

Audit Trail on the comments received from the GEF Secretariat on the draft report of the Evaluation of GEF Programs in Pacific Small Island
Developing States
15 November 2024

PARAGRAPH NUMBER	REFERENCE TEXT	COMMENTS	IEO RESPONSE AND ACTION TAKEN
General Comments		The evaluation uses a mixed-methods approach combining quantitative and qualitative data. While this approach is generally robust and comprehensive, there are areas for improvement: Limited Evaluative Evidence: The evaluation acknowledges the limitation of having complete data, as many projects are ongoing. This is particularly true for the ISLANDS program, where no terminal evaluations were available. Relying heavily on quality-at-entry analysis for ongoing projects may not fully capture implementation challenges and outcomes. Two of the three programs evaluated are completed and have undergone TEs. It seems inaccurate to compare results (reference to paragraph 128 on pg.53, on limited results obtained in waste management) and effectiveness for programs that are not at the same stage. Contribution Analysis: While the evaluation mentions using contribution analysis, it could be strengthened by a more explicit and detailed application of this framework. A more rigorous contribution analysis would help to isolate the effects of GEF interventions from other factors, providing a clearer picture of program effectiveness. This is particularly important in	The portfolio under review encompasses all programs in the Pacific SIDS from GEF-5 onward, totaling three programs. The majority of available terminal evaluations pertain to the R2R Program's results, as discussed in paragraph 128. Regarding waste management achievements, assessment is based on the ISLANDS program's expected target outcomes. According to Project Implementation Reports (PIRs), current project results fall significantly short of these targeted outcomes. While the contribution analysis was previously incorporated into the findings section, we have now added a dedicated paragraph.

		understanding the capacity gaps in the Pacific from a human resource standpoint and the inability to source suitable staff. Given the geographic remoteness of the Pacific SIDS some of the observed issues identified in the review could be due to the lack of regional entities with specialized skills to support the substantive and project management needs of the GEF programs. Further, the limited project management costs included in GEF projects may be insufficient to source talent and should be looked at as a factor in the delays in identifying project staff. Case Study Selection: The selection of case studies, while ensuring representation from different GEF agencies and project stages, could be made more robust by using a clearer sampling framework. This would strengthen the generalizability of the case study findings to other Pacific SIDS. Specificity of Qualitative Data Collection: The evaluation mentions conducting key informant interviews but could benefit from specifying the number of interviews, the interview guides used, and the process of interviewee selection. This would provide greater transparency and rigor to the qualitative data collection process. There will always be an inherent time gap or delay when developing the internal coherence links between parent and child projects. The global projects often need time to establish program level indicators, strategies (stakeholder	The criteria for selecting case studies included multiple factors; additional details have been provided. The evaluation team has added an annex of all interviewees.
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		engagement, gender, finance) and mechanisms/relationships for reporting, monitoring, and evaluation. The 5-year program timespan, in the context of SIDS, limits “real” activity implementation when taking the afore mentioned process into account. SIDS should be considered as a special case for implementation to account for the systemic challenges they face.	
2	<i>The GEF made a strategic shift from individual projects to programmatic approaches for SIDS starting around 2008.</i>	This sentence and the use of the word ‘shift’ is misleading as it may suggest that the GEF discouraged or no longer supported individual projects in SIDS. Please amend. In addition, it is essential to note that this was not a “strategic shift” but rather a necessity to ensure that in GEF-5, PSIDS didn’t lose their STAR. Their STAR was hardly in programmatic approaches for GEF-6 or GEF-7.	The text has been amended to reflect that the GEF has continued to support individual projects in SIDS.
12	<i>While challenges to sustainability involve deficiencies in...insufficient capacity investment.</i>	Human resources are often incredibly limited in the SIDS, with small workforces and a significant issue of brain drain. There are limits to what a GEF project can be reasonably expected to accomplish, especially in this region, if there simply aren’t the people to train. It will be helpful to mention this caveat in this paragraph and in the evaluation in general.	While this evaluation focuses on GEF programs, it acknowledges throughout that these human resource constraints are systemic challenges affecting all development interventions in the Pacific region. Operating within its scope, the GEF must continue to address these challenges through both long-term strategies to help build sustainable human capacity and short-term measures to mitigate their immediate impacts on project implementation.
16		What about adaptation programs? One example is #3101. It is also worth noting how different R2R (integrated national projects) is from ISLANDS (focused regional project as part of a global program).	The evaluation scope considered programs from GEF-5 onward. Program GEF ID 3101 is from GEF-4.

13	<i>Only one SIDS country is participating which is a missed opportunity given SIDS' experience with regional, R2R, and whole-island approaches. One of the evaluation's recommendations calls for the GEF to ensure a greater diversity of countries included in integrated programs and to be more inclusive of smaller countries such as SIDS.</i>	This seems not to include GEF-8, where there is a SIDS-specific IP as well as SIDS participating in many IPs.	Section 2.2 provides background from previous GEF IEO evaluations of SIDS, including their key conclusions and recommendations. However, as these evaluations were conducted before GEF-8, insights from this current replenishment period are not reflected in this section.
23	<i>Additionally, the evaluation team conducted a scoping exercise to identify past projects in Pacific SIDS countries taking similar approaches.</i>	Please clarify how “similar” is defined and what was done in the projects that have similar approaches. To our understanding, the only similarities between R2R and ISLANDS are where they are and that they are programs.	The term “similar” in this context refers specifically to projects operating in Pacific SIDS that were reviewed solely to assess how their documented lessons were incorporated into the design of subsequent programs and child projects. We acknowledge that programs like R2R and ISLANDS have distinct objectives and approaches, and our review focused narrowly on how previous project experiences in the region informed newer project designs, rather than comparing program objectives or implementation approaches.

31	<i>While the number of projects and funding varied from year to year, certain periods stood out for exceptional activity. Notably, 2014 and 2015 were peak years for GEF engagement in the Pacific SIDS. A record 15 projects were approved in 2014, followed by 13 projects in both 2015 and 2004. From a financial standpoint, 2015 saw the highest allocation at \$62 million, with 2014 and 2022 closely following at \$59.5 million and \$58.2 million, respectively (figure 7).</i>	The main message of this paragraph is not clear. The value of the information on the specific years where SIDS investments are higher is unclear. It would be helpful to note the GEF phases these dates fall within. The GEF works on 4-year cycles with ebbs and flows during that time across the portfolio as a whole. The information presented in this paragraph can be misleading data for anyone outside of the GEF world, as GEF resources are not invested by calendar year. In addition, GEF projects typically last 4-6 years, so there are continued investments in the project. Please revise this paragraph and Figure 7 to accurately reflect the working modality of the GEF. Also, this para and Figure 7 do not specify what project milestone is being used – is it PIF/PFD approval? CEO Endorsement? Please clarify. In addition, please note that GEF Engagement is much more than funding investments.	The figure has been revised to display data by GEF replenishment phase and modified the accompanying text to reflect GEF SEC's feedback.
32	<i>Notably, there are significant disparities between countries in terms of the number of approved projects and allocated funding.</i>	A footnote to unpack this finding would be helpful. What are the assumptions in this analysis, and why? For example, PNG is the largest in terms of geographic and population distribution, so it makes sense that PNG would lead on most projects and funding.	In response to GEF Secretariat feedback, both the figure and accompanying analysis have been enhanced. A statistical correlation analysis was added to strengthen the analytical rigor and better address the Secretariat's comments regarding the relationship between population and funding patterns.

		It might be helpful to consider a relative metric to present the data, such as the average amount per project instead of the number of projects and the total amount invested. Countries choose the number of projects they have with their total STAR allocation. For example, some countries might do a couple of regional or a couple of MSPs or one big FSP per cycle. Countries also have different STAR allocations based on their different characteristics, and all “allocated funding” is through STAR. Also, please note that some countries haven’t submitted GEF-8 projects yet, but their money is available to them, and they will likely submit. Please caveat this in the study.	
Figure 7		Please consider displaying the project numbers in an alternate way (e.g., through dots). Some countries have not yet submitted their GEF-8 project(s), and, therefore, their numbers are lower, especially because GEF-8 STAR is double that of GEF-7 for many of these countries. Also, based on the characteristics of these countries (e.g., more biodiversity), they might receive more STAR allocation. Please consider and reflect these in the evaluation.	A note was added to clarify this situation.
33	<i>Evolution of GEF Support</i>	There is no mention of STAR allocation/utilization up to this point. An analysis of STAR, including within MFA projects, would be useful in this section.	A footnote was added regarding the STAR.
33	<i>The transition from multi-focal approaches...</i>	It seems that this should read multi-focal <u>area</u> approaches. Please revise accordingly.	Text was amended to “multifocal area approaches.”

34		It would be good to look at GEF-6, GEF-7, and GEF-8 to discuss a trend rather than focusing on GEF-4 and 5 only.	This section provides a descriptive analysis of GEF interventions by replenishment phase, rather than attempting to identify trends, as trend analysis is beyond its intended scope.
37	<i>In May 2008, the GEF Council formally approved the program support modality.</i>	This is more formally called the Programmatic Approach modality, not the Program Support modality. Please revise accordingly.	Noted. The text was revised accordingly. <i>"In May 2008, the GEF Council formally approved the programmatic approach modality."</i>
38	<i>but there are R2R projects in SIDS in other regions that are not part of this program.</i>	R2R is not a term specific to GEF and it does not have a strict definition, but rather a name for some projects that were doing integrated, landscape-scale work. However, some projects doing very similar activities didn't use this name. Therefore, the use of this term as a "data point" will not be able to capture all the relevant information on this topic.	Noted. The text was revised accordingly and the reference that did not capture all the R2R approach was removed.
41	<i>The R2R program is a GEF-5, UNDP implemented, multi-trust fund (GEF, LDCF) program...</i>	It is important to add that this was also a multi-focal area program.	Noted. The text was revised accordingly. <i>"The R2R program is a GEF-5, multitrust fund (GEF, LDCF), MFA program, ..."</i>
49 / Table 1		It is unclear why only a few Pacific SIDS are presented in this table showing national alignment with the GEF investments. For R2R, many additional PSIDS could be added to this table. If this is just meant to be an example of a few countries, it would be helpful to add this to the table title to avoid accidentally communicating that only these countries benefited from national policy alignment with GEF programmatic funding.	Thank you for this valuable feedback. We have revised the table's title to clearly indicate that these are selected examples that illustrate national alignment patterns, rather than an exhaustive compilation. The evaluation team retained this information to emphasize an important distinction: while convention reporting represents a mandatory compliance requirement, the integration of environmental priorities into national development strategies demonstrates political commitment and strategic prioritization at the country level.

		While there may not be mentions of chemicals in the national development strategies, it can be misleading to state that the projects are not aligned with national priorities. All countries have had to submit Stockholm convention NIPs and Minamata convention MIAs. The project is aligned with the national priorities stated in these conventions' enabling activities but also aims to assess the gaps in national legislation and strategy to integrate sound chemicals and waste management into national development strategies. Moreover, due to the common challenges faced by SIDS and the fact that all chemicals are imported and not produced in the region, priority is given to producing a regional strategy, which could then be applied and adapted to the national context. Please revise this section accordingly.	
Table 1	<i>This program identifies infrastructure deficits as one of the main challenges and acknowledges Vanuatu's vulnerability to natural disasters. While it extensively addresses infrastructure issues, <u>it does not sufficiently emphasize the need</u></i>	The assessment that the project in Vanuatu does not sufficiently emphasize resilient infrastructure does not seem accurate. The amended document was formulated in the aftermath of Cyclone Pam and discussed at length the need for resilient infrastructure. It includes sub-components such as: <i>reduced vulnerability of physical and natural assets; early warning systems; improved drainage; urban roads constructed and managed to deal with frequent floods; Efate ring road rebuilt in a climate-resilient manner; priority measures to help urban communities cope with floods; sub-catchment level action plans; climate-resilient urban road standards and guidelines; Port Vila disaster risk management plan; climate</i>	The analysis examined the alignment between GEF projects and priorities explicitly stated in national development plans. While the CPDP project in Vanuatu effectively addresses resilient infrastructure needs, these issues are not specifically highlighted in Vanuatu's Development Plan 2016-2030. The text has been revised to make this distinction clearer.

	<i>for resilient infrastructure.</i>	<i>resilient building codes and related regulatory support.</i>	
50	<i>The analysis presented in table 2 provides a comprehensive overview of each program's alignment with the most pressing five key challenges in these countries: climate change and sea level rise, biodiversity loss, waste management, water security, and food security (IPCC 2023).</i>	Given that some of these GEF Programs are now quite old (R2R was GEF-5), it seems misguided to compare them against a 2023 IPCC set of key environmental challenges, of which not all were necessarily identified as priorities. For example., later in this paragraph, the findings state that “Food security, while touched upon by R2R and CPDP, appears to have less dedicated focus across the programs”. It is entirely likely that food security was less of a concern in 2012/2013 when the R2R was being designed compared to 2023. It may, therefore, be useful instead to discuss the alignment with the key challenges that were identified at the time the programs were developed and discuss the continued relevance of the programs in relation to the challenges identified in the IPCC Report referenced. Please revise and caveat accordingly.	Noted. The paragraph and table have been removed.
Table 2		It is misleading to say that no interventions resulted in “limited” coverage. A more accurate reflection would be N/A for not applicable at the programs may not have had any focus on these issues by design, for the exact reasons noted in my comment above. Please revise accordingly.	Noted. The paragraph and table have been removed.
Table 2, CPDP alignment	<i>CPDP alignment across areas such as Waste Management, Biodiversity Loss is noted as “Limited”, with para 50 stating: “The</i>	This statement seems to indicate lack of clarity regarding the scope of the LDCF. The LDCF is a fund dedicated <u>exclusively</u> to climate change adaptation. It does not support global environmental issues that the GEF Trust Fund does, such as Waste Management or Biodiversity Loss. <u>CPDP is not a multi-trust fund, multi-focal area or integrated program</u> , so it would not be	Noted. The paragraph and table have been removed.

	<i>analysis also indicates that... there are challenges where coverage is more limited, suggesting potential areas for future consideration in environmental management strategies for Pacific SIDS."</i>	expected to address issues beyond climate change adaptation. It is a program focused exclusively on climate-resilient development, primarily resilient infrastructure.	
54	<i>While this project aimed to promote knowledge exchange and learning across regions and projects, progress has been slow due to issues with the initial program manager, highlighting a gap between design intentions and implementation.</i>	The change in the EA project manager for 10267 is the reason for the delay across all aspects of project implementation. Mentioning the delay in project implementation in relation to knowledge management and learning only could be misleading. Please revise this sentence for increased accuracy.	Noted. The text was revised accordingly.
54	<i>In the CDPD program, the child project (GEF ID 9512, ADB) was designed in response to a request from the</i>	The LDCF does not support a broad suite of environmental issues; that is the domain of the GEF Trust Fund. The LDCF only supports adaptation to climate change. The purpose of the Tuvalu project was to support climate-resilient transportation.	Climate change adaptation in Tuvalu encompasses multiple priority interventions as outlined in the country's National Adaptation Programme of Action (NAPA). Key activities include coastal protection through defense structures, channel breakers, and green belts, supported by local capacity building; enhancement of freshwater security through improved collection systems, protective

	<i>Government of Tuvalu to enhance its transportation development plans, demonstrating alignment with national priorities but also raising questions about the balance between government requests and broader environmental objectives.</i>		infrastructure, and community water conservation; agricultural resilience through salt-tolerant crop varieties and inter-island crop diversification; marine ecosystem conservation through community-based near-shore management programs; and sustainable natural resource management. The GEF adaptation programming strategies for the Least Developed Countries Fund (LDCF)/Special Climate Change Fund (SCCF) identify similar priority themes for high-impact interventions. Given this context, the evaluation highlights the importance of balancing specific sectoral needs, such as resilient transportation, with the broader adaptation priorities identified in both Tuvalu's NAPA and the LDCF strategy. The text was adjusted in line with the comments and the above information.
56	<i>Inconsistencies in indicator quality and M&E practices between programs and child projects highlight the need for a more coherent approach</i>	This is a very general statement for a series of GEF programs over several GEF phases, with more recent programs improving on the lessons learned in the older ones. This paragraph should be more precise about which of the three programs led to this conclusion and not just generalize across all three. If the case is true for all three programs, then this should equally be specifically stated.	Acknowledging the temporal evolution across programs is important. While this finding applies to all three programs, the text was revised to reflect the improvements observed in more recent programs, particularly ISLANDS.
57 & 58	<i>Regarding the R2R program, nothing is mentioned about the establishment of safeguards</i>	This early GEF-5 program was designed under different policies for safeguards and gender than the GEF-7 ISLANDS. It is incorrect to compare three programs to each other while ignoring the context from when they were developed. This	Our analysis focused on fundamental environmental and social (E&S) safeguard elements that have remained consistent across GEF policy iterations, rather than assessing compliance with current standards. This approach employed straightforward binomial criteria

	<i>Gender integration presents a mixed picture, with notable progress in some areas but room for improvement in others</i>	evaluation is, therefore, implying that the newer GEF programs better comply with current GEF policies compared with older programs where many of these issues were not yet GEF policy. It would be more accurate to evaluate the projects against the GEF policies when they were developed. Please revise accordingly or caveat this in the evaluation. This section seems to be conflating environmental and social safeguards and gender mainstreaming, which could be confusing to the reader. We would suggest separating the safeguards and gender mainstreaming, as it may be more useful to feature gender aspects independently of ESS.	(presence/absence) and magnitude assessments to evaluate core elements including basic establishment of E&S safeguards, presence of supervision mechanisms and implementation of risk management practices. While we recognize that the ISLANDS program reflects GEF's evolved and more comprehensive approach to safeguards, our evaluation centered on whether these basic elements were present in project design and implementation. Although specific policy requirements have evolved since GEF-5, both safeguards and gender considerations were required components even then. Therefore, the absence of these elements in project design represents a significant oversight that demands attention. We agree that separating the gender analysis from the E&S safeguards discussion will improve clarity and allow for more focused examination of each topic.
59	<i>On this regard, and even if it is out of the scope of the evaluation, it is worth highlighting that the GEF-8 Blue and Green Island Integrated Programme demonstrates significant advancements in gender mainstreaming and</i>	Two points to be considered in reference to this paragraph- i) reference to the progress the GEF partnership has made with programmatic approaches since the design of these early programs, such that many of the observations noted in this evaluation are already being improved upon; ii) If BGI IP is to be referenced in this light, then for consistency other notable examples where there have been improvements in addressing M&E, policy coherence etc should also be referenced.	While the Blue and Green Island Integrated Programme (GEF ID 11250) falls outside this evaluation's scope, its mention demonstrates recognition of GEF-8's continued evolution in integrated program design. This acknowledgment provides important context for understanding the trajectory of programmatic approaches in SIDS, even as it remains distinct from the evaluation's formal assessment.

	<i>monitoring for SIDS projects.</i>		
60	<i>... (GEF ID 5544, UNDP) developed indicators¹³ that support the program's objectives, but the number of indicators was limited, potentially constraining comprehensive assessment.</i>	Please clarify a comprehensive assessment of what. This claim seems to be subjective and lacks evidence. It will be helpful to clarify questions such as how many indicators are considered "limited" and relative to what? The amount of funding? The number of activities? The number of people?	The assessment of indicator limitations is based on both quantitative and qualitative analysis. While the child project in Marshall Islands (GEF ID 5544) had 8 indicators across its 3 outcomes and 12 outputs, the coverage and depth of measurement was not comprehensive enough to fully capture the scope of intended achievements. For outcome 2, which included four substantial outputs (secondary legislation for PAN Act, operationalization of PAN Office, strengthened community-based management structures, and capacity building across 24 outer islands), only two indicators were used: one tracking a single staff position (PAN Coordinator) and one counting trained professionals. These indicators, while relevant, measure lower-level results and do not capture critical higher-level changes like improved institutional coordination or strengthened management structures. The results matrix shows that while the project's logical framework was generally sound, the indicators did not fully reflect the breadth of planned activities and intended changes. For example, key aspects like the effectiveness of community-based management structures and the quality of capacity building programs across the 24 outer islands were not measured. Therefore, while acknowledging that the existing indicators are valid, we maintain that the limited number and scope of indicators relative to the project's comprehensive objectives and outputs constrained the ability to fully assess progress and impact.

63	<i>The GEF's regional approach has been particularly beneficial in attracting other donors to work in the Pacific SIDS, providing compatibility and facilitating easier intervention opportunities.</i>	It would be useful to report some co-financing statistics here.	The report has added a text on cofinancing using the most recent analysis made by the GEF IEO Evaluation of Cofinancing in the GEF.
65	<i>The GEF's regional approach in Pacific SIDS appears to contribute to policy coherence by facilitating knowledge sharing and promoting consistent approaches across countries, although it faces challenges due to the diverse needs and capacities of different SIDS. Programmatic approaches like Ridge to Reef (R2R) aim to promote consistency in policies across different sectors and</i>	As also noted in the approach paper to this evaluation, GEF's focus on policy coherence is a recent mandate that was not a priority when R2R was being designed. Therefore, it is misleading to report on this and fault a GEF5 program based on current GEF priorities. Please revise or caveat accordingly.	The text has been revised accordingly.

	<i>governance levels, but success varies, and cross-sectoral coordination remains a challenge.</i>		
Para 67	<i>However, the child project GEF ID 9512 has reported progress only in infrastructure outcomes, with no advancements in environmental outcomes.</i>	It is not clear why the draft evaluation consistently suggests that the LDCF program CPDP and its child projects should have achieved environmental outcomes such as waste management or biodiversity conservation (see Table 2). As indicated in earlier comments, the GEF Trust Fund supports global environmental issues; the LDCF does not, and CPDP is not a multi-focal area or integrated program. As an LDCF-supported project, ID 9512 is a climate change adaptation project focused on climate-resilient infrastructure.	The GEF IEO fully understands the objectives of the LDCF. The concern highlighted in the text, as well as in other sections of the report, is that the evidence collected from sources such as the Mid-Term Review (MTR), PIRs, and interviews indicates that project achievements have largely focused on traditional infrastructure outputs, rather than integrating specific climate-resilient components into these outcomes. The latest 2023 PIR states, “The GEF will finance a transit shed and a crane truck to improve the transfer operation and indirectly help expedite increasing climate resilience of the community infrastructure, which has been ongoing since 2015.” This indirect link to climate resilience lacks clarity in terms of current and future results. Given the concessional nature of LDCF funds, infrastructure investments should aim to maximize adaptation outcomes; however, in this project, it remains unclear how these outcomes are being meaningfully addressed. The text has been revised to replace “environmental benefits” with “adaptation benefits.”
70 and Table 3		This table can be clarified further. Is the middle column on the description of outcomes including text from project documents for the respective examples on the right? If so, the text in the middle column should also identify the source project. At the moment, the table seems to be	The text has been revised accordingly, the source of the evidence has been added.

		presenting planned outcomes from all R2R projects and then giving examples of where it worked or didn't work. This gives incomplete and misleading pictures. Please consider revising for increased clarity.	
71	<i>Despite some reported progress, 11 child projects (73 percent) reported unachieved or below-expected results in their terminal evaluations</i>	Please clarify if this sentence refers to one or more specific unachieved or below-expected results. Or if the entire project was unachieved/below-expected. While it may be true that many projects do not fully meet all their planned goals, it doesn't seem accurate to portray this as a failure. Please be more specific about which results (one or more results – or – the entire project).	The text does not suggest complete project failure but rather highlights specific unmet targets that are significant enough to warrant attention. The portfolio-level analysis helps identify patterns of underachievement across programs while acknowledging that projects may have achieved other results. Each example provides precise, measurable outcomes where projects fell short of their stated objectives, supporting the aggregate finding. The text has been revised maintaining the statistical finding at the aggregate level, while being more precise about the nature of underachievement on the specific examples. <i>“Terminal evaluations show that 11 child projects (73 percent) reported one or more unachieved or below-expected results in key outcome areas.”</i>
71	<i>This suggests that while the R2R approach has yielded positive outcomes, there are still significant areas for improvement</i>	Is this speaking to the R2R approach generally? Or does the R2R approach need significant improvements in other SIDS regions that have adopted it? Please clarify/amend text accordingly.	The text has been revised to focused on the assessed R2R Program in the Pacific SIDS. <i>“This suggests that while the R2R approach in the Pacific SIDS has yielded positive outcomes, there are still significant areas for improvement.”</i>
73	<i>The R2R program shows a robust approach to knowledge sharing...</i>	Some Pacific R2R KM approaches are missed. Please also consider the program's knowledge sharing and dissemination to other SIDS through the IW:LEARN platform and the SIDS-to-SIDS twinnings, i.e. between the Pacific R2R and Caribbean IWEco (https://www.pacific-	The text has been revised accordingly.

		r2r.org/sites/default/files/2020-07/twinning-gef-pacific-r2r-iweco.pdf)	
74	<i>The ISLANDS program in the Pacific region has struggled to meet its objectives, facing numerous implementation challenges. Initially, the program was thoughtfully designed through consultations with SPREP (Secretariat of the Pacific Regional Environment Programme) and other key stakeholders. It aimed to align with GEF's strategic directions and introduce innovations such as harmonized policies across the region and centralized waste treatment facilities. However, despite these well-intentioned plans, the program's</i>	While the ISLANDS program has faced implementation challenges and there are several critical issues that need to be addressed to improve its effectiveness, it is important to remember that it is still ongoing, with time remaining to achieve its targets. It is essential to note that all regional projects in the chemicals and waste space executed through SPREP have faced the same dissonance between expectations and the reality of project execution in the Pacific, regardless of the donor.	The current text serves an important evaluative function by identifying implementation challenges that need attention, even as the program continues. This transparency can help inform adaptive management for the remaining implementation period and provide lessons for future programming.

	<i>effectiveness in the Pacific has not lived up to expectations, with implementation proving more difficult than anticipated.</i>		
74	<i>This stands in contrast to some other regions, such as the Caribbean, where implementation appears to have progressed more smoothly. The Pacific region encountered several obstacles that hindered the program's success. These included delays due to COVID-19, changing priorities among participating countries, and a lack of regional cohesion. The original design quickly became outdated after the project's kickoff, leading to</i>	While the comparison between the Pacific and the Caribbean provides a useful benchmark, it's essential to acknowledge the significant contextual differences between these regions. The Pacific region presents unique challenges, including its vast size, the remoteness of many SIDS, and the diverse work cultures across multiple time zones. These factors can impact project implementation and should be considered when evaluating program effectiveness. The Caribbean, by comparison, when it comes to ISLANDS, has a mature, highly skilled regional center and team that is specifically set up to support chemicals and waste projects. The same center has previously supported several GEF regional projects in chemicals and waste, so they have built credibility and trust with the countries in the region. This arrangement is unique to the Caribbean and should be noted in the evaluation.	The current text maintains appropriate scope and focus while using the Caribbean reference as a brief contextual marker rather than a detailed comparison. A comprehensive analysis of the ISLANDS Program's performance in the Caribbean, including its institutional advantages and implementation specifics, will be addressed in the forthcoming GEF IEO evaluation of Caribbean SIDS interventions. This separate evaluation will provide the appropriate venue for a detailed examination of regional differences and their implications for program effectiveness.

	<i>difficulties in implementation. There were also challenges with project management by the executing agency (SPREP). Some participating countries expressed concerns about the level of attention given to the project, which led to some frustration and delays in implementation. Supervision reports indicated low expenditure rates and poor performance reviews for the Pacific component of the program.</i>		
75	<i>Despite these setbacks, the ISLANDS program achieved some focused small successes in specific areas. These included the implementation of</i>	Regarding the Programme Coordination Group (PCG), please clarify that this pertains to the global project (10266) and not the Pacific project (10267). The ongoing mid-term review of the global project is addressing the PCG's effectiveness, including the suggestion to establish a Project Steering Committee (PSC).	The text has been revised to reflect this comment.

	<i>localized strategies for chemical packaging in Papua New Guinea, a targeted mercury pollution awareness campaign, and small-scale youth engagement through initiatives like the Tide Turners challenge. However, the programmatic approach yielded mixed results overall. While it fostered some collaboration, stakeholders often found it overly rigid and sometimes ill-suited to the Pacific context.</i>	For the Pacific project, the PSC serves as the governance body, with annual meetings to review progress and make decisions. It's acknowledged that there were initial misunderstandings about the governance structure, but these have been addressed with guidance from the Implementing Agency.	
77	<i>The ISLANDS program presents a more complex picture of knowledge sharing, with variations in practices and effectiveness across different countries. In Tonga (GEF ID 10267), the project</i>	The evaluation's observation about the variations in knowledge-sharing practices and effectiveness across the ISLANDS program is well-taken. Efforts are already underway to ensure that all regional projects, including those in the Pacific, share their information on the gefislands.org website. This will help to centralize knowledge and make it more accessible to all stakeholders. It will be helpful to reference this in the evaluation.	The current text maintains appropriate evaluative rigor by focusing on documented evidence while using measured language that acknowledges the program's evolving nature without guessing about future improvements. The identification of current gaps and challenges serves an important function in informing adaptive management, even as new knowledge-sharing mechanisms are being developed.

	<i>faces challenges in utilizing regional knowledge sharing platforms effectively. The regional website is not frequently used, with the Department of Environment preferring to use its own website for information dissemination. While both online and in-person seminars are conducted for the program, along with national events, the project website's instability poses a challenge to consistent information sharing. A notable issue is the limited direct connection between countries participating in the program, which hampers the understanding and development of the</i>	The Pacific project (10267) is still in its early stages, and significant knowledge sharing may be more appropriate as the project progresses and generates more substantial results and lessons learned. Please caveat this in the evaluation. While the global program has facilitated knowledge sharing through side events at COPs, it is also crucial to note that these events were not optimally timed for participation from the Pacific region due to time zone differences. Consider recognizing that some exchange of experiences has occurred, such as the meeting on ELVs in May 2023, which included in-person participation from the Pacific. Webinars scheduled in Pacific time have also facilitated knowledge sharing. As the ISLANDS program progresses and regional projects yield more results, there will be increased opportunities for valuable knowledge sharing and peer learning across all regions. Consider noting this in the evaluation.	
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	<i>regional component. In Vanuatu, the ISLANDS program's knowledge sharing appears to be more centralized but somewhat limited in scope. Information is primarily received through SPREP and the ISLANDS website. However, there has been no exchange of experiences with other countries where the ISLANDS Program is implemented, indicating a gap in regional knowledge sharing and peer learning opportunities.</i>		
78	<i>However, these benefits are offset by increased complexity in program management...</i>	It is unclear what evidence was used to determine that the stated complexities fully “offset” the benefits here. Offset implies a net zero result, but this is subjective. Please clarify. Alternatively, the sentence might better be presented in a neutral way, perhaps by saying that, “... <i>these benefits must also consider the increased complexity...</i>”	The evaluation team revised the text to avoid any potential confusion around the term "offset" and to provide a more direct and transparent assessment of the findings.

		It is also important here to discuss the context within which these programs are operating. As highlighted in other comments, projects in the Pacific SIDS operate in a context of limited human resource capacity (in terms of numbers of qualified personnel and level of technical skills); challenges with coordination even at the national level due to the isolated nature of the islands and the cost to travel, among other contextual challenges.	
78	<i>The additionality is evident in several key areas ...</i>	There is an opportunity here to mention the ability of programs to attract co-finance and other donors in general, as indicated in Para 63. Please consider revising accordingly.	The text has been revised accordingly. “...enhanced ability to attract co-financing and leverage additional donor resources.”
82	<u>Footnote 15, pg.38</u>	It is worth noting that the lack of progress in partnership with SWIRE shipping is due to factors outside of the control of IA and EA: the shipping sector has had to recover from the COVID crisis, followed by the current crisis in the Red Sea, which saw shipping routes diverted, and the costs increase. This has led the company to adopt a more risk-averse approach to its philanthropic work, in addition to the complicated nature of the legislative piece of the partnership, i.e., putting in place a fee collection system in Pacific SIDS that will ensure that ELV recycling is a sustainable business. Please consider including this information in the evaluation.	The footnote has been revised to include GEF SEC’s feedback.
84	<i>There were also mentions of high transaction costs in some cases, particularly when compared to other</i>	Please clarify what funding mechanisms are being referenced in this text and provide additional information and evidence on any comparative analysis. If this is a quote, then please identify it as such rather than presenting it as a conclusion by the evaluation.	The text has been revised to more clearly convey the intended message.

	<i>funding mechanisms.</i>		
85	<i>Gender equality has been emphasized to varying degrees across the CPDP, R2R, and ISLANDS programs, with efforts to integrate it into project designs and activities.</i>	As noted in previous comments, this evaluation compares three programs that were designed at very different times during the evolution of the GEF gender policies (and many other policies). Please caveat this.	The text has been revised accordingly. The updated language provides appropriate context and necessary caveats to ensure accurate interpretation of the findings.
90	<i>While the R2R program reported some significant achievements, with certain child projects claiming outstanding outcomes, it is noteworthy that 73 percent of the projects reported unachieved results or outcomes below expectations</i>	Please clarify if any analysis has been done to determine whether some of these results/outcomes may still be achieved after program closure. Many IW projects/programs operate under longitudinal process milestones, and outcomes may only be realized after the implementation window.	The evaluation's findings are based on completed terminal evaluations, which represent the established mechanism for assessing project achievements against their intended outcomes. As per standard evaluation practice, the GEF IEO relies on this formal evidence base rather than speculating about potential future results. The timing of terminal evaluations is specifically designed to assess actual achievements against the projects' results frameworks within their implementation timeframes. This methodological rigor ensures findings are grounded in documented evidence rather than projected outcomes.
91	<i>The ISLANDS program's approach to innovation appears to have been relatively conservative and low risk, primarily</i>	This is very misleading as the ISLANDS program's focus on behavioral change and knowledge management is valuable, especially within a broader strategy to transition towards low-hazard, zero-waste economies in SIDS. The program aims to achieve this by controlling hazardous materials entering SIDS economies,	The text has been revised accordingly, keeping the evidence collected through multiple methods.

	<i>focusing on behavioral change and knowledge management.</i> The regional child project (GEF ID 10267) implemented a reuse workshop in Samoa, aiming to promote the repair and reuse of electronic equipment. It also engaged in the Tide Turners program, which targeted behavior change, particularly among youth. The global child project (GEF ID 10266) focused on developing a central knowledge management system to collect and curate SIDS-relevant resources. Additionally, it developed a strategy for behavior change utilizing modern communication methods such as	managing end-of-life issues for necessary products, and removing existing waste to clean up SIDS ecosystems. Significant behavioral change is key to achieving these goals and ensuring the program's success. We suggest revising this sentence for increased accuracy.	
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	<i>podcasts and a youth-centered app. While these activities incorporate elements of innovation, particularly in community engagement and information dissemination, they generally represent incremental rather than transformative approaches. The program's emphasis on behavioral change and knowledge sharing, while potentially valuable, does not appear to involve high-risk strategies typically associated with more transformational change innovations.</i>		
96 - 100	Monitoring and Evaluation Section	Please present this section in the context of PIFs that are designed by GEF Agencies and evolved significantly to reply to changing GEF policies over the 10+ years of GEF programs evaluated. It is also crucial to state that the	The text has been revised adding a footnote accordingly.

		responsibility for this falls to GEF Agencies, not GEF Secretariat.	
101	<i>... These delays stemmed from issues such as inadequate planning, limited local capacity, bureaucratic hurdles, coordination difficulties among multiple stakeholders, and external shocks like the COVID-19 pandemic</i>	Consider including tropical cyclones and volcanoes in Tonga, considering the evaluation also notes the disruption they caused during implementation.	The text was revised accordingly. <i>“All three programs suffered from implementation delays due to a combination of internal and external factors, reflecting the complex challenges inherent in implementing environmental projects in SIDS contexts. These delays stemmed from issues such as inadequate planning, limited local capacity, bureaucratic hurdles, coordination difficulties among multiple stakeholders, and external shocks including the COVID-19 pandemic and severe natural disasters such as tropical cyclones and volcanic eruptions that particularly affected Pacific SIDS. The impact of these external shocks was evident across the region: Fiji experienced extended COVID-19 lockdowns (2020–2021), Samoa implemented weeks of restrictions (2022), Solomon Islands instituted measures in early 2022, while Tonga faced compound challenges from both COVID-19 restrictions and a devastating volcanic eruption in 2022. Lockdowns ranged from weeks to months depending on infection rates and regional circumstances. The evaluation examines efficiency challenges for each program, GEF Agency performance, and compares average project cycle timelines to the broader GEF portfolio.”</i>
106	Refers to ID 9512 as the Vanuatu project of CPDP.	There seems to be a mixup with project ID numbers here. ID 9512 is the Tuvalu project. Please revise accordingly.	The text has been revised accordingly.
106	Regarding the CPDP Vanuatu project, <i>“In child project GEF ID 9512, delays</i>	This is not necessarily the only conclusion that can be drawn. Sometimes, severe weather cannot be adequately prepared for. Please revise to include such caveat.	The text has been revised to include such caveat.

	<i>occurred due to the contractor underestimating the impact of adverse weather on construction activities. <u>This suggests the need to pay special attention to the selection of contractors.</u></i>		
107	Regarding the CPDP Tuvalu project: <i>"However, its [ADB] reluctance to extend the project beyond 47 months may have compromised the completion of physical works."</i>	Does the TE mention that some physical works were left incomplete? Please clarify.	Based on the documents, there were indeed some incomplete physical works at project closure. Specifically, from the ADB PCR, road signage and road line markings from the second lagoon to the Rentapau bridge were not completed. This is explicitly mentioned in paragraph 12 of the PCR: "Prominent works not completed included road signage and road line markings from the second lagoon to the Rentapau bridge." The PCR notes that in late-2021, MIPU planned for the contractor to apply the line markings and road signs based on design drawings prepared by PWD. There was also an issue with as-built drawings not being available to confirm the extent to which these important road safety features had been implemented. The PCR specifically highlights that the absence of independent supervision resources (due to DSC demobilizing before the end of the defect liability period) may have contributed to the less-than-optimal administration of contract closeout tasks.

			The terminal evaluation (incorporated as appendix 5 of the CPRRP PCR) does indicate that some physical works were left incomplete, particularly road safety features. The PCR notes that "the probability of crashes on this now high-speed capable road represents a significant risk to road users."
125	<i>The evolution from standalone projects to integrated, multi-focal programs</i>	For increased accuracy, please consider revising this sentence to "the evolution from standalone projects, to multifocal programs, to integrated programs..."	The text has been revised as suggested.
Recommendations	General Comment	It would be helpful to look at the question of the lack of dedicated regional entities with specific expertise in project management and substantive areas of the GEF programs, along with the issue of different levels of project management costs in the Pacific and SIDS generally where lack of local expertise requires more expensive external support.	This issue has been acknowledged and revised accordingly in recommendation 3 (see below).
135	<i>Strengthen program effectiveness by improving strategic alignment and operational delivery between parent and child projects.</i>	As this is not an evaluation of GEF's programmatic approach, it would be helpful if there were a specific recommendation for programs in a Pacific context. Please consider revising to include recommendations that are specific to the context being evaluated. In addition, as noted previously, the GEF's work on programs has evolved over the past decade to cover these aspects since 2 of the 3 programs evaluated were designed. Please consider revising to reflect these updates.	We appreciate the Secretariat's comments regarding program evolution and context specificity. While our recommendation draws from analysis of programs in Pacific SIDS, its broader framing reflects that coordination challenges between parent and child projects were consistently observed across the evaluated Pacific programs, despite GEF's evolving programmatic approaches. The recommendation specifically addresses implementation challenges unique to the Pacific context, where geographic dispersion, limited institutional capacity, and complex coordination requirements make strong parent-child alignment particularly critical. The suggested streamlined M&E framework is especially relevant for Pacific SIDS, where simplified yet effective oversight mechanisms can help overcome capacity

			constraints while maintaining program coherence across multiple islands and jurisdictions. Recommendation 1 has been revised as follows: <i>“Enhance coordination and collaboration to maximize development impact and resource efficiency. While existing coordination between governments and international agencies shows promise, there remains significant untapped potential to enhance donor alignment and government engagement for improved project outcomes. Key opportunities exist to strengthen external coherence through expanded partnerships among GEF Agencies and other development partners working in the Pacific. By implementing proven coordination mechanisms and fostering deeper collaboration, organizations can achieve more efficient resource allocation, minimize redundant efforts, and reduce transaction costs for governments. This coordinated approach would ultimately lead to more sustainable and impactful development initiatives that better serve the region's needs while optimizing the GEF's strategic influence through harmonized support systems.”</i>
136	<i>Prioritize robust institutional capacity development to ensure program success and enduring impact. Given implementation constraints in Pacific</i>	It is interesting and notable that this recommendation is specifically highlighting “implementation constraints in Pacific SIDS”. This can be seen in the context of (1) parallel analyses coming to the December 2024 Council on the strength and coverage of the GEF Partnership, (2) ongoing council discussions on agency concentration, (3) past council and replenishment discussions on the potential for agency expansions in SIDS, and (4) the impending,	We appreciate GEF Secretariat's effort to align our recommendation with strategic discussions on GEF Partnership strength, agency concentration, and SIDS expansion. However, the recommendation was generated from direct field observations in Pacific SIDS and addresses a more immediate need: strengthening implementation capacity at national and local levels. Success and sustainability in these regions rely heavily on building practical capabilities within existing governance structures, including traditional knowledge systems and

	<i>SIDS, programs must establish realistic objectives aligned with local institutional capabilities. This requires focused capacity building in project management, environmental governance, and technical skills, supported by systematic performance monitoring. Effective capacity development should leverage existing governance structures, traditional knowledge, and community engagement to ensure sustained project benefits. Programs should emphasize practical training that addresses immediate implementation</i>	inevitable GEF-9 replenishment discussions on accreditation. It may therefore be helpful to clarify this recommendation further to reflect possible IA expansion to Pacific SIDS entities as one possible approach to “prioritizing robust institutional capacity development”.	community institutions. Although broader GEF partnership arrangements are relevant, the urgent priority is empowering local institutions to implement and sustain programs effectively. While exploring complementary approaches, such as expanding implementing agency coverage, could add value, the immediate priority remains to fortify the foundational capacities of institutions directly involved in environmental management and project execution at the country level. Recommendation 3 has been revised as follows: <i>Prioritize robust institutional capacity development to ensure program success and enduring impact.</i> Given implementation constraints in Pacific SIDS, programs must establish realistic objectives aligned with local institutional capabilities. This requires focused capacity building in project management, environmental governance, and technical skills, supported by systematic performance monitoring. Effective capacity development should leverage existing governance structures, traditional knowledge, and community engagement to ensure sustained project benefits. Programs should emphasize practical training that addresses immediate implementation needs while building long-term institutional resilience. This balanced approach will support both timely project delivery and sustainable outcomes beyond project completion. Additionally, to strengthen institutional capacity in Pacific SIDS, the GEF should explore opportunities to accredit regional organizations thereby increasing the pool of qualified GEF Agencies working in the region. Any expansion would need to be balanced against the increased complexity of
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	<i>needs while building long-term institutional resilience. This balanced approach will support both timely project delivery and sustainable outcomes beyond project completion.</i>		<i>managing an expanded partnership and ensuring new Agencies can meet GEF standards and requirements.</i>
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