

Audit Trail: Assessing Inclusion of Marginalized Groups in GEF-Supported Projects, with Attention to Fragile and Conflict-Affected Situations (5/31/24)

Responding to comments received during the Reference Group meeting (4/25/24) and in written form from the GEF Secretariat (5/14/24).

Topic	Subtopic	Comment	Response/Actions taken
Scope: Focus on identified 'marginalized group'	Questions addressing sexual orientation and gender identity (SOGI)	CI: The Approach Paper currently reflects a binary understanding of gender. It is important to address SOGI persons, particularly in conflict-affected situations where they are impacted differently. However, one has to be sensitive to the fact that identifying these groups may put them at risk. The project team ought to explore what it means when SOGI persons are excluded from a project and to develop recommendations for how the GEF can approach addressing SOGI. UNEG: Consider literature on the economic cost of exclusion of SOGI people from the labor markets (see articles put out by Lee Batchet, UN, UNDP, and World Bank). Also see the GEF council meetings' discussion on SOGI inclusion. Note that the cost of exclusion is higher in FCV contexts. Also suggested discussing SOGI inclusion in the context of sustainable livelihoods.	After consultations with the World Bank's SOGI (sexual orientation and gender identify) advisor, adjustments have been made to the approach paper to include consideration of sexual and gender minorities. Data collection instruments will be vetted with the World Bank's SOGI team to ensure adherence to current strategy, terminology and good practice approaches. The literature referenced by the reference group will be reflected in the evaluation report.
	Questions regarding consideration of other marginalized groups	UNDP: Displaced populations can have big consequences for nations. Consider that the number of IDP is higher than the number of people displaced across borders. The "Formative evaluation of the integration by UNDP of the principles of leaving no one behind" 2022 evaluation recommended a marker	Language in the Approach Paper has been added to reflect additional consideration of references to other marginalized groups, including displaced persons. The evaluation team will be attentive to issues of intersectionality and report on them in the evaluation report.

		for inclusion based on a cross-cutting intersectional definition of social inclusion. This could replace asking specifically about persons with disabilities. It is possible there might be a new declaration similar to the UNDRIP on Afro descendant populations. When assessing projects in Latin America, consider the inclusion of Afro descendant populations, who tend to overlap with biodiversity hotspots. See the Rights and Resources Initiative global map overlaying biodiversity areas and Afro descendant territories. GEF Secretariat: Highlighted the importance of including persons with disabilities. FECO: There is no standalone comprehensive GEF policy that addresses persons with disabilities.	The Approach Paper addresses persons with disabilities, and the project team anticipates looking at the extent and nature of inclusion of persons with disabilities. The evaluation will also cover an analysis of the extent to which the GEF policies address persons with disabilities.
Attention to fragile and conflict-affected (FCS) situations	Question considering capacity building in FCS	GEF Secretariat: Capacity building is needed within FCS. People within the GEF Secretariat are concerned about how to improve working in FCS places for GEF agency staff. Consider how to tailor capacity building to fragile and conflict-affected situations.	Noted. The project team will keep this consideration in mind when conducting the evaluation.
	Scope of the evaluation	GEF Secretariat: Keep in mind the GEF’s mission to deliver global environmental benefits. The evaluation team should understand what is doable within the applications of our limited resources and application of our limited goals.	The project team recognizes that there are many practical limitations associated with GEF programming in FCS. As outlined in the Approach Paper, the evaluation will examine—through quantitative and qualitative analyses—how inclusion of marginalized populations affects the ability of GEF projects to deliver their objective of

			advancing GEBs, particularly in FCS situations. The evaluation aims to provide practical findings as well as feasible, implementable recommendations for how to better achieve GEBs through inclusion of marginalized populations.
Terminology and Definitions	Comments regarding IPLC terminology	GEF Secretariat: The GEF follows the CBD definition of IPLCs; it does not have a “preference.” It is not that the GEF “prefers” one term over another, but this is the current terminology used by CBD, so we follow the guidance received from the conventions. Correct description of IPLC terminology to note recent IPBES addition of local communities. Additionally, revise the description given that in places where IPs are not recognized by the government or that term may not be one that is accepted by the government or by the peoples themselves, it is still important that those peoples who, based on their specific characteristics, should receive the rights of Indigenous Peoples. Terminology regarding Indigenous peoples is a topic to treat with a lot of care, and there are ongoing discussions on the subject, specifically in various fora. It is not the GEF’s role to take a position on terminology but rather to ensure that safeguards protect rights (note the safeguards are specific to Indigenous Peoples) and then to do good through our projects as outlined in our Principles and Guidelines for Engagement with Indigenous Peoples.	Approach Paper has been adjusted to reflect this comment.

		Finally, please note that “local communities” is not capitalized. Current international discussions on the terminology may push other changes, but for the time being, at least, capitalizing Indigenous Peoples and not local communities is a simple way to denote their different statuses. In addition, please note that it is “Indigenous Peoples”, (plural) rather than Indigenous People and therefore, it should be IPLCs’, rather than IPLC’s.	
	Concern about the conflation of Indigenous Peoples and Local Communities	UNDP: As discussed at the UN Permanent Forum, there is a concern that the collective rights of indigenous peoples are being diminished by being conflated with other local communities. In some cases, this conflation may diminish both IP and LC rights. Agencies will probably need to be more careful to distinguish these groups. CI: Consider recommendations for how GEF can address the emerging issues regarding IPLC terminology in future projects.	Clarifying language has been added to the approach paper acknowledging the challenges to the IPLC taxonomy and associated issues and reflecting comments received from GEFSEC. The evaluation will test the sensitivity of definitions related to IPLCs, assessing the impact on project results.
	Concern about description of local communities	GEF Secretariat: In Article 8j of the convention, the CBD does provide some additional clarification of the term local communities with the words embodying traditional lifestyles (“local communities embodying traditional lifestyles”. More recently, IPBES has also provided a more specific definition of local communities. The last phrase is incorrect in the GEF context. In places where IPs are not recognized	See footnote 23. The project team is using the term “IPLCs” because “IPLCs” is the current terminology used by the Convention on Biological Diversity (CBD), which the GEF follows. The Approach Paper also notes the criticism of the term IPLCs for conflating Indigenous Peoples, who have specific legally protected status and rights, with local communities who are not necessarily guaranteed those same rights.

		by the government or that term may not be one that is accepted by the government or by the peoples themselves, it is still important that those peoples who, based on their specific characteristics, should receive the rights of Indigenous Peoples. The intention is not to lump together groups. In this context, these peoples are the Indigenous Peoples of the place. There are, in some cases, minority groups, such as Afro-descendants, who are also granted specific rights by law.	
	Terminology for “Indigenous Peoples” flag	GEF Secretariat: If this is about the check box on PIFs, then it is IPLCs.	Recognizing that the check box on the PIF may be for “IPLCs,” the actual terminology of the flag is “Indigenous Peoples.” The evaluation team plans to further consult regarding how best to reconcile.
	Concern about references to women as a homogenous group	GEF Secretariat: It is important to specify that women are not a homogenous group (and have different vulnerabilities). This is especially important in the context of FCS. Also consider this in sampling for case studies.	Additional text has been added to the Approach Paper recognizing the diversity and heterogeneity within the marginalized groups of focus. The project team will be mindful of this when selecting projects for site visits.
	Reminder to consider the diversity of definitions of “youth”	CI and UNEG: “Youth” is defined differently by different countries and contexts. GEF Secretariat: In the context of the GEF, the age group for the youth is wider - i.e., to 35 years old.	Noted and agreed. The project team has noted and will apply the definition of youth as individuals up to 35 years old in this evaluation.
	Comment regarding definition of persons with disabilities	GEF Secretariat: Please ensure that the definition of persons with disabilities encompasses different physical disabilities (including the blind, deaf, and mute).	The Approach Paper has been amended to include a revised definition of persons with disabilities to highlight its inclusion of different physical disabilities.

	Comment and question regarding gender diversity and framing	CI: Evaluation currently presents gender as a binary, which omits non-binary persons. UNEG: The evaluation matrix references gender in some places and women vs. men in other places. Is this difference in terminology intentional?	The project team will adjust the framing in the Approach Paper to include SOGI issues and reference gender and sexual minorities. No changes made on terminology in the evaluation matrix, as the terminology used mirrors that in the policies.
	Suggestion to define “IPLC lands”	GEF Secretariat: It is unclear how the evaluation will define “IPLCs lands” and “IPLC managed lands”. It may be helpful to identify different indicators for this question.	Noted. The Approach Paper has been amended to include more details on data sources.
Discussion and interpretation of policies	Suggestion to expand discussion of frameworks related to youth	GEF Secretariat: It is important to note that the MEAs’ “engagement” with the youth is rather substantive; they recognize youth as a “Constituency” or Major Group with voice and representation in their processes. In the CBD, the Major Groups can provide suggestions in decisions and outcome documents that, when supported by a Party, become part of the negotiations. As “youth” is not widely integrated within the Agencies, MEAs, or other funds policy, it would be helpful if the analysis could encompass the frameworks that are already developed, such as, IUCN Youth Strategy, CIF Youth Engagement, IADB Outreach program, and others. As Youth is not widely integrated within the Agencies, MEAs, or other funds policy, it would be helpful if the analysis could encompass the frameworks that are already developed, such as, IUCN Youth Strategy, CIF Youth Engagement, IADB Outreach program, and others.	The Approach Paper has been revised to include additional content and references.

	Comments on interpretation of FPIC	GEF Secretariat: All the Agencies, besides ADB, require obtaining FPIC if the project has significant impacts on Indigenous Peoples. ADB has almost finalized its revised safeguard policy, including FPIC. In the meantime, ADB has separate guidance to meet GEF minimum standards of ESS policy. Please refer to the latest progress report on GEF Agencies' compliance with GEF Minimum standards here. Sub-question 1.6 and related indicators 1.6.1 and 1.6.2 may be misleading since MS5 requires FPIC only for a project or program that may cause (a) impacts on land and natural resources, (b) relocation of Indigenous Peoples, and (c) significant impact on an Indigenous People's Cultural Heritage. Please consider clarifying accordingly.	Noted. Clarified in the Approach Paper. The new updated text that distinguishes between rights versus requirements.
	Correction to interpretation of Social and Environmental Safeguards	GEF Secretariat: The GEF's Minimum Standards for Social and Environmental Safeguards #5 is specifically for Indigenous Peoples and not for IPLCs.	The Approach Paper has been adjusted: references to the application of Minimum Standards for Social and Environmental Safeguards #5 reflect that it applies specifically to Indigenous Peoples.
	Suggestion to compare climate fund policies on IPLCs	GEF Secretariat: It would be helpful and interesting to analyze the related policies on Indigenous Peoples of sister climate funds, including GCF, CIF, and Adaptation Fund. This is also relevant in the context of ongoing discussions on harmonization of the Funds' discussions.	Noted.
	Suggestion to note UNFCCC's Disability Caucus	GEF Secretariat: Note that the UNFCCC has a Disability Caucus, which was represented in the last COP, COP28.	The Approach Paper has been amended to reflect this point.
Accounting for change in policies over time when	Recommendation to clarify for which GEF-funded	GEF Secretariat: It is important to note that the GEF's Policy on Environmental and Social Safeguards (2018) (page 11, para 4)	Noted and agreed. Clarified in Approach Paper.

assessing project compliance	projects new GEF policies apply	applied to GEF projects and programs submitted on or after July 1, 2019. Thus, the Policy on Environmental and Social Safeguards (2018) including MS1, MS5 (including FPIC), and MS8 did NOT apply to all the projects in GEF 5-6 and many projects in GEF-7. However, the evaluation matrix includes some ESS policies (MS1, MS5, and MS8) as inclusion indicators. These are not requirements for all GEF-5-6 projects and programs and many projects and programs in GEF-7. Responses to Questions 1 and 2 (and the subsequent analysis) should take into account the GEF replenishment cycles. For cycles prior to GEF-7, where gender mainstreaming was not a requirement as such, it is expected to find “scant” or “weak” reflections of gender perspectives in projects – both in the design and in reports. This is also a finding of our reviews done for the Progress Report on Gender. GEF has submitted such progress reports to the council since the adoption of the Gender Equality Policy and Gender Equality Implementation Strategy (2018). It will be important to keep in mind the start dates for policies when considering case studies.	
	Recommendation to clarify that it is too soon to capture trends based on the most recent GEF	GEF Secretariat: GEF's Gender Equality Policy (2018), GEF's Guidance on Gender, and GEF Gender Implementation Strategy are all important instruments that are making a huge difference in advancing gender equality in GEF	Noted and addressed.

	gender equality instruments	projects. However, as the projects and programs that are covered by these instruments are just being implemented, the findings of this paper will not capture the positive trends in gender equality in projects that are just approved. We suggest noting this caveat in the evaluation.	
Theoretical Framework and Evaluation Design	Overarching comment to consider exclusion by design in the analysis	GEF Secretariat: It is important to recognize that there may be some gaps in projects, which can result in a reluctance to engage with groups that would require specific plans or other additional steps. For example, a project team may choose to avoid areas with Indigenous Peoples to not trigger the FPIC requirement. We do not always know what is missing, and it is important to make this caveat and incorporate such reasons in the analysis.	Noted and agreed. The case studies and interviews will examine this in more detail.
	Suggestion to develop a theoretical framework on expected modalities for inclusion	GEF Secretariat: While the review of a sample of projects will certainly be helpful, for richer results, it might be useful to propose a list of policies and items in which the stakeholder groups should be included. The question would then not be on the presence of the stakeholder groups, but rather on “how” these stakeholder groups were involved and empowered. We suggest referring to the GEF’s modalities of stakeholder engagement, the gender action plan, the Core Indicator 11 with disaggregated data between males and females, and eventually, the socio-economic benefits.	Noted. This will be reflected in the portfolio review, country case studies, and evaluation. The evaluation will look at how stakeholder groups were involved and empowered in projects.
	Question regarding social inclusion assessment tool	GEF Secretariat: It is unclear how the evaluation will define levels of inclusion in projects. It will be helpful to know if there is any method to compare levels of inclusion in different contexts of the projects.	A footnote referencing plans to adapt the World Bank’s Social Inclusion Assessment Tool has been added to the Approach Paper. Methodology for assessing inclusion will be specified in the final evaluation report.

	Suggestion to include budget and hiring-related inquiries in gender portfolio review tool	GEF Secretariat: Due to the GEFSEC's due diligence on the compliance aspect, in particular, with respect to gender analysis and gender action plan, it will be (or is expected to be) 100%. The GEF review team will and often returns the project to the Agency if these required sections/parts of the project document are not included at the level of design. In addition, for the projects that meet these requirements, it might be helpful to analyze how many of the projects have budgeted Gender Action Plans (FCS / non-FCS) and the budgeted amount. Finally, please ensure that the composition of teams will be reviewed not only in terms of gender balance – women/men, but also in the presence of gender expertise.	Noted. The portfolio review will gather data on budget allocations for Gender Action Plans and the gender balance of the project team.
	Suggestion to look at the nexus of women, food-insecurity, and FCS	GEF Secretariat: It is important to acknowledge that conflict often destroys agricultural lands, disrupts food markets, and/or increases food prices. This may disproportionately impact women, who are the producers of 60-80% of food in developing countries, interfering with their income-generating activity and leaving them more vulnerable to food insecurity. Women are particularly affected because they are expected to provide food for their families and children, as the primary caregiver. We suggest adding these nuances to the paragraph and the evaluation.	The project team has updated the literature review to reflect these points. Extensive literature review moved to Annex, per feedback on the Approach Paper by external reviewers. The project team will consider how best to reflect this nuance in the evaluation based on what we find in our research.
	Suggestion to consider youth in the context of training and empowerment	GEF Secretariat: Please also consider highlighting the importance of engaging youth in training and empowerment programs. As they are in a period of transition to adulthood. They are the population that will become future professionals in various sectors and, thus, need	Text about youth training and empowerment programs has been added to the Approach Paper. The team will also be alert to rhetoric around youth training and empowerment in the portfolio review.

		support and mentoring. Youth engagement is not only about giving space in the decision-making processes, but it is also crucial to support them in educational (and other) aspects of their future. There is a need to integrate them more systematically in the various processes, considering the different realities and needs (as youth is not a homogenous group), and give them a space to be heard, to learn, and to grow.	
	Suggestion to clarify method of GIS analysis	GEF Secretariat: It is unclear how the evaluation can identify “IPLC lands” through GIS data. It will be helpful to clarify this and/or identify other indicators to gather this information accurately.	The mention of GIS analysis has been removed from the Approach Paper pending review of the data and feasibility of the analysis.
	Suggestion to skip analysis of dropped projects	GEF Secretariat: While the reviewers could look at dropped projects, that is likely not a particularly helpful set. Dropped projects are pretty rare, and projects can be dropped for a variety of reasons that would be hard to know from the outside and may have little to do with the subject of the evaluation.	Noted. The review of dropped projects has already been completed.
	Correction to start date of GEF flags	GEF Secretariat: The “gender tags” on Gender-responsive measures, with sub-categories: resources, economic benefits, and participation in decision-making, were introduced only in GEF-7.	Suggested revisions have been made to the Approach Paper.
Other	Comment on assessing effectiveness of project-level mechanisms for inclusion	CI: The project-level grievance mechanism is sometimes not as inclusive as intended (e.g., in countries in which the term “grievances” is understood to presume litigation). Consider exploring the accessibility of project-level mechanisms to get feedback from stakeholders (particularly for	Noted. While conducting the evaluation, the project team will consider the inclusivity of grievance mechanisms and redress mechanisms for projects.

		filing grievances and redress mechanisms) and developing recommendations for addressing these gaps at project level.	
	Suggestion to expand literature review on women and fragility to account for resilience and land tenure	GEF Secretariat: In discussion of women and FCS in Approach Paper, recommendation to draw connections between inclusion of women and climate resilience. Also, the Approach Paper does not mention the issues women may face regarding land tenure: Women's limited voice in natural resource governance is also related to land tenure. In many countries, women tend not to be land owners, which reflects women's limited participation in natural resource governance.	Additional content added to Approach Paper.
	Suggestion regarding the reference group	GEF Secretariat: Please consider including the members of the GEF Gender Partnership in the reference group.	The GEF Gender Partnership is represented in the Reference Group.
	Suggestion to add references	GEF Secretariat: Please reference GEF-8 Programming Directions on social inclusion. Please refer to UN Security Council discussions on Women, Peace, and Security, including the UN SC resolution on Women and Climate Change. Please also reference the Beijing Declaration and Platform for Action (1995) It might also be helpful to refer to the IUCN's Report on the triple nexus of Gender Inequality, State Fragility, and Climate Vulnerability, which includes opportunities and recommendations in fragile states to address the triple nexus.	References added.

		There was a decision during the last Minamata COP on IPLCs. Please reference it.	
	Suggestion to fix typo	GEF Secretariat: These publications were published in 2012 (<u>NOT</u> 2021), before the new GEF policy on environmental and social safeguards (2018).	Noted. Approach Paper changed.
	Suggestion to add word	GEF Secretariat: Please also add “non-discrimination” in the final part of the sentence regarding the “shift the focus from vulnerability, risks, and needs to one that focuses on rights, agency, and empowerment.	Added to the Approach Paper.