geographical contexts. These advantages are difficult to monetize but may be tracked. Focusing on full cost recovery for a part of the process without fully appreciating the costs incurred during the entire accreditation process led to choices that increased the overall cost and also contributed to delays. Had the policy discussion during planning on the costs of accreditation taken into account the entire process, more appropriate policy choices—even if they led to lower fees—might have lowered overall costs.

145. Up front face-to-face interaction of the Accreditation Panel with the applicants to discuss the accreditation criteria and application forms is likely to fill in information gaps, which caused some delay during the Pilot. Provision for an upfront face-to-face interaction between the applicants and Panel is something to be considered if the GEF chooses to mainstream the pilot.

146. As also noted in OPS-3 and OPS-5 the GEF partnership is evolving and is becoming increasingly complex. From a clear comparative advantage based functioning, the partnership is now more oriented towards competition. While this does provide countries greater choice, it also means that GEF funding would be implemented through partners that are likely to have smaller GEF portfolios and might be difficult to monitor. This would require the GEF Secretariat to give more attention to the project review and monitoring processes. It will make evaluation of agency performance more difficult for the GEF IEO. It also means that the original agencies such as World Bank may be less willing to invest heavily in aligning with the GEF environmental objectives and operations.

147. The Secretariat is already putting several of these lessons into practice. It is giving considerable attention to onboarding of the Project Agencies through training and upstream consultations on development of project proposals. These measures are likely to help the Project Agencies in being more efficient and effective in developing and implementing GEF projects.

References

1994. Global Environment Facility (GEF) [“Collaboration between the World Bank and Regional Development Banks in GEF Implementation: A Status Report”](#) GEF/C.2/inf.2
2006. GEF Independent Evaluation Office (GEF IEO) [“Evaluation of the Experience of Executing Agencies under Expanded Opportunities in the GEF”](#) (GEF/ME/C.30/4)
2005. The World Bank Operations Manual Operational Policies, [“Piloting the Use of Borrower Systems to Address Environmental and Social Safeguard Issues in Bank-Supported Projects”](#) OP 4.00
- 2005/2008. OECD [“The Paris Declaration on Aid Effectiveness and the Accra Agenda for Action”](#)
2006. GEF [“Roles and Comparative Advantages of the GEF Agencies”](#) (GEF/C.30/9),
2006. GEF [“Joint Summary of the Chairs – GEF Council Meeting. December 5-8, 2006”](#)
GEF/C.30/JointSummary
2007. GEF [“Recommended Minimum Fiduciary Standards for GEF Implementing and Executing Agencies”](#)
GEF/C.31/6
2009. GEF [“Expanded Opportunities for Executing Agencies: Recent Efforts and Current Proposals to Expand Opportunities for Regional Development Banks”](#) GEF/C.13/3
2009. GEF [“First Meeting for the Fifth Replenishment of Resources of the GEF Trust Fund, Paris, France March 17-18, 2009 Summary of the Co-Chairs”](#)
2009. GEF [“Draft GEF Policy, Institutional, and Governance Reforms”](#), GEF/R.5/15
2009. GEF, [“Issues for the Strategic Positioning of the GEF”](#) GEF/R.5/16
2009. GEF [“Comments Received from the GEF Implementing Agencies on Documents Prepared for the Fourth Meeting for the Fifth Replenishment of the GEF Trust Fund”](#) GEF/R.5/Comments/1
2009. GEF [“Comments Received from the GEF Executing Agencies on Documents Prepared for the Fourth Meeting for the Fifth Replenishment of the GEF Trust Fund”](#) GEF/R.5/Comments/2
2009. GEF [“Special Themes for the GEF-5 replenishment”](#) GEF/R.5/6
2009. GEF [“Report on the Pilot Accreditation of GEF Project Agencies”](#) GEF/C.44/09
2010. GEF [“Accreditation Procedure for GEF Project Agencies”](#) GEF/C.39/7/Rev.2
2010. GEF [“Broadening the GEF Partnership by Operationalizing Paragraph 28 of the GEF Instrument”](#)
GEF/C.38/8
2010. GEF [“Joint Summary of the Chairs, Special GEF Council Meeting, May 24, 2010”](#)
2010. GEF [“Joint Summary of the Chairs – GEF Council Meeting June 29- July 1, 2010”](#) GEF/C.38/Joint Summary

2010. GEF “[Policy Recommendations for the Fifth Replenishment of the GEF Trust Fund](#)”
GEF/R.5/32/CRP.1, Annex 2, GEF/A.4/7

2010. United Nations Framework Convention on Climate Change (UNFCCC) “[Report of the Conference of the Parties on its fifteenth session, held in Copenhagen from 7 to 19 December 2009](#)”
FCCC/CP/2009/11/Add.1

2010. GEF IEO “[GEF Annual Performance Report 2009](#)” Evaluation Report No. 57

2010. Grant Thornton, LLP, “[Broadening GEF Executing Entities: Assessment of Cost Benefits Analysis and Risk-Based Evaluation and Accreditation of New GEF Executing Entities](#)” GEF/C.38/In.10

2010. GEF “[Highlights of Council Discussions - – GEF Council Meeting June-July 2010](#)”
GEF/C.38/Highlights

2010. GEF & World Bank as Trustee “[Summary of Negotiations Fifth Replenishment of the GEF Trust Fund](#)” GEF/A.4/7

2010. Independent Evaluation Group, World Bank, IEG Study Series “[Safeguards and Sustainability Policies in a Changing World, An Independent Evaluation of World Bank Group Experience](#)”

2011. GEF “[Broadening the GEF Partnership Under Paragraph 28 of the GEF Instrument](#)” GEF/C.40/09

2011. GEF “[GEF Policy on Agency Minimum Standards on Environmental and Social Safeguards](#)”
GEF.C.41.10.Rev.01

2011. GEF “[Joint Summary of Chairs – 40th GEF Council Meeting. May 24-26, 2011](#)”

2012. GEF “[Procedure: Accreditation of GEF Project Agencies](#)” PR/IN/04

2012. GEF “[Secretariat Recommendations of Project Agencies for Accreditation](#)” GEF/C.42/09/Rev.01

2012. GEF “[Joint Summary of the Chairs – GEF Council Meeting. June 5-7, 2012.](#)”

2012. GEF “[Accreditation to the Global Environment Facility \(GEF\), How Your Institution Can Become a GEF Agency and Have Direct Access to GEF Funding](#)” Brochure

2013. GEF IEO “[Mid-term Evaluation of the System of Transparent Allocation of Resources](#)”
GEF/ME/C.45/04

2013. Independent Evaluation Group, World Bank, Global Program Review “[The World Bank Group’s Partnership with the Global Environment Facility](#)” Volume 1: Main Report

2013. GEF “[Progress Report on the Pilot Accreditation of GEF Project Agencies](#)” GEF/C.45/12

2013. “[Memorandum of Understanding between World Wildlife Fund, INC. United States and The Secretariat of the Global Environment Facility, October 2, 2013](#)”

2013, “[Memorandum of Understanding between Conservation International Foundation and the Secretariat of The Global Environment Facility October 22, 2013](#)”

2014. “[Memorandum of Understanding between IUCN, International Union for Conservation of Nature and Natural Resources and The Secretariat of the Global Environment Facility, June 11, 2014](#)”

2014. GEF Council “[JOINT SUMMARY OF THE CHAIRS, 47th GEF Council Meeting, October 28-30 2014](#)”

2014. Green Climate Fund (GCF) “[Decisions of the Board- Eighth Meeting of the Board, 14-17 October 2014](#)” GCF/B.08/45

2014. GCF “[Policy on Fees for Accreditation](#)” GCF/B.08/04

2014. World Bank “[World Bank Environmental and Social Framework, Setting Standards for Sustainable Development. First Draft for Consultation](#)” Report No. 89813

2014. GEF “[Progress Report on the Pilot Accreditation of GEF Project Agencies & Timeline for Further Discussion of Accreditation](#)” GEF/C.47.10

GEF Website “[Accreditation of GEF Project Agencies](#)”

Other Background Documents Reviewed:

Email Correspondence between Applicant Agencies and GEF Secretariat, October 2011-March 2015

GEF, [Stage 1 Application Form Template](#)

GEF, Stage 1 Value Added Panel Review Documents

GEF Accreditation Value-Added Review Guidelines

GEF, [Stage 2 Application Form Template](#)

GEF, Stage 2 Panel Reviews

Task Force of Experts and Subcommittee Meeting Notes:

2010. GEF Secretariat “Report of the First Meeting of the Task Force August 30.2010” Andrew Velthaus, (Summary of Task Force meeting August 26th, 2010)

2010. “Summary of Paragraph 28-Subcommittee Meeting of September 3 2010”, Andrew Velthaus, GEF Secretariat

2011. “Summary of Meeting of GEF Council Subcommittee on Broadening the GEF Partnership January 13, 2011”, Andrew Velthaus, GEF Secretariat

2011. “Summary of Meeting of GEF Council Subcommittee on Broadening the GEF Partnership March 10, 2011” Andrew Velthaus, GEF Secretariat

2011. “Summary of Meeting of GEF Council Subcommittee on Broadening the GEF Partnership April 14, 2011” Andrew Velthaus, GEF Secretariat

ANNEX 1: LIST OF RESPONDENTS

Trustee	
Praveen Desabatla	Interview, January 13 th , 2015
Maria Dakolias	Interview, April 1 nd , 2015
GEF Secretariat	
Ramesh Ramankutty	Interview, December 18 th , 2014 & April 14 th , 2015
Andrew Velthaus	Interviews on November 25 th , 2014 & February 12 th , 2015
Yasemin Biro	Interviews on December 3 rd , 2014 with Elwyn Edward Grainger-Jones, February 5 th with Seo-Jeong Yoon, & March 10 th , 2015
Elwyn Edward Grainger-Jones	Interview, December 3 rd , 2014 with Yasemin Biro
Seo-Jeong Yoon	Interview, February 5 th , 2015 with Yasemin Biro
GEF Secretariat Value Added Panel	
Ibrahima Sow	Interview, February 17 th 2015
Christian Holde Severin	Interview, February 25 th , 2015
Saliha Dobardzic	Interview, February 26 th , 2015
Ian Gray	Interview, February 27 th , 2015
Henry Salazar	Interview, March 24 th , 2015
William Ehlers	Interview, April 9 th , 2015
GEF Secretariat Project Proposal Reviewers	
Leah Bunce Karrer, GEF Secretariat	Interview, February 20 th , 2015
Mark Zimsky, GEF Secretariat	Interview, February 24 th , 2015
Ulrich Apel, GEF Secretariat	Interview, February 11 th , 2015
Yoko Watanabe, GEF Secretariat	Interview, March 4 th , 2015

Accreditation Panel	
Sherif Arif	Teleconference, March 5 th , 2015
Barbara Scott	Written Response, March 6 th , 2015
Mario Epstein	Written Response, March 8 th , 2015
Task Force Expert	
Peter Maertens, Task Force Expert	Teleconference, March 24 th , 2015
Operational Focal Points	
Zaheer Fakir, South Africa	Interview, February 20 th , 2015
Bhuban Karki, Under Secretary MOF, Nepal,	Written response, March 3 rd , 2015

Applicants		
GEF Project Agencies		
CI	Lilian Spijkerman	Interview, January 9 th , 2015 (with Orissa Samaroo)
	Orissa Samaroo	Interviews on January 9 th , 2015 (with Lilian Spijkerman) & March 6 th , 2015 (with Marion Deuodon & Kelly Polk)
	Marion Deuodon	Interview, March 6 th , 2015 (with Orissa Samaroo & Kelly Polk)
	Kelly Polk	CI Meeting, March 6 th , 2015 (with Marion Deuodon & Orissa Samaroo)
WWF-US	Herve LeFeuvre, Senior Director, WWF GEF Agency	Written Responses, March 24 th , 2015 & March 30 th 2015
IUCN	Jean-Yves Pirot	Teleconferences on 8 th of January 2015 & March 4 th 2015 & written response March 5 th , 2015
DBSA	Nomsa Zondi	Interview, February 17 th , 2015
	Noluthando Moledi (Debbi),	Interview, February 18 th , 2015
	Hein Prinsloo	Interview, February 20 th , 2015
	Michelle Layte, DBSA Green Fund Secretariat Manager	Interview, February 20 th , 2015
In Accreditation Process		
FUNBIO	Rosa Lemos de Sá, Secretária Geral – CEO	Teleconference, March 17 th 2015
CAF	René Gómez-García, CAF PhD., Ejecutivo Principal / Ambiente y cambio climático	Written Response, March 27 th , 2015
FECO	Yan Wei (Ms.), GEF Implementation Office, Foreign Economic Cooperation Office	Written Response, March 10 th 2015

Unsuccessful Applicants		
VTB, withdrew	Vladimir Litvak	Teleconference, March 3 rd , 2015
FONAM	Julia Justo Soto	Teleconference, March 17 th , 2015
IFRC	Linda Kelly, Manager, Strategic Partnerships and International Relations Department	Teleconference, March 24 th , 2015
	Peter J Glynn	Written Response, March 26 th , 2015
SPREP	Simon Wilson, Monitoring and Evaluation Advisor	Written Response, March 6 th , 2015
ANII	Beatriz Prandi	Teleconference, March 5 th , 2015
OSS	Khatim Kherraz, Executive Secretary, OSS	Written Response, April 8 th , 2015

Other Organizations		
Adaptation Fund	Dima Reda	Interview, December 23 rd , 2014
GCF	Stephanie Kwan	Interview, January 13 th , 2015

Former GEF Staff		
UNCCD	Monique Barbut	Interview, March 30 th , 2015
Independent Consultant	Kenneth King, Ex Deputy CEO of the GEF	Interview, February 5 th , 2015

ANNEX 2: COUNCIL SUB-COMMITTEE AND TASK FORCE DISCUSSIONS

The Council Sub-committee

1. The Council-Sub-committee was established in the June/July 2010 Council meeting. The seven member Council Sub-committee was chaired by the GEF CEO and remaining six members of the Sub-committee included Germany, Norway and United States, representing the non-recipient countries; and, Brazil, Indonesia and South Africa, representing the recipient countries. After the Sub-committee was constituted it led the process of development of the eligibility criteria. The meetings of Sub-committee were facilitated by the Secretariat. In several of these meetings the members from the task force, the Trustee, and the World Bank legal advisor for GEF, were also present. The GEF Secretariat started consulting with the Sub-committee members once the Sub-committee had been established. During the September 2010 to April 2011 period, the Council Sub-committee met at least five times to discuss various options on eligibility criteria for the potential partners. For four of these meetings, the minutes on the discussion and decisions made during the meeting are available and these provide rich insights into the evolution of the GEF approach to accreditation.

2. The analysis and policy options presented in the Grant Thornton report, and the paper on Broadening the GEF Partnership (GEF/C.38/8), were the reference points for earlier discussions in the Sub-committee meeting. The Secretariat continued to consult with the Council-Sub-committee members in periods between these meetings and the comments received from the Sub-committee through this process helped the Secretariat in refining the Council papers that were under preparation.

3. The minutes of the Sub-committee's first meeting show that the discussion covered topics such as: types of entities, engagement of bilateral agencies, assessment of strategic fit and value-added, role of accredited agencies in corporate activities, accreditation process and procedure, project performance criteria, arrangements for application of the GEF standards to projects, fiduciary standards, and, ESS. The main points discussed in the January 13th meeting of the Sub-committee were: the Sub-committee work program, constitution of the pilot, and the value-added review. The main points of discussion in the March 10th meeting were the pilot on accrediting GEF project agencies, the value-added review criteria, and draft policies on ESS and gender mainstreaming. The last meeting discussion for the April 14th meeting discussed: the pilot on accrediting GEF project agencies, value-added review, types of institutions, and application review procedure.

Task Force

4. After the 2010 June-July Council meeting, the Secretariat established a task force comprising of Zarafshan H. Khawaja, Peter Maertens, and, Joseph Wambia. The task force brought together expertise on social safeguards, internal audits, fraud investigations, post evaluation, and risk management. The task force reviewed the proposals that were under development. Given the foundational work done in the form of the Grant Thornton report and the June 2010 paper on broadening (GEF/C.38/8), the proposals that the Secretariat was working on – as per the task force – were fairly well developed. The task force met to discuss these proposals on Aug 26th 2010 and

offered several suggestions and recommendations that were incorporated in the eventual GEF approach.⁴⁹

5. The task force recommended that GEF's Minimum Fiduciary Standards, agreed by the GEF Council in 2007, should be incorporated in the related criteria on fiduciary standards without any changes other than modifications to frame corresponding questions to the applicants. The Task Force recommended that the accreditation process should be divided into three clear stages: i) Endorsement and Application, ii) Accreditation and Approval, and (3) Negotiation and Approval of the Financial Procedures Agreement and MoU. Another major recommendation was that the procedures should not require the Council's approval for accreditation as it will undermine the Accreditation Panel's independence along with the reputational risks. This recommendation was in contrast with the approach that was being followed in the Adaptation Fund, where the governing board gives the final approval. The Task Force also recommended that the assessment of strategic fit and value-added should occur prior to the evaluation of applications by the Accreditation Panel. Although after its first meeting, the Task Force did not meet again separately, its members participated in some of the Council Sub-committee meetings to provide the Sub-committee advice and clarifications on the Task Force's recommendations. Most of the major recommendations made by the task force were incorporated in the approach that was eventually approved by the GEF Council. One recommendation which was not incorporated was the possibility of conditional approvals, as the Task Force felt that a system of binary yes/no would result in a limited number of entities eligible for accreditation. However, to ensure full compliance with standards, the subcommittee did not favor this approach.⁵⁰

Cap on number of Project Agencies

6. During its first meeting, the Sub-committee discussed the concerns related to total number of new entities accredited and called for an overall cap so that the GEF partnership is manageable from the Operational Focal Point and corporate perspective. The GEF Secretariat suggested a cap of 10 agencies per year. The subsequent consultations carried out by the Secretariat on the topic showed that while there was unanimity that the expansion needed to be contained, there were differences on what the cap should be and whether it should be a firm cap or an indicative number. In the end, the number 10 per year was reduced to 10 agencies for the GEF-5 period (GEF/C.39/7/Rev.2), which was accepted by the Council in its November 2010 meeting.

Types of Project Agencies

7. The Secretariat sought opinions from the GEF OFPs and Council members on suitability of the national organizations, bilateral organizations, international organizations, and Non-Governmental Organizations for inclusion as accredited agencies. The responses from GEF OFPs and Council members indicated a broad consensus that international organizations and NGOs need to be included, and there was unanimity on inclusion of national agencies. However, there were sharp differences on inclusion of bilateral agencies. In subsequent discussions during the first meeting of the Council Sub-committee there was agreement that the expansion needs to be done in a graduated manner. However, there was no consensus on the overall cap for agencies, and specific caps for individual agency types. The GEF Secretariat's perspective was that it might be difficult to limit the number of national agencies and given the capacity constraints it might be feasible to

⁴⁹ Based on the report prepared by the GEF Expert Task Force on its Aug 26th 2010 meeting.

⁵⁰ Based on the report prepared by the GEF Expert Task Force on its Aug 26th 2010 meeting & the Sub-committee on its September 3rd meeting

accredit about 10 organizations per year. In the consultations between the first meeting of the Sub-committee and the Council meeting of November 2010, the issue seemed to have been addressed with the overall cap of 10 agencies within GEF-5.

8. During the first meeting in September 2010, the Council Sub-committee discussed the issue of fast tracking of the four UN agencies that had shown interest in getting accredited. The Sub-committee agreed that the accreditation process will be the same for all applicants. Thus, the approach of the Sub-committee on this topic was settled in the first meeting itself. During the third meeting of the Council Sub-committee in January 2013, the issue of accreditation was visited again. By this time a cap of 10 agencies had been agreed upon. During the Sub-committee meeting some of the members pointed out that five UN agencies were already part of the GEF partnership and that if UN agencies were also eligible for applying for the pilot they are likely to crowd out the qualified national agencies. The Secretariat suggested that to preempt such a possibility the Sub-committee could consider keeping the UN agencies out of the application process till five national agencies have been accredited. In the end consensus evolved around this suggestion and consequently the UN agencies were excluded from applying for the first round of applications for the pilot.

9. The Sub-committee discussed the approach to accreditation of regional entities in its first meeting. It agreed that the recipient countries should have a choice in agencies best suited for their needs. However, the Sub-committee felt that the number of regional entities that may deal with focal area specific topics might be limited. The Sub-committee also discussed the issue of limiting the geographical scope of the regional agencies to countries where they have a country presence. A proposal from the Secretariat called for limiting accreditation of regional entities to regions where UNDP or UNEP did not have a presence. The proposal was eventually discarded because the Sub-committee felt that such a restriction was not required.

10. The issue of inclusion of bilateral agencies was an intensively debated one both within the Council and the Council Sub-committee. In addition the Secretariat also consulted the Council members and Operational Focal Points. Paragraph 28 of the GEF instrument was open to participation of bilateral agencies in the GEF partnership. Further, there was already a precedent in Montreal Protocol for the inclusion of bilateral agencies as implementing agencies. The reservations against inclusion of bilateral agencies included: conflict with the spirit of multilateralism; political branding; risks related to stability of engagement; conflicts of interest in the Council; and, risk of undue political influence on the Secretariat and recipient countries. The paper on “Key Policy Issues” discussed during the November 2010 Council meeting presented inclusion of bilateral agencies in the partnership as one of the options. Nonetheless, it put two major constraints – no agency fees and access of only up to 10 percent of the host government’s contribution to GEF. The Council did not take any decision on this issue in the meeting. However, in the next meeting in May 2011, the Council decided that “While bilateral agencies will not be eligible for accreditation at this time, their participation in the pilot phase will be considered at the first meeting of the Council in 2013.” The issue was brought before the Council in its June 2013 meeting, the Council decided “to consider the possibility of a second round of accreditation, including accreditation of bilateral agencies, only once all Stage II reviews are completed.”⁵¹ The deliberations in the GCF Board also reveal similar concerns being discussed on accreditation of bilateral agencies. Although, in October 2014 the GCF Board allowed all types of organizations to apply, it requested its Secretariat to prepare a document on additional guidelines with regard to non-multilateral international entities

⁵¹ Joint Summary of Chairs – GEF Council Meeting. June 2011. Decision on Agenda Item 9 - Report on the Pilot Accreditation of GEF Project Agencies

(including international NGOs and bilateral organizations), in particular on their role with respect to the GCF's objectives and modalities, and following a country-driven approach.⁵²

11. A major issue that was not clarified during the Council Sub-committee meeting was the legal status of the entities eligible for application. The eventual approach made the language for the eligibility for becoming a GEF Project Agency broad enough to also allow non-legal entities to apply.

Country Ownership

12. "Policy Recommendations for the Fifth Replenishment of the GEF Trust Fund" (GEF/R.5/32/CRP.1) had explicitly noted that a necessary but not sufficient precondition for an applicant entity to be accepted in the GEF partnership is that its proposal is endorsed by the Country's GEF focal point. The Sub-committee revisited this topic from the perspective of ensuring country ownership. The Sub-committee agreed that new agencies will come in if a country requests to the GEF that they want to work with that agency.

Comparative Advantage

13. The Sub-committee agreed that the applicants should be able to show that they have already worked on GEF relevant subjects. The Sub-committee asked that in the paper (GEF/C.39/7/Rev.2) being prepared for the November 2010 Council meeting the concept of comparative advantage needs to be defined further. It also asked for it being made clear in the paper that GEF finances only the incremental costs and the Agencies need to demonstrate capacity to support the baseline costs.

Accreditation Costs

14. The Grant Thornton report had estimated that the cost of accreditation would be US 25,000 per review based on an assumption that the review would be conducted by a four member panel and will involve seven days of work for the panel. The report also estimated that in case additional reviews and a field visit are required, an additional cost of up to US \$ 75,000, may be incurred. It also projected that one additional staff person at the assistant level might be required to provide support for accreditation.

15. The Secretariat used the projections provided in the Grant Thornton report to develop the GEF approach to accreditation fees. While no fees were required for the review of Stage 1 application, for the Stage 2 application an upfront payment of US \$ 25,000 was required for the first desk review. Thereafter, the applicants were expected to make additional payments for additional reviews and field visits on a case by case basis. Compared to the rather modest estimate in the Grant Thornton report, the Secretariat put more staff (two) and at a higher level to facilitate the accreditation process. The study noted that there would be "incremental start-up costs and recurring annual costs," incurred by the GEF, as well as costs in managing the accreditation of new entities, but that these costs could be offset by a lower agency fee of 9 percent for the Project Agencies.⁵³

16. The Council Sub-committee discussions seem to suggest, although there was a desire to keep the accreditation process cost neutral to the GEF, there was also awareness that the actual costs

⁵² Decisions of the Board –Eighth Meeting of the Board, 14-17 October 2014; Decision on Agenda Item 6. GCF December 2014. GCF/B.08/45.

⁵³ GEF/C.38/In.10 June 28th, 2010, Broadening GEF Executing Entities: Assessment of Cost Benefits Analysis and Risk-Based Evaluation and Accreditation of New GEF Executing Entities

of accreditation to the applicant agencies may higher (in US \$ 100,000 to US \$ 300,000 range) and it may be a barrier to national agencies applying for GEF accreditation⁵⁴. Even the discussion of cost neutrality was limited to the costs of the Accreditation Panel in conducting its work. Recovery of other costs in terms of GEF Secretariat staff support and the Panel for value-added review were not discussed.

⁵⁴ Draft of the Minutes of the first meeting of the Council Sub-committee. September 3rd 2010. The final version of the minutes streamlines the relevant information.

ANNEX 3: INTERVIEW PROTOCOLS

3.1 Project Agency Protocol

Before deciding to apply

How did you come to know about the expansion GEF Accreditation partnership – what was the source of information?

What motivated your organization to seek accreditation?

What were the discussions that took place within your organization before submission of application for accreditation? What were the concerns that were discussed at that point?

Describe your interactions with relevant GEF Operational Focal Point at this point.

Application for the First Stage of Accreditation

What were the efforts made by the Secretariat to provide you relevant information to facilitate you in applying for the Stage 1 of the accreditation?

How much time and effort did it take to prepare the application for the Stage 1 submission?

To what extent did you have clarity on what was required from you to prepare an application that was compliant with the GEF requirements?

What were the challenges you faced in preparing your application for the value-added review by the Secretariat? How were these challenges addressed?

How many submissions (including revisions) were made to the GEF at this stage? Did the GEF Secretariat request additional documentation to support the stage 1 application – if so, on which topics was additional documentation requested and were the demands for additional documentation reasonable?

To what extent were the reviews undertaken by the GEF Secretariat transparent and fair?

Were there any parameters on which you did not agree with their assessments? Why?

What could have been improved by the GEF in the Stage 1 of the accreditation process?

Application for the Second Stage of Accreditation

What were the efforts made by the Secretariat to provide you relevant information for applying for the Stage 2 of the accreditation?

To what extent did you have clarity on what was required from you to prepare an application that was compliant with the requirements?

To what extent were the inputs received from the Stage 1 pre-screening for fiduciary standards useful?

How much time and effort – including effort on revisions and preparing requested supported documentation – did it take to prepare the Stage 2 application?

How much fees was charged upfront for the Stage 2 of accreditation? Were additional fees charged? If so how much?

What were the challenges you faced in preparing your application for the Stage 2 review by the Accreditation Panel? How were these challenges addressed?

How many submissions (including revisions) were made during the Stage 2 of accreditation? Did the Accreditation Panel/GEF Secretariat request additional documentation to support the Stage 2 application – if so, on which topics was additional documentation requested and were the demands for additional documentation reasonable?

Was a field visit undertaken during Stage 2? If yes, which issues did the Panel cover during the field visit? Were the costs charged for field visit reasonable?

To what extent were the reviews undertaken by the Accreditation Panel transparent and fair?

Were there any parameters on which you did not agree with their assessments? Why?

To what extent was the GEF Secretariat responsive to your needs at this stage? How were the communications between you and the Panel managed?

Where there any interactions with other applicants and GEF agencies at this stage? Briefly describe?

What could have been improved in the GEF accreditation process for the Stage 2?

Stage 3 of Accreditation

What was your experience with the third stage of the Accreditation Process including negotiations with the GEF on signing the financial agreement (with the Trustee) and the MoU (with the legal counsel of the GEF)? Time taken? Exchanges during this period?

Post Accreditation Experience

After accreditation (and in case applicable after Stage 2 accreditation), what steps has the GEF Secretariat taken to familiarize you with the GEF programs, business processes and procedures? Have these been useful? Have these been sufficient?

What has been your experience in developing GEF projects? Could you provide your feedback on the advice and guidance that you have received from the GEF Secretariat on project preparation? Interactions with the GEF Secretariat on upstream consultations on project ideas and PIF reviews?

Describe your experience in interaction the Operational Focal Points on project ideas?

To what extent do you now have clarity on your role as implementing agency? What are the areas where you feel you would like to have more clarity? How could the GEF Secretariat help in the process?

Generic questions

What to your mind is the added value that GEF gets with you as a Project Agency?

Are there specific areas within GEF strategies where you would be able to make significant contributions?

How are the GEF projects being prepared or prepared by you any different for the usual projects that you prepare? Is partnership with GEF bringing added value to you?

What were the total costs of the accreditation to your organization (including its break up)? Financial costs in terms of Fees paid to GEF; staff salary for those that were involved full time/part time in the accreditation; travel and documentation related expenses?

Overall, in your opinion to what extent was this process transparent and fair? What were the critical elements and what was redundant or less important? What could have been improved in the process?

How easy do you find to get the relevant information from the GEF website and other sources? Any areas where there are major information gaps?

What benefits do you perceive are accruing to your organization as a result of GEF accreditation? What benefits that are not yet evident, do you anticipate in future?

3.2 Operational Focal Point Protocol

Have your choices for implementing agencies increased?

What made them choose the given Project Agency for the given national project? To what extent was the choice based on the given Project Agency coming up with a concrete proposal for support?

In terms of capacities, in what ways are the new Project Agencies different from the GEF Agencies?

How do you see the role of the Project agencies in the further evolution of your GEF Country Portfolio?

For countries that proposed a national institution

What has been your countries experience with the GEF accreditation process?

What are the areas where the accreditation process has been as per your expectations?

What are the areas where the accreditation process has been poorer than your expectations? What have been the issues that have been of concern to you?

How could the GEF accreditation process be improved?

3.3 Project Reviewer Protocol

Keeping in view the suitability for GEF activities, what in your opinion are the similarities and differences between the GEF Project Agencies (the new agencies under the broadening pilot) and the GEF Agencies (the 10 multilateral agencies that were known as implementing agencies)?

In what areas do you expect the present set of new agencies (WWF-US, CI, IUCN, DBSA, FUNBIO) to be stronger? In what areas would they be weaker?

Compared to the reviews that you undertake for the proposals that the GEF Agencies submit, in what ways are the proposals submitted by the Project Agencies were different?

Discuss areas where the reviewed proposals were stronger, similar, or weaker?

Do you feel that the increasing reliance on Project Agencies poses a reputational risk to the GEF?

What efforts are required and might be useful to facilitate the new agencies in preparing proposals that are appropriate and compliant with the GEF requirements?

3.4 Accreditation Panel Protocol

To what extent were the efforts made by the Secretariat to brief you on your mandate and on GEF objectives? How were communications with the Secretariat, and with agencies managed?

How much of your time did the desk review for an individual agency take? Altogether, including field work, how much time did you spend per agency?

To what extent were the criteria chosen for assessing compliance with fiduciary standards, environmental and social safeguards, and gender policy, appropriate?

Given the nature of work for the second stage of accreditation to what extent have the time and other resources provided to you appropriate and sufficient?

How did the Panel function in terms of its interactions with other members? What were the topics where there were differences in opinion of the members? How were these differences resolved?

What were the experiences with the field verification exercises? What were the difficulties that you faced?

In your interactions with the applicants which concerns were easy to address? Which concerns were difficult to address?

To what extent were the applications prepared by the agencies for the Stage 2 of accreditation ‘well prepared’? What were the areas where the applications tended to be stronger – what were the weak areas? To what extent do you think Secretariat could have done more to prepare the agencies so that they had a clear idea of what was required?

To what extent were the agencies responsive to your request for information?

As a Panel member, in the hind sight what would you do differently to ensure that the smoother functioning of the Panel in terms of interactions with the other members of the Panel; with the Secretariat; and, with the GEF agencies? What would your advice be to the future Panel members?

In expansion of the GEF partnership, in your opinion what value has been added by the Stage 2 reviews? Were there any procedures or steps which seemed unnecessary during stage 2?

What changes do you think GEF should make to the Stage 2 of the accreditation process to improve it further? What changes should GEF make to improve its overall approach to broadening of the GEF partnership?

3.5 Value-added Panel Review

How much time did an individual review take?

How many iterations of review were required before you finalized your ratings (iterations may be required because of incomplete documentation, or lack of clarity in responses provided in the earlier versions of the application)?

For agencies whose documentation was not complete or where additional clarifications were needed, how did you proceed further?

Did you have access to reviews done by other panel members?

How much interaction was there between you and other panel members?

On which of the questions/standards in the review protocol it was easy to assess the performance of the agencies?

On which of the questions/standards in the review protocol it was difficult to assess the performance of the agencies?

Were there questions in the review protocol that were not very clear? Which were these.

In your opinion, to what extent were questions and standards specified for the first stage review appropriate? To what extent did the responses provided to the questions/standards provide a good measure of the likely value that the applicant agency would add to GEF operations?

What are the areas where the review approach for stage 1 could have been improved?