

EVALUATION OF GEF SUPPORT FOR POLICY COHERENCE

CONCEPT NOTE

Prepared by the Independent Evaluation Office

Contact Person:

Jeneen R. Garcia, Evaluation Officer, Jgarcia2@thegef.org

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I. BACKGROUND

The need for policy coherence

Policy coherence, as defined in Global Environment Facility (GEF) documents, refers to "the systematic promotion of mutually reinforcing policy actions across government departments and agencies, creating synergies towards achieving the agreed objectives." In the context of international development, policy coherence typically entails alignment among environmental, social, and economic policies to support the 2015 Sustainable Development Goals (OECD 2016; 2018). SDG 17 on Partnership for Goals includes Indicator 17.14.1, which tracks the number of countries with mechanisms in place to enhance policy coherence of sustainable development.

Enhancing policy coherence has the potential to mitigate activities driving environmental degradation. Moreover, coherent policies could redirect funding from harmful activities and subsidies to address the environmental financing gap. Estimates suggest that an additional \$711 billion per year, on average, is required to reverse biodiversity decline by 2030 (Deutz et al 2020). Achieving net-zero greenhouse gas emissions necessitates \$3.8 trillion in annual investment through 2025, with only 16% currently deployed by governments, financial institutions, and the private sector (Kozloski et al 2022). Yet approximately \$7 trillion per year is spent on activities contributing directly to climate change, biodiversity loss, and ecosystem degradation, of which \$1.7 trillion comes as environmentally harmful government subsidies (UNEP 2023).

A 2023 World Bank report calculated that governments spend \$1.25 trillion annually on direct subsidies for agriculture, fishing, and fossil fuel alone, while over \$6 trillion is spent to cope with the negative consequences of these subsidies on populations and the environment (Damania et al 2023). However, policy incoherence can also arise across different environmental focal areas, such as climate change and biodiversity. For instance, some countries lacking policy coherence may prioritize meeting carbon emissions targets at the expense of highly biologically and culturally diverse forests (e.g., The Gecko Project 2023, Bennun et al 2021).

GEF support for policy coherence thus far

The GEF is the largest and longest-running family of funds mandated to generate global environmental benefits in the areas of climate, biodiversity, land, chemicals and waste, and transboundary water bodies. With a mandate that cuts across multiple sectors, it has been in a unique position to facilitate policy coherence over its more than 30 years of existence. For example, through its multifocal area projects, it has helped create multisectoral and multistakeholder mechanisms at the national, provincial and village levels; these mechanisms allow environmental, social and economic problems to be discussed simultaneously, and solutions to these problems developed in an integrated manner (GEF IEO 2018a). In its GEF-8 Strategic Positioning Framework, the GEF highlighted the importance of policy coherence to increase funding for reversing environmental degradation while reducing harmful government subsidies (GEF 2022).

Almost all the GEF-8 Integrated Programs already explicitly identify policy coherence as an area of intervention. The Global Biodiversity Framework Fund, ratified in 2023 and for which the GEF also serves as the financing mechanism, uses policy coherence as one of seven criteria for allocating resources. In October 2023, the GEF Council approved a suite of activities to enhance policy coherence across multiple levels of GEF operation (GEF 2023). The approach includes mainstreaming policy coherence in the GEF's country engagement strategy, knowledge management and learning strategy, results-based management framework, and specific funding windows. It considers the possibility of including policy coherence as a variable for calculating funding allocations to countries through the GEF's System for Transparent Allocation of Resources (STAR) index in the future. In coordination with this work, the GEF's Scientific and Technical Advisory Panel (STAP) has developed recommendations on how the GEF can mainstream policy coherence at the project, program and portfolio levels, as well as criteria for screening and monitoring policy coherence-focused projects funded through a competitive window (STAP 2023a, 2023b; Stafford Smith et al 2022).

These documents envision a more intentional role for the GEF in building capacity and creating opportunities for intersectoral dialogue among GEF country focal points and among the different global environmental conventions. In its Seventh Comprehensive Evaluation of the GEF, the GEF Independent Evaluation Office (GEF IEO 2022) noted the GEF's innovations in governance, such as in efforts to increase policy coherence through integrated approaches.

Assessing GEF support for policy coherence

The GEF has a long history of supporting policy development and legal reform in various country contexts and environmental focal areas. Policy support in the GEF is typically through project components dedicated to institutional strengthening, encompassing activities from policy research and development to multistakeholder consultations to awareness-raising. The types of instruments supported include not only policies but also the instruments for implementation, such as statutes, regulations and administrative directives. However, tracking policy-related outcomes, particularly over the long term, has been limited (GEF IEO 2018b).

The GEF's current focus moves beyond project-level policy development and reform to policy coherence across sectors at all levels of GEF support. As this new focus is mainstreamed as a key cross-cutting theme, evidence is needed on how to effectively operationalize and sustain policy coherence at the portfolio, program and project levels.

To track progress on policy coherence in countries (SDG Indicator 17.14.1), UNEP (2020) developed a framework outlining eight domains of a coherent policy environment (see section on Conceptual Framework). However, several factors and contextual conditions influence the degree of policy coherence in a country, making it challenging to implement standardized interventions for increasing or measuring policy coherence. Capacity constraints, both technical and financial, often hinder communication across silos. Political will and culture also shape

policy coherence, alongside coherence in stakeholder values, beliefs, interests, objectives, rules, and structures, among others (Fopa Tchinda and Talbot 2023, Shawoo et al 2022).

The degree of policy coherence may also vary depending on the sector. Sectors such as agriculture, fisheries and fossil fuels have historically received subsidies that encourage wasteful resource use and decrease long-term productivity due to natural resource degradation (Damania et al 2023). The interconnectedness of water, energy and food security presents opportunities for maximizing policy synergies and mitigating trade-offs, but also risks of greater incoherence if policies are developed in isolation.

This evaluation aims to examine the GEF's past efforts in supporting policy coherence, assess preliminary effects of its recent emphasis on this theme on the nature of support provided, and analyze the mechanisms through which it provides this support. The findings of this forward-looking evaluation are expected to help inform the GEF's dedicated programming on policy coherence, enhancing its ability to effectively achieve its mission of generating global environmental benefits. This includes reducing government expenditures on environmentally harmful activities, and directing funding toward policies that restore the environment.

II. KEY QUESTIONS

The evaluation aims to answer three key questions:

- 1) How has the GEF historically supported policy coherence in countries to increase global environmental benefits?
 - a. What types of interventions have proven successful and what challenges have emerged in supporting policy coherence?
 - b. How have outcomes of policy-related activities affected overall project outcomes?
- 2) What insights can previous GEF interventions offer on how policy coherence is enhanced and sustained across different contexts?
 - a. In what ways have GEF activities contributed to sustained (or unsustained)¹ policy coherence?
 - b. What contextual drivers and conditions can the GEF leverage to support policy coherence?
- 3) To what extent is GEF support for policy-related interventions at the portfolio, program and project levels adapting to effectively promote policy coherence?

¹ Sustainability in the [GEF Evaluation Policy](#) is defined as “The continuation/ likely continuation of positive effects from the intervention after it has come to an end, and its potential for scale-up and/or replication; interventions need to be environmentally as well as institutionally, financially, politically, culturally and socially sustainable.”

- a. How does the GEF's previous experience in supporting policy inform the implementation of its new approach?
- b. To what extent is the new approach designed to contribute to increased overall achievement of project outcomes, particularly environmental outcomes?

III. CONCEPTUAL FRAMEWORK

Policy coherence encompasses multiple dimensions: horizontal, vertical, temporal and political. Horizontal coherence refers to alignment of policies across different sectoral ministries or government agencies. This term may also be expanded to include alignment with relevant policies of key stakeholders, such as private and civil society organizations. Vertical coherence refers to alignment across different levels of government, such as between national and municipal sectoral agencies, as well as with policies of regional and global organizations or agreements that a country is part of. Temporal coherence refers to the alignment of future policies with those adopted in the present. Political coherence refers to alignment across the entire policy cycle, from issued identification and analysis, to the development and adoption of policy objectives and instruments, to policy implementation and evaluation.

The broader literature emphasizes not only creating synergies and mitigating trade-offs as outcomes of good policy coherence, but also preventing “leakages”—actions that produce negative effects elsewhere or at a later time—as a result of policy changes (STAP 2023b). This could manifest as natural resource overharvesting in one country to compensate for a harvesting ban imposed in another country, resulting in a net decrease in the natural resource compared to the status quo.

A synthesis of key literature defining policy coherence (STAP 2023, UNEP 2020, OECD 2017) yields the following common components that may be used as policy coherence indicators:

- 1) **Evidence of political commitment to policy coherence.** Political commitment to policy coherence is expressed/endorsed at the highest level of government and formally incorporated into law, strategic frameworks and/or plans.
- 2) **Mechanisms for stakeholder participation.** Stakeholders (e.g., civil society, business, industry, science, academia) from different relevant sectors and levels of government are involved through participatory processes at various stages of the policy cycle in the development of laws, policies, plans, programs, and major development projects.
- 3) **Mechanisms for horizontal coherence.** Mechanisms are in place to for both coordination across sectors, and integration of policy efforts to avoid duplication or conflicts. Such mechanisms include data and information management systems that allow different sectors to share information for more coordinated and integrated decision-making.
 - **Coordination.** Sectoral ministries and agencies can share information, clearly delineate responsibilities, allocate resources, and resolve conflicting or inconsistent mandates, objectives and activities.

- **Integration.** Government and non-government stakeholders can jointly make strategic decisions that help align planning, budgeting, legislation, sectoral programs and policies to simultaneously meet environmental, social and economic objectives. These include mechanisms to track policy coherence in expenditures, and to promote the alignment of both public and private funds to achieve policy coherence. These also include assessing cross-sectoral linkages throughout the policy and planning processes.
- 4) **Mechanisms for vertical coherence.** Mechanisms are in place to align priorities, policies and plans adopted at various levels of government, such as through systematic consultation, collaboration, and alignment of efforts at national, subnational and local levels.
 - 5) **Mechanisms for temporal coherence.** Mechanisms are in place to ensure that long-term considerations are integrated into decision-making, policy development and planning, to account for intergenerational concerns and objectives that go beyond the current electoral cycle.
 - 6) **Mechanisms to monitor, evaluate and report on policy effects.** Mechanisms are in place to systematically monitor and evaluate the effects of policies across sectors (horizontal coherence), including analyzing the potential effects of today's policy decisions on the wellbeing of future generations (temporal coherence). Mechanisms also assess the effects of and consistency across the policy cycle, such as in policy objectives, policy instruments, and implementation/ enforcement practices (political coherence). These mechanisms inform adaptive action to maximize synergies, mitigate negative effects, and address any harmful effects of policies that may occur elsewhere or later (leakages).

These components may exist at different levels of government, and have activities at different stages of the policy cycle. The evaluation's scoping phase found that GEF projects, while not explicitly aiming to achieve policy coherence, contribute to this goal through a range of activities that may build country capacities to establish or strengthen these components, or directly support the development of more coherent policies at specific stages of the policy cycle (figure 1).

Many of these projects are intended to resolve incoherence in specific government activities and/or geographical units, rather than throughout an entire sector. Many project activities focus on increasing coherence in policy implementation in national, subnational and local government structures rather than on policy coherence at the legislative level. In several cases, projects seek to foster greater integration and synergy between different sectoral policies, rather than addressing explicit conflicts in policy objectives. Thus, GEF support for policy coherence may not necessarily address policy incoherence directly, but rather help operationalize opportunities for greater coherence.

Contextual drivers and conditions play a big role in influencing both the outcomes of GEF support and the dynamics of each component. These ultimately shape the extent of policy coherence that is achieved in a particular sector and country context (Fopa Tchinda and Talbot 2023, Shawoo et al 2022, Nilsson et al 2012).



Figure 1. Conceptual framework for how policy coherence leads to positive environmental outcomes, and how GEF support contributes to policy and institutional outcomes

Figure 1 illustrates the conceptual framework that this evaluation will use to identify areas of effective GEF support for policy coherence, and areas for potential improvement. The evaluation will also look at the interactions between GEF support and contextual drivers and conditions to identify leverage points for enhancing outcomes, and mitigating their negative effects.

IV. METHODOLOGICAL APPROACH

The evaluation will answer the three key questions by assessing GEF activities at the portfolio/corporate, program and project levels. The evaluation will have a forward-looking approach by assessing completed and ongoing activities with the aim of providing inputs to current and future GEF programming.

To determine changes in the GEF's approach to policy support, GEF-8 activities will be primarily compared to those in GEF-6 and GEF-7, when its focus shifted to more integrated programming. Integrated programming, by its nature, requires coordination across multiple sectors and administrative scales to tackle drivers of environmental degradation; thus, this integrated focus will serve as a baseline for how the GEF has previously helped enhance policy coherence in countries. Earlier projects will be assessed using specific criteria as appropriate. The total number of programs, projects and case studies to be analyzed will be finalized after further screening and stakeholder inputs. Policy coherence indicators from the literature will be adapted to the GEF context and used as benchmarks (see some proposed indicators in Conceptual Framework section above). STAP guidance on policy coherence may be used as a

basis for assessing program theories of change. Table 1 summarizes the data sources and methods for each evaluation question.

Portfolio / corporate level

The evaluation will focus on corporate activities identified in the GEF's 2023 strategy document as areas for mainstreaming policy coherence:

- Country Engagement Strategy, especially the National Dialogues
- Knowledge Management & Learning Strategy
- Competitive and Innovation Windows
- Program and Project Screening
- Results-Based Management Framework, especially the Core Indicators

Features of these corporate strategies and processes will be compared to their precursors in GEF-6 and GEF-7 on how they deliberately enhance and track policy coherence within countries, and in relation to international institutions such as GEF Agencies and the Conventions. Data will be collected through **document analyses**, **key stakeholder interviews**, **focus group discussions**, and **observation of corporate processes** at the country and regional levels. An **online survey** of GEF stakeholders will also be administered to gather perceptions on the extent to which the GEF has enhanced policy coherence prior to GEF-8, which activities have facilitated this, and potential future activities that could help achieve this aim.

Program level

The evaluation will assess program framework documents (PFDs) on the degree to which they consider policy coherence issues when analyzing environmental drivers, and in designing program components and child projects. PFDs will also be assessed on their use of policy-related indicators, where relevant. Policy-related outcomes will be analyzed in completed programs, including program- and context-related variables that have contributed to their success or lack of success in this area. Data will be collected through **document analyses** and **key stakeholder interviews** to compare programs across GEF replenishment periods, with a focus on the Integrated Programs.

Project level

A **portfolio review** of projects funded from GEF-6 and onwards will identify the types of policy coherence support the GEF has provided, at which stages of the policy cycle, and targeting which sectors. This will include projects that are both active and completed.

A sample of completed projects working in sectors known for policy incoherence (e.g. agriculture, tourism, fisheries, water) will be assessed to identify any missed opportunities for crucial policy coherence support. Project documents will be assessed on their extent of policy coherence analysis vis-a-vis the design of activities to meet stated project objectives. Projects with policy coherence as a main objective will be analyzed for their use of policy-related

indicators and outcomes, as well as project- and context-related variables affecting their success.

Field-based case studies will provide more in-depth information on project- and context-related variables affecting achievement of policy coherence-related objectives. They will also assess progress in policy coherence since project completion. Case study projects will be selected based on their focus on policy coherence as a main objective, focal area representation, geographical representation, country type and size, and high potential for deriving lessons for the GEF's policy coherence programming, among other criteria. Where possible, case studies will be conducted in synergy with the GEF IEO studies on behavior change and broader adoption, which can provide insights on how policy support translates to sustained behavioral and environmental change on the ground.

Table 1. Summary of methods and information sources that will be used to answer each key evaluation question. The total number of programs, projects and case studies to be analyzed will be finalized after further screening and stakeholder inputs.

KEY EVALUATION QUESTION	DATA COLLECTION & ANALYSIS METHODS	DATA & INFORMATION SOURCES
1) How has the GEF historically supported policy coherence in countries to increase global environmental benefits? a. What types of interventions have proven successful and what challenges have emerged in supporting policy coherence? b. How have outcomes of policy-related activities affected over-all project outcomes?	PORTFOLIO LEVEL Document analyses Key stakeholder interviews Focus group discussions Online stakeholder survey Observation of corporate processes PROGRAM LEVEL Document analyses Key stakeholder interviews PROJECT LEVEL Portfolio review Field-based case studies	PORTFOLIO LEVEL ▪ GEF-6/7 strategy documents ▪ Corporate-level and country-level stakeholders ▪ Other IEO corporate evaluations PROGRAM LEVEL ▪ GEF-6 & -7 Program Framework Documents Council-approved as of 31 December 2023 (n=30) ▪ Program Coordinators of relevant programs ▪ Other IEO program evaluations PROJECT LEVEL ▪ GEF-6 & -7 CEO-endorsed project documents as of 31 December 2023 ▪ Terminal evaluations of completed GEF-6 & -7 projects validated as of 31 December 2023 (n=114) ▪ Stakeholder interviews and field visits on completed projects in selected countries (n>2; TBD) ▪ Other IEO case studies
2) What insights can previous GEF interventions offer on how policy coherence is enhanced and sustained across different contexts?	PORTFOLIO LEVEL Key stakeholder interviews Focus group discussions Online stakeholder survey	PORTFOLIO LEVEL ▪ Corporate-level and country-level stakeholders ▪ Other IEO corporate evaluations PROJECT LEVEL

a. In what ways have GEF activities contributed to sustained (or unsustained) policy coherence? b. What contextual drivers and conditions can the GEF leverage to support policy coherence?	PROJECT LEVEL Field-based case studies	▪ Stakeholder interviews and field visits on completed projects in selected countries (n>2; TBD) ▪ Other IEO case studies
3) To what extent is GEF support for policy-related interventions at the portfolio, program and project levels adapting to effectively promote policy coherence? a. How does the GEF's previous experience in supporting policy inform the implementation of its new approach? b. To what extent is the new approach designed to contribute to increased over-all achievement of project outcomes, particularly environmental outcomes?	PORTFOLIO LEVEL Document analyses Key stakeholder interviews Focus group discussions Online stakeholder survey Observation of corporate processes PROGRAM LEVEL Document analyses Key stakeholder interviews PROJECT LEVEL Portfolio review Field-based case studies	PORTFOLIO LEVEL ▪ GEF strategy documents ° GEF-6/7 vs GEF-8 ▪ GEF project/ program screening templates ° GEF-6/7 vs GEF-8 ▪ Corporate-level and country-level stakeholders ▪ National Dialogues and other corporate processes ▪ Other IEO corporate evaluations PROGRAM LEVEL ▪ Program Framework Documents ° GEF-6 & -7 Council-approved as of 31 December 2023 (n=30) ° GEF-8 Council-approved as of 30 June 2024 (n>19; TBD) ▪ Program Coordinators of relevant programs ▪ Other IEO program evaluations PROJECT LEVEL ▪ Project documents ° GEF-6 & -7 CEO-endorsed projects as of 31 December 2023 (n=1257) ° GEF-8 CEO-endorsed projects as of 30 June 2024 (n>12; TBD) ▪ Stakeholder interviews and field visits on completed projects in selected countries (n>2; TBD) ▪ Other IEO case studies

V. SCOPE AND LIMITATIONS

In this evaluation, the term “policy” will refer to a range of policy instruments -- including laws, strategies, plans, programs and implementing regulations -- that 1) are intended to achieve the government’s environmental policy objectives, and 2) have been adopted through formal legislation or as part of the regular activities of a ministry or sectoral public agency. Individual

programs or projects beyond the government's regular operations are excluded from this definition. The term "policy coherence intervention" will refer to any GEF-supported activity that aims to build institutional capacity for policy coherence (e.g. training for interministerial coordination), or help develop more coherent policies (e.g. multistakeholder consultations, policy studies). Given the topic's broad scope and nuances, the evaluation's conceptual framework and working definitions of these terms will be further refined in dialogues with key stakeholders. This will help ensure that the evaluation scope and findings are meaningful and useful for GEF programming.

The evaluation will focus primarily on policy coherence across different government sectoral agencies (horizontal coherence). This type of coherence is most expected to reduce conflicts in natural resource use objectives, and potentially integrate efforts toward rehabilitating and protecting the environment. This will be one of the key criteria to be used in identifying the portfolio of projects to be analyzed. All other types of policy coherence will be assessed to the extent that they support the adoption and implementation of intersectoral policies at other political, administrative and temporal scales. Interventions that promote policy alignment between different levels of government but within the same sector will not be evaluated for promoting policy coherence.

There is currently no straightforward way to identify GEF projects with a policy coherence focus. The evaluation will take a multipronged approach in defining the portfolio of projects to be reviewed, which will include keyword filters, preliminary document analyses, stakeholder inputs, and potentially AI-assisted searches. Given the number of projects to be screened and reviewed (see table 1) within the evaluation timeline, a sampling approach may be taken in lieu of reviewing the entire population of projects and programs that meet the criteria for in-depth review.

Given that the focus on policy coherence was only approved by the GEF Council in October 2023, some of the outlined activities may still be in the early stages or have yet to be started before the findings are presented to the GEF Council and Replenishment Group. The evaluation will take this caveat into account when framing the findings, using a forward-looking lens.

VI. RESOURCES

Evaluation Team

The evaluation will be led by Jeneen R. Garcia, Evaluation Officer, with team members consisting of one senior evaluation expert on policy coherence and two evaluation analysts. Local country consultants may support the case study missions. Internal and external peer reviewers will be engaged to provide feedback on draft evaluation products.

Timeline

The evaluation is scheduled to be presented at the June 2025 Council and will be used as input to the Eighth Comprehensive Evaluation of the GEF (OPS8). Evaluation findings will be disseminated after it is presented to the Council through, among others, print publications and events targeted at different stakeholder groups. Table 2 outlines the schedule of evaluation activities.

Table 2. Evaluation Timeline

PERIOD	ACTIVITY
February - May	Scoping phase – literature review, initial interviews, focus groups discussions and portfolio analysis Development and approval of concept note Preliminary identification of portfolio and case study countries Focus group discussions with key corporate-level stakeholders
June - July	Hiring of consultants Development of tools for portfolio reviews (programs and projects), case studies, and online survey Corporate and country stakeholder interviews Portfolio reviews
August - November	Portfolio reviews and data analysis Field visits / stakeholder interviews (Azerbaijan and Georgia, Zimbabwe, Panama, TBD) Observation of corporate processes (National Dialogues, Target 18 Workshop, TBD) Corporate and country stakeholder interviews Online survey
December 2024 – February 2025	Analysis and synthesis of data, report-writing
March 2025	Revision and circulation of draft report
April 2025	Presentation of initial findings to Replenishment Group
May 2025	Finalization and uploading of report
June 2025	Presentation at Council
July 2025 - onwards	Dissemination activities

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