

Audit Trail Paper of the AUGUST 31 Draft Report of the Impact Evaluation of GEF IW Support to the SCS and Adjacent Areas
10 DECEMBER 2012

No.	Name	AFFILIATION	Chapter	Background	Comment	Response
1	Long Rithirak	Cambodia	Chapter XI: General Comment		I note that Cambodia and Sihanoukville initiatives have not been covered as extensively as other countries/sites in the South China Sea region, despite the fact that you have conducted site visits and meetings the national and local levels in Cambodia. Perhaps this matter needs to be addressed by the Evaluation Team, and appear in the next revised draft	The Cambodia sites are generally not extensively discussed because they were not part of the initial random sample, but only used as illustrations. There is extensive coverage of the memorandum between Cambodia and Vietnam as one of the main accomplishments stemming from GEF support in the SCS.
2	Chua Thia-Eng	PEMSEA East Asian Seas Partnership Council	General Comment		Noted a large part of the document tends to be focusing on the UNEP sponsored COBSEA , GEF/UNEP South China Sea project and the GEF/UNDP PEMSEA projects.	These two are the main streams of GEF funding that have specific regional-scale activities and are also the longest-running, which have built on previous work of COBSEA and other initiatives of regional organizations.
3	Chua Thia-Eng	PEMSEA East Asian Seas Partnership Council	Chapter XI		The last Chapter XI appears to be focusing on assessing PEMSEA, which I believe is not the objective of this exercise.	The primary focus of this chapter is to assess the extent to which broader adoption has taken place, and the factors affecting progress to broader adoption. ICM is further along on the processes of broader adoption, which makes it an important case study. At the regional scale, as indicated in the report, the broader adoption of PEMSEA as a regional mechanism is the focus of the discussion, because "it is for now the only regional implementing mechanism supported by the GEF that is operational in the SCS." (p.140, para. 416)
4	Chua Thia-Eng	PEMSEA East Asian Seas Partnership Council	General Comment		One would expect the analysis to address: (1) the overall and specific impacts of those GEF projects that are implemented exclusively in the South China Sea area.	GEF Council has specifically requested the EO to carry out an evaluation of the over-all GEF support to a water body, as evaluations of specific project could not capture the over-all reach of GEF support in the IW focal area.
5	Chua Thia-Eng	PEMSEA East Asian Seas Partnership Council	General Comment		One would expect the analysis to address: (2) impacts of other GEF projects with larger geographical responsibility beyond the South China Sea, such as PEMSEA or projects in adjacent areas such as the Yellow Sea project, on the target area.	The Evaluation approach paper clearly indicates that the evaluation would focus on the impacts of GEF support in the South China Sea, and only for specific purposes (more of a contextual and comparative nature) would deal with other water bodies in the EAS.
6	Chua Thia-Eng	PEMSEA East Asian Seas Partnership Council	General Comment		In making the impact assessment, it is expected that the evaluation would shed light on how current GEF projects build upon past and existing regional efforts, such as those of COBSEA and SEAFDEC, and their cumulative impacts on state of the environment of the target area	The Evaluation establishes the regional baseline prior to GEF support and indicates that GEF support is built on the regional initiatives that had been undertaken by the countries.
7	Chua Thia-Eng	PEMSEA East Asian Seas Partnership Council	General Comment		Although there are substantial investments from GEF and other donor agencies in supporting the efforts of environmental management in the South China Sea and the East Asian Seas at large, the investments that actually trickle down to local implementation is limited (relative to number of countries and severity of environmental damages in the region). In addition, it is recognized that the large financial investment required for environmental improvements, scientific investigations, and capacity development are ultimately the responsibility of the countries to shoulder in order to make things happen. As such, the role of GEF investment is to catalyze national environmental investments, facilitate national coastal and ocean policies or legislation, build management capacity, develop methodologies and facilitate science-based management actions. It is impossible to expect that, with the size of the problem and the current level of GEF investment, the degraded environmental conditions of the SCS and that of the East Asian Seas will be reversed in a short time. The focus of the evaluation would have been expected to explore how GEF projects complemented each other in terms of activities and how future collaborative efforts should be directed to increase the cost efficiency of GEF project implementation. This is not evident in the draft evaluation report.	This has been done by not focusing on specific projects but streams of funding and assessing the extent and forms in which these interact. The topic of handling future collaborations and coordination is addressed in the recommendations.
8	Chua Thia-Eng	PEMSEA East Asian Seas Partnership Council	Chapter XI: Paragraphs 37 - 43		Evaluation Report first casts doubt over the establishment of the PEMSEA as a functional regional mechanism and then proceeds to question the integrity of the 8 governments who have accorded international legal personality to PEMSEA. PEMSEA was endorsed by 11 countries and 12 partners as a regional mechanism in 2006 with the specific purpose of implementing the Sustainable Development Strategy for the Seas of East Asia (SDS-SEA) and later on in 2009 by 8 countries recognizing its international legal personality following the required internal legal process of the respective countries. The few countries who have not signed the agreement cited delays due to legal complications in their respective internal processes and other reasons. Therefore the statement of the Evaluation Report .it is not clear how many countries have given their formal consent..." has cast doubt over the integrity of the organization and the countries who sent their consent following their internal procedures. It is not clear to me the real intention of making such a statement.	The Evaluation Office is not making a statement on anyone's integrity. It is just stating that from the text it did not find it clear which of the countries that signed the agreement had met the conditions for the agreement to come in to force. This information was a requested by Aaron Zazueta to Raphael Lotilla in an email on December 1, 2011. The reply by Mr. Lotilla did not sufficiently clarify the conditions. The explanation of the process followed prior to signature of the agreement which is now provided by PEMSEA provides sufficient evidence that the conditions were met, thus this text is not included in the final report of the evaluation.
9	Chua Thia-Eng	PEMSEA East Asian Seas Partnership Council	Chapter XI: Paragraphs 37 - 46		Finally the paragraphs craft the supposed concerns of some Southeast Asian countries over the stronger influence of the Northeast Asian countries who contributed financially to the operating funds of the PEMSEA Secretariat. The Evaluation Office stated that"... some of the ASEAN countries are concerned that Northeast Asian countries have too strong of an influence on PEMSEA, which is reflected in the contributions that countries make to PEMSEA...". Such a statement might have some market in the region, especially when there are escalating border dispute issues in the South China Sea. However, the fact that the Northeast Asian countries make annual financial contributions to PEMSEA's operating cost does not mean they will necessary have any stronger influence on PEMSEA than any other country. The Evaluation Report failed to provide any evidence to substantiate such statement. It is necessary for PEMSEA to engage all countries in the region, irrespective of whether they are GEF benefiting nations. Such statement could be very damaging to PEMSEA and even self-jeopardizing the GEF effort to help build a sustainable regional ocean mechanism to implement the long term marine strategy and action plans. It does not add value to the future repositioning of GEF international waters nor to the sustainability of PEMSEA, which has gone so far over a span of 20 years of regional efforts to forge regional partnerships and build financial sustainability. If countries like China, Japan and RO Korea discontinued their annual contributions because they do not want to be seen as dominating the region, as alleged, will that bring any benefits to the self-sustainability of a regional mechanism or contribute to forging greater partnership for this region?	These concerns were communicated by country representatives to the EO. The EO understands the sensitivity and has made modifications to the text. However, the concern remains that the extent of country support to regional organizations is very relevant to the likelihood of progress towards impact of GEF support in the region.
10	Chua Thia-Eng	PEMSEA East Asian Seas Partnership Council	Chapter XI: Paragraphs 37 - 44		In fact, Thailand who has not signed the various agreements from 2006 onwards has been actively participating in PEMSEA's activities and is an observer to the EAS Partnership Council for all Council meetings. Malaysia on the other hand, chose not participate in the current GEF/ PEMSEA project, although the local government of Klang continues to implement ICM programs in close collaboration with PEMSEA, and remains an active member of the PEMSEA Network of Local Governments.	The evaluation has not identified any specific country with regards to this point.

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11	Chua Thia-Eng	PEMSEA East Asian Seas Partnership Council	Chapter XI: Paragraphs 37 - 45		The fact is most countries bordering the South China Sea: China, Cambodia, Thailand, (Malaysia-Kang), Vietnam, Singapore, Philippines are all involved in PEMSEA activities.	This fact is acknowledged throughout the evaluation. The point made by the evaluation is that some countries do not see the need for more regional organizations, and are currently not providing financial support towards regional costs.
12	Chua Thia-Eng	PEMSEA East Asian Seas Partnership Council	Chapter XI: Paragraph 39		The Evaluation Office should be aware that PEMSEA has taken a different path in addressing regional ocean governance in an area with complex political, socio-economic, cultural and capacity diversities; a model that is different from the usual regional sea conventions with mandatory financial contributions from the countries. Much has been learned from the operation of the COBSEA model, which has led PEMSEA to take a different path. GEF has been funding this effort to nurture the development of such alternative model, obviously with increasing buy-ins from country and non-country partners.	The evaluation acknowledged the complex situation of the region at several points in the text. Also, the evaluation does not advocate any one specific model but rather merely looks into other approaches to shed light to the regional mechanism supported by the GEF in the region.
13	Chua Thia-Eng	PEMSEA East Asian Seas Partnership Council	Chapter XI: Paragraph 40		The countries are now developing their national SDS-SEA plans ready for implementation as part of the final phase of GEF support. This final phase will also see the completion of PEMSEA's transformation into a self sustaining regional body to implement the SDS-SEA over the long-term. PEMSEA country and non-country partners are well aware of the limited timeframe of continuing GEF support.	Information on PEMSEA's plans for financial sustainability are acknowledged in the final report.
14	Chua Thia-Eng	PEMSEA East Asian Seas Partnership Council	Chapter XI: Paragraph 41		As the chair of the Governing Council, I have repeatedly cautioned our PEMSEA staff, country and non-country partners that we have to graduate from GEF and take a self-sustaining path through PEMSEA's transformation. We are reaching there with more countries and partners contributing in various ways in the activities of PEMSEA either in annual contribution, co-financing or co-organizing activities.	Same as above it has been noted in the final report PEMSEA's plan and efforts to develop a self-sustaining path. However the point that the evaluation refers to financing of the costs of an enhanced PRF. It is not clear who will pay the bill of the expanded service structure that GEF is asked to support. The evaluation is merely pointing out that this implies risks to GEF support.
15	Chua Thia-Eng	PEMSEA East Asian Seas Partnership Council	Chapter XI: Paragraph 42		Unfortunately, the Evaluation Report misinterpreted my opening remarks at the 11th Executive Committee Meeting.	Noted and the text has been revised
16	Chua Thia-Eng	PEMSEA East Asian Seas Partnership Council	Chapter VI: Box 1		The content of this box could give rise to wrong perception that the UNDP/PEMSEA stream did not consider the existence of the East Asian Seas Action Plan and overlaps of activities.	The intention of the box is to indicate that GEF support in the region has enabled the implementation of activities previously identified by regional instruments that had not been funded. The text has been modified to make this more explicit.
17	Chua Thia-Eng	PEMSEA East Asian Seas Partnership Council	Chapter VI: Box 1	The content of this box could give rise to wrong perception that the UNDP/PEMSEA stream did not consider the existence of the East Asian Seas Action Plan and overlaps of activities.	The information on GEF/PEMSEA stream should be clearly and factually presented. The first phase of the GEF/PEMSEA stream was formulated upon the request of ASEAN/COST and later on expanded in geographical scope to cover other countries within the East Asian Sea boundary. The project focused on pollution prevention and management through the application of ICM at the local level through the setting up of ICM demonstration sites, developing sustainable financing, and strengthening local capacity development. The Straits of Malacca project was also formulated to explore how best to manage transboundary pollution arising from shipping traffic and land-based pollution. The outcome of this project gave rise to another project on the Marine Electronic Highway implemented by World Bank and IMO.	Noted
18	Chua Thia-Eng	PEMSEA East Asian Seas Partnership Council	Chapter VI: Box 1	From the text: "The first project in the UNDP/PEMSEA stream (GEF ID 396) worked on the standardization of pollution monitoring methods, and the exchange of technology and expertise among countries, targets that are also identified in the EAS Action Plan."	Although it is true that marine pollution is included in the UNEP/COBSEA East Asian Sea Action plan, none of the activities undertaken by the GEF/PEMSEA stream duplicate COBSEA activities during that time instead they were complementary. As pollution is a very serious issue and needs to be addressed from a more holistic approach, the design of the project was to focus on management of pollution using an ICM approach. It is therefore not factual that "The first project in the GEF/PEMSEA stream worked on the standardization of pollution monitoring methods, and the exchange of technology and expertise amongst countries targets that are identified in the EAS Action Plan." as stated in the Box.	The intention of the box is to indicate that GEF support in the region has complemented and enabled the implementation of activities previously identified by regional instruments that had not been funded, not the duplication of these efforts. The text has been modified to make this more explicit. More specifically, the text has been changed to "The first project in the UNDP/PEMSEA stream (GEF ID 396) worked on the standardization of pollution monitoring methods, and the exchange of technology and expertise among countries—targets that had been identified in the EAS Action Plan—within the ICM framework."
19	Chua Thia-Eng	PEMSEA East Asian Seas Partnership Council	Chapter VI: Box 3		The formulation of the SDS-SEA in the second phase of the GEF/PEMSEA arose from the need to integrate the implementation of environment and resource-related international conventions and regional action plans (including that of the East Asian Action Plan of UNEP/COBSEA) into a regional marine strategy. The rationale was to provide a concentration of regional efforts and focus in responding to sustainable development challenges, as clearly indicated in the Ministerial Declaration in Putrajaya in 2003. The SDS-SEA is a comprehensive regional marine strategy that responds to many provisions of the Plans of Actions of the World Summit on Sustainable Development of 2002. It is now even more relevant in the implementation of the Rio+20 "The Future We Want". Throughout the implementation of the SDS-SEA, PEMSEA has been cooperating with UNEP/GPA and COBSEA in the implementation of activities related to marine litter, and other activities related to GPA.	Noted. This additional information has been included.
20	Chua Thia-Eng	PEMSEA East Asian Seas Partnership Council	Chapter VI: Paragraph 150	The following statement is incorrect: " In 2009, eight of the partner countries indicated intentions to acknowledge PEMSEA as having an international legal personality separate from PEMSEA as a GEF project"	In 2006, through the Ministerial Haikou Declaration, PEMSEA, which was still a project of GEF, was formerly recognized as a regional mechanism for the implementation of SDS-SEA. However, it was acknowledged that the implementation of the SDS-SEA would take much longer time than GEF project duration. The need to explore the international legal personality was considered by a legal committee set up to examine the legal requirements in achieving the status. By 2009, eight countries had signaled their willingness to accord PEMSEA international legal personality status, following completion of their internal procedures and protocol. They signed the agreement during the 2009 EAS Congress in Manila. Whilst only three countries are needed (including the host country) to provide the legal personality to enable PEMSEA to function as an international organization, efforts were made to secure all the member countries to sign, again recognizing that each country has different internal procedures. For your information, when the International Rice Research Institute (IRRI) was formerly established there were only 4 countries submitting their recognition. Japan took a long time, as usual, in going through the international process. Similarly, Indonesia did not join SEAFDEC until several years later.	The explanation of the process followed prior to signature of the agreement which is now provided by PEMSEA provides sufficient evidence that the conditions were met, thus this text is not included in the final report of the evaluation.

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21	Chua Thia-Eng	PEMSEA East Asian Seas Partnership Council	Chapter VI: Paragraph 176 - 188	Reading through these paragraphs, it appears that UNEP/COBSEA and ASEAN were deliberately by-passed by GEF as suitable institutional candidates for implementation of the GEF/PEMSEA streams instead GEF/UNDP selected IMO as executing agency for the first and second phase (para 179). At the footnote of page 65, "ASEAN and COBSEA were both part of the discussions during the development phase of the project proposal. Some of the persons engaged in the preparation of the project indicated in interviews for this evaluation that at the time in was felt that ASEAN was a difficult organization to work with as there were many tensions amongst countries, and that COBSEA, largely financed by UNEP, did not have the support of all the participating countries."	It is therefore necessary to understand the historical perspective leading to the formulation of the first and subsequent projects of PEMSEA. In 1992-1993, UNDP as an implementing agency of GEF initiated a project formulation team consisting of 3 experts from USA, United Kingdom, Australia and 4 from international / UN organizations (UNEP/COBSEA, IMO, ICLARM and ASEAN). I, a staff member of ICLARM and from the ASEAN region, was appointed as the Team Leader. Throughout the process of project formulation, the COBSEA coordinator and the ASEAN member participated in all meetings and deliberations as the project formulation report was a consensus document and not based on individual opinion. It is true that the Project team consulted all the participating countries (including both ASEAN and non-ASEAN countries), UN and international organizations and the ASEAN Secretariat with regard to proposed project activities and executing agencies. The countries were specifically asked to consider COBSEA or ASEAN as potential institutions for implementing the project. COBSEA coordinator had all the opportunities to present the case as a member of the Project Formulation Team. It was also recognized that IMO did not have the competency in ICM whilst they could contribute much in the Malacca Strait subproject. While formulating the project, the team did not identify the executing agency. UNDP was asked to look into the issue of executing agency taking into consideration the consultations made as well as the geographical coverage of the project over 6 sub-regional seas. Using the same argument as presented in this Evaluation Report regarding PEMSEA's executing agency, it is ironic why COBSEA and ASEAN were not considered as the executing agency of the GEF/UNEP South China Sea Project, recognizing that the project was entirely within the geographical scope of South China Sea and within the roles and responsibilities of the two organizations. Furthermore, some of the identified project activities clearly fall in line with those in the East Asian Seas Action Plan (para180). Moreover, one fails to understand why the project was not implemented by COBSEA, since UNEP is responsible for both COBSEA and the South China Sea project.	Noted. The constraints on the choice of implementing and executing agencies for both GEF funding streams are acknowledged in Section 6.2 of the final report.
22	Chua Thia-Eng	PEMSEA East Asian Seas Partnership Council	Chapter VI: Paragraph 179	The purpose of GEF/PEMSEA stream was taken out of context with the statement: The third phase of the project approved in 2007 focused on supporting a newly created regional mechanism involving countries that were members of COBSEA and NOWPAP".	The purpose of GEF/PEMSEA stream was taken out of context with the statement: The third phase of the project approved in 2007 focused on supporting a newly created regional mechanism involving countries that were members of COBSEA and NOWPAP". The second phase of the project focused on the development of the SDS-SEA and the preparation of the countries partners to implement the regional marine strategy. The third phase highlights SDSSEA implementation and the transition of PEMSEA from a project to an independent international organization. The three phases of the GEF/PEMSEA project reflect consistent, continuous and concerted efforts of the region to move forward in coastal and regional governance of the seas of East Asia, through the SDS-SEA and the implementing mechanism. It is also the intention to move away from fully reliance on GEF or other donors but towards a self-sustainability path.	Noted. Additional information on the function of PEMSEA included.
23	Chua Thia-Eng	PEMSEA East Asian Seas Partnership Council	Chapter VI: Paragraph 179	Inaccuracy with "COBSEA chose not to be a PEMSEA partner because some member countries raised the inappropriateness of COSEA as in intergovernmental body becoming a non-country partner of a "project entity".	As a partnership-based organization, PEMSEA believes in "give and take" and therefore continues to welcome the participation of COBSEA as a partner or collaborator. The SDS-SEA provides the framework and opportunity for PEMSEA and COBSEA to work together. COBSEA is always welcome and in no instance was an invitation from COBSEA, UNEP or GEF/UNEP SCS stream declined or not attended to. As such the statement in para 185 appears to accuse PEMSEA of not willing to cooperate. You cannot expect to clap with one hand! It is not duplication in activities as there are ample areas that can be undertaken by both, in a complementary manner, even in a common issue such as marine pollution. The Evaluation Office should provide incidences when PEMSEA refused to cooperate or respond to any invitation to collaborate, which has resulted in so-called duplication.	The statement refers to a choice taken by COBSEA, not by PEMSEA. It is not a judgment on PEMSEA but a statement of fact based on COBSEA's meeting reports. This has been moved from the main text.
24	Chua Thia-Eng	PEMSEA East Asian Seas Partnership Council	Chapter VI: Paragraph 180		The fact is PEMSEA has been involved in addressing marine pollution using an ICM approach through its demonstration sites since 1994, it is difficult to understand why PEMSEA is duplicating or competing with the GEF/UNEP SCS project which was implemented several years later. The evaluation fails to understand that PEMSEA's ICM approach adopts a holistic and integrative approach in environment and resource management, which address the issues of pollution, habitat degradation, loss of resources, livelihoods, etc. in a holistic and integrative manner. Thus it is inaccurate to say that PEMSEA moved into habitat management (Para 186).	The differences and similarities between the UNDP/PEMSEA and UNEP/SCS approaches to habitat management are further clarified in Sections 6.2 and 7.1 of the final report.
25	Chua Thia-Eng	PEMSEA East Asian Seas Partnership Council	Chapter VI: Statement before Paragraphs 190-192	From text "Low coordination within the GEF partnership, increased transaction costs to countries, and ongoing border disputes among countries may require the repositioning of GEF support in the region. "	This is very true and the need to facilitate coordination starts from the implementing agencies. Obviously UNEP and UNDP are key implementing agencies for most of the GEF projects in the region and therefore duplication can be avoided right from the beginning and not put the blame on the projects. Once a project has been formulated and approved, the role of the project office is to implement the project activities according to the project document and meeting performance targets. There is no room for them to move the project around. However, one should recognize that the situation in South China Sea is politically, socio-culturally and economically complex and the environmental issues will need much more time and commitment to resolve through national and regional efforts. The border disputes are not new; they were in existence before these GEF projects were developed.	The evaluation recognizes the importance of larger contextual factors affecting progress to impact, and the theme of complexity is central to the evaluation throughout. Coordination among the projects is a key feature of the IW operational programs and was expected and included in project documents.
26	Chua Thia-Eng	PEMSEA East Asian Seas Partnership Council	Paragraphs 190-193		The approach taken by PEMSEA is not to be involved with these disputes, which are politically sensitive, but to help bring the partner countries together to understand each other and tackle activities that will promote environmental improvement and harmony in the region. After two decades, PEMSEA has proven that partnership efforts work well, to some degree, to address many of the environmental and ecosystem issues at the local level. The large geographical scope of East Asian Seas has enabled PEMSEA to avoid the sensitive, non-environmental issues and focus on those that could be resolved in a collective manner. The SDS-SEA is designed with due consideration to the sensitivity in the South China Sea, which may take a generation to resolve.	Noted. This is the general approach of GEF in the region.
27	Chua Thia-Eng	PEMSEA East Asian Seas Partnership Council	Paragraphs 190-194		While there are a number of regional organizations operating in the region, few are focusing on coastal and ocean governance. The so-called overlaps or duplications are more generic (e.g., pollution, habitats) than actual operation (on-the-ground activities). Organizations such as COBSEA, which have been operating in the region for more than 30 years, may be strong enough to withstand institutional challenges, including those identified in the evaluation report. PEMSEA, on the other hand, is a relative newcomer as a regional organization and is prepared to close down if the Country and Non-country Partners find that the "partnership" has no further relevance at the country and/or regional level. As I said previously, the essence of partnership is mutual benefit and "give-and-take".	Noted

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28	Stephen Adrian Ross	PEMSEA	General Comment		"In May 2012 PEMSEA reported to the Evaluation Office that there were no problems with the implementation of the IIMS." This is not correct. In our May 2012 response, we informed the GEF EO of the many challenges that we experience in developing and sustaining IIMS at local level, and went on to explain the approaches being taken at the local level to address these challenges. We do not understand how the Evaluation Office interpreted our response as "no problem".	In a PEMSEA reply (May 2012) to a GEF EO inquiry on specific questions referring to IIMS as a technological package, PEMSEA responded "nil" on all accounts, citing as an explanation only the lack of direction and ownership in the use of IIMS in Manila Bay when the demonstration there ended. This only acknowledges problems with implementation of the technology and the inherent problems of persuading governments commit to the information technologies introduced by the program, but not problems with IIMS itself as a technological package that may not be suited to local conditions.
29	Stephen Adrian Ross	PEMSEA	Chapter XI: Paragraphs 36 - 37	From text: "...In 2009, with PEMSEA now an independent organization able to enter into contracts, 3 of the 7 GEF-supported countries bordering the SCS did not sign the Agreement Recognizing the International Legal Personality of PEMSEA. (new paragraph) It is not clear if the conditions have been met for the agreement to come into force. The agreement states that it "shall enter into force on the date on which at least three Parties, including the Host Country, have expressed their consent to it". This consent "may be expressed by signature, ratification or accession" subject to the each country's internal legal requirements. Although 8 countries signed the agreement in 2009 (4 of which do not border the SCS), it is unclear how many have given their formal consent as required except for the host country, the Philippines...." (Footnote 5: The evaluation team requested information on which countries have met their requirement for formal consent, but PEMSEA did not provide this information.	We find these questions and the insinuation that PEMSEA and the National Governments of the EAS region are not capable or aware of the UN process in establishing an international agreement to be insensitive and reckless. In fact, this whole effort was headed by a Technical Working Group comprised of eminent lawyers and statesmen who were familiar with UN procedures for development and approval of international agreements. The approval process for each participating country was presented and discussed thoroughly during EAS Partnership Council and Executive Committee meetings and authorizations of full powers for the respective signatories were provided to PEMSEA, as required by national law, from the respective Foreign Affairs Departments. In other words, we followed the process to the full requirements of the UN and national legal systems. Finally, our available records do not indicate such information being requested by the Evaluation Office at any time.	The Evaluation Office is not making a statement on anyone's lack of capability and awareness. It is just stating that from the text it did not find it clear which of the countries that signed the agreement had met the conditions for the agreement to come into force. This information was a requested by Aaron Zazueta to Raphael Lotilla in an email on December 1, 2011. The reply by Mr. Lotilla did not sufficiently clarify the conditions. The explanation of the process followed prior to signature of the agreement which is now provided by PEMSEA provides sufficient evidence that the conditions were met, thus this text is not included in the final report of the evaluation.
30	Stephen Adrian Ross	PEMSEA	Chapter XI: Paragraph 38	From text "An important factor hampering the extent of political support to PEMSEA is the concern of some of the ASEAN countries that the Northeast Asian countries have too strong an influence on PEMSEA, which is reflected in the contributions that countries make to PEMSEA. The importance of striking the right balance to ensure country support is an issue that PEMSEA is well aware of, as it was expressed by the PEMSEA's Executive Committee Chair in his opening remarks at the PEMSEA's Ninth Executive Committee Meeting in October 2011."	This is an unsubstantiated and damaging statement that takes no account of the principal reason that PEMSEA was established as a regional partnership organization. The statement creates further damage by implying that influence over PEMSEA has been "bought" by China, Japan and RO Korea through their contributions to the UNDP Cost-Sharing Agreement, which was developed to assist the organization on its pathway to sustainability. It also suggests that the PEMSEA Executive Committee Chair agrees with this interpretation, and stated so during an Executive Committee meeting. The Evaluation Office needs to be more mindful of facts and context. The Haikou Partnership Agreement clearly states the role of PEMSEA from the perspective of the countries, as follows: "We consider partnership as an effective mechanism to facilitate concerted actions in our common endeavour to implement the SDS-SEA, as it gives due consideration to the initiatives, shared responsibilities, desired outcomes, mutually supportive roles and the need to address disparities in capacity among the concerned countries and other stakeholders, including national and local governments, international agencies, non-government organizations (NGOs), the private sector, academic and scientific institution, communities, financial institutions and donor agencies. In this context, we are committed to forging a long-term stakeholder partnership for the implementation of the SDS-SEA."	These concerns were communicated by country representatives to the EO. The EO understands the sensitivity and has made modifications to the text. However, the concern remains that the extent of country support to regional organizations is very relevant to the likelihood of progress towards impact of GEF support in the region.
31	Stephen Adrian Ross	PEMSEA	Chapter XI: Paragraph 38,		Failing to recognize the relevance of PEMSEA has apparently led the Evaluation Office to express serious concerns about the sustainability of PEMSEA as an international organization. In fact, it is the relevance of PEMSEA to the region, which provides the very momentum for broader and continued support for PEMSEA.	On the contrary, the evaluation maintains that support for a regional mechanism such as PEMSEA is relevant and important in ensuring that GEF support leads to progress towards impact. The evaluation points out to the GEF the financial risks of supporting the <u>expansion</u> of PEMSEA in the current regional and global context.
32	Stephen Adrian Ross	PEMSEA	Chapter XI: Paragraph 38,		Regarding the influences from the Northeast, the Evaluation Office is advised that PEMSEA adheres to UN rules of regulations regarding staffing, accounting, financial management and administration. We have undergone three mid-term and terminal evaluations, numerous external audits and one evaluation by the GEF Evaluation Office. No previous evaluation or audit has found or raised matters of inappropriate procedures that would suggest external "influences" at play.	The evaluation reported on perceived influences on the governance of PEMSEA, as communicated by country representatives, not on actual influences on the operations of PEMSEA. This was not a statement on PEMSEA's adherence to UN regulations but rather on the differences in extent of support by countries in the SCS. However, the evaluation found instances of financial management that merit further attention, and these will be pointed out to the appropriate authorities within the GEF system.
33	Stephen Adrian Ross	PEMSEA	Chapter XI: Paragraph 38,		The Evaluation Office should also be reminded that all PEMSEA Countries contribute to the operation of the organization, through in-cash and in-kind support, as partners. These data have not been reflected in paragraph 38 or the associated footnote, nor do they appear in Table 2. The annual contribution of the China, Japan and RO Korea totals approximately \$330,000, depending on the rate of exchange, as delineated in the Cost-Sharing Agreements with the UNDP. Timor Leste started contributing \$100,000 per year in 2010. In addition, the significant contribution provided by the Government of the Philippines, which constructed the PEMSEA Office Building in 2007 and provides the PEMSEA Resource Facility with free use of the amenities and all utilities, has not been included. This has been conservatively estimated to be \$42,000 per year. From these 5 countries, the total annual contribution is \$472,000 as of 2010.	As the PEMSEA financial reports were not clear on the annual contributions of the countries towards regional services, the EO had to estimate the amount based on the figures in the financial reports. The amounts in the final report have been changed to reflect the new information provided by PEMSEA. Estimated costs shouldered by the Philippines have been added in support to PRF operational costs. Timor Leste funds are earmarked and fall in another category, as stated by PEMSEA.
34	Stephen Adrian Ross	PEMSEA	Chapter XI: Paragraph 38,		However, there are other significant contributions not considered in the table. PEMSEA Countries take turns to host EAS Partnership Council meetings, EC meetings, the Triennial EAS Congress, etc. While these are voluntary contributions, they do in fact support significant operational costs of PEMSEA as a regional organization. A good example is the annual PNLG Forum, which local government members take turns to host. This translates into annual voluntary contribution of \$50,000 to \$100,000, depending on the location of the Forum. We are of the opinion that such voluntary contributions are far more significant, both in size and within the principal of partnerships, than an annual commitment of \$5,000 to \$30,000 being prescribed by some regional organizations.	Noted and acknowledged

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35	Stephen Adrian Ross	PEMSEA	Chapter XI: Paragraph 38,		We are unable to find the quote attributed to Dr. Chua during the 11th EC meeting in the published proceedings. In fact, Dr. Chua presented a message with a much different theme. He highlighted the various challenges that PEMSEA is facing, including the need to ensure PEMSEA's technical and financial sustainability; the complex situation in the region; the competition for funds; as well as the importance of engaging all the countries in the region, particularly Malaysia and Brunei, which are currently not Country Partners of PEMSEA.	Noted and the text has been revised
36	Stephen Adrian Ross	PEMSEA	Chapter XI: General comment		We mention this technical matter because it is a reflection of numerous misinterpretations by the Evaluation Office when describing the two streams (i.e., PEMSEA and SCS LME project) in the draft document. ICM is recognized and applied as a framework and process for improving governance. It is not a scientific process, but rather utilizes scientific input (e.g., vulnerability assessment of coastal resources and communities; natural and management threats to habitats/fisheries; climate change and extreme weather events) to strengthen governance and management decisions and programs. The draft document contains many suggestions concerning overlaps, lack of coordination, waste of resources, etc., when in fact ICM and the scientific process of other projects are complementary.	The evaluation addresses the areas of complementarity and the areas of divergence in Sections 6.2 and 7.1 of the final report.
37	Stephen Adrian Ross	PEMSEA	Chapter XI: Paragraph 10 - Paragraph 11 (between)	From text "Mainstreaming and scaling-up are most successful in areas that have the same characteristics as those in the demonstration site, most notably economic and governance capacities. In addition, mainstreaming works best where administrative and geographical boundaries match those of the problem being addressed."	In addition we emphasize that, based on PEMSEA's experience, the mainstreaming and scaling up ICM are not dependent on sites with the same characteristics as the demonstration site, most notably sites with robust economic conditions and governance capacities. If that were the case, the ICM programs in the developed world would all be highly successful. Under the PEMSEA program, ICM has been scaled up in the EAS region from 6 national ICM demonstration sites to 31 ICM demonstration and parallel sites covering a little more than 11 percent of the region's coastline. The 26 parallel sites have utilized their own resources and/or support from the national government, the corporate sector and other stakeholders, to develop and implement ICM. These sites cover various political, social, cultural, economic and environmental situations. PEMSEA provides parallel sites with ICM and specialized trainings and technical support to advance them through the process. This is not to say that all ICM programs move at the same pace or achieve their targets in a consistent timeframe. Available resources and local capacities affect these variables. For this reason, PEMSEA is now focused on scaling up support mechanisms at the regional and national levels to be able to address the demands from local governments for ICM training and support, with the objective of achieving ICM coverage of 20% of the region's coastline by the end of 2015.	The evaluation is assessing under what conditions broader adoption has taken place in the cases of countries that were visited, as this is the evidence that the EO has. The finding has been slightly modified to "Mainstreaming and scaling-up are most successful in areas that have the <i>receptive capacities</i> as those in the demonstration site, most notably economic and governance capacities. In addition, mainstreaming works best where administrative and geographical boundaries match those of the problem being addressed."
38	Stephen Adrian Ross	PEMSEA	Chapter XI: Paragraph 40	From text: "...PEMSEA signed contracts with several municipalities in the region when it did not have a legal personality, and when UNOPS was the executing agency....Similarly, in its contracts, PEMSEA stipulated that any equipment purchased with the funds provided by the grant remained the property of PEMSEA. This is contrary to the spirit of GEF grants, as GEF support is intended for the countries, not for the sustainability of the project management unit."	The first part of this statement is incorrect. UNOPS became Executing Agency of PEMSEA in 2008. Under the UNOPS procurement rules and regulations, all contracts issued by PEMSEA utilize the UNOPS approved format and legal content. Up to a certain level of expenditure (i.e., \$50,000), PEMSEA (i.e., the Regional Programme Director (RPD) of the GEF/UNDP/UNOPS project) was allowed to sign the contract "on behalf of UNOPS". Over that level of expenditure, authorization was required from UNOPS for the RPD to sign on behalf of UNOPS. In 2012, the UNOPS rules changed. UNOPS now signs all contracts.	The time period for the contracts in question are relevant to IMO procurement rules, not UNOPS. This paragraph has been taken out of the final report and will be pointed out separately to the appropriate authorities within the GEF system.
39	Stephen Adrian Ross	PEMSEA	Chapter XI: Paragraph 40	From text "...PEMSEA signed contracts with several municipalities in the region when it did not have a legal personality, and when UNOPS was the executing agency....Similarly, in its contracts, PEMSEA stipulated that any equipment purchased with the funds provided by the grant remained the property of PEMSEA. This is contrary to the spirit of GEF grants, as GEF support is intended for the countries, not for the sustainability of the project management unit."	The second part of the statement concerning equipment is standard clause in the UNOPS contract. Its intention is not to facilitate the sustainability of the project management unit. Its purpose is to ensure that purchased equipment remains on the site and is used for the intended project. Once the project is over, standard procedure is that all remaining equipment is turned over to the site. PEMSEA has never removed a single piece equipment from a project site for use in the office.	The contracts do not indicate that the equipment would be turned over to the country at project end, nor was there documentary evidence presented to the EO that the equipment was donated or turned over to the local governments. This paragraph has been taken out of the final report and will be pointed out separately to the appropriate authorities within the GEF system.
40	Stephen Adrian Ross	PEMSEA	General Comment		We also feel that, given the importance of this document to the future of GEF investments in the region, there needs to be further interaction and collaboration among concerned countries and stakeholders on this report, rather than a piecemeal approach. To this end, we will be disseminating our comments on the draft report to all concerned countries, the PEMSEA Executive Committee and other partners in order to inform them of our concerns and the potential implications.	Stakeholder engagement in this evaluation took place early in the process through the reference group's inputs and comments on the evaluation approach paper, support in providing information sources to the evaluation, and comments on the preliminary findings. The draft of the report was simultaneously circulated to the relevant stakeholders, including country representatives and participants of the reference group, who have thus had the opportunity to comment. The final unedited report is available to the public on the website.
41	Stephen Adrian Ross	PEMSEA	Paragraph 130	From text "On the other hand, intergovernmental organizations with primarily environmental management aims such as MRC, COBSEA or PEMSEA currently rely heavily on donor funding, and do not have sustainable levels of funding commitments from member countries. The implications of this are explored in Chapter XX on factors affecting broader adoption. The MRC, with a wider mandate addressing broader development issues rather than just environmental management, has managed to attract a large number of donors and partners for its projects."	The Sustainable Development Strategy for the Seas of East Asia is the strategy and program framework adopted by PEMSEA countries. It is not an environmental management program per se; it is a program focused on sustainable development of marine and coastal resources at the regional, national and local levels. For example, the Changwon Declaration, which was signed by PEMSEA countries in July 2012, states, "We regard the SDS-SEA as an appropriate as platform and framework for overcoming the challenges to sustainable development and for building an ocean-based blue economy in the region." This is the essence of the SDSSEA.	Noted. "Environmental" has been changed to "sustainable development" wherever relevant.
42	Stephen Adrian Ross	PEMSEA	Paragraph 130	From text "On the other hand, intergovernmental organizations with primarily environmental management aims such as MRC, COBSEA or PEMSEA currently rely heavily on donor funding, and do not have sustainable levels of funding commitments from member countries. The implications of this are explored in Chapter XX on factors affecting broader adoption. The MRC, with a wider mandate addressing broader development issues rather than just environmental management, has managed to attract a large number of donors and partners for its projects."	PEMSEA started as a GEF project, and was recognized as an international organization with a legal personality in December 2009. PEMSEA countries subsequently agreed to a Financial Sustainability Plan (2011), with the objective of achieving financial sustainability by the end of 2013. The Plan was initiated in 2012 with the Executive Director and secretariat staff supported via country contributions. The PEMSEA Office continues to be hosted and funded by the Government of the Philippines; a host country agreement has been approved by the Philippines Department of Foreign Affairs, and is being provided to the Office of the President for ratification. PEMSEA technical staff continue to be Supported via projects and services; at present GEF is a main source of funding but other sources are being developed in accordance with the approved Financial Sustainability Plan.	Noted and additional information included
43	Stephen Adrian Ross	PEMSEA	Paragraph 139		Such strong statements must be substantiated by at least one or two good case studies. Where does the GEF Evaluation Office see this happening in the SCS context? Without facts and figures to back up these statements, they are pure speculation, and bring the integrity of the report and the credibility of the GEF Evaluation Office into question.	Text clarified to indicate that the funding choices of donors influence what activities are implemented, and which ones remain unimplemented

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44	Stephen Adrian Ross	PEMSEA	Chapter VI: Box 1	Box 1 title "Regional planning instruments and GEF's role in implementation"	The substance of the text in Box 1 does not live up to the title. The approaches used by both the SCS LME project and PEMSEA entailed demonstration/partnership building and implementation initiatives, which then facilitated the formulation of the SCS SAP and the SDS-SEA respectively. The strategies were based on the foundational experiences facilitated by GEF. This was seen as a very positive and innovative approach in the region.	The intention of the box is to indicate that GEF support in the region has complemented and enabled the implementation of activities previously identified by regional instruments that had not been funded. The text has been modified to make this more explicit.
45	Stephen Adrian Ross	PEMSEA	Chapter VI: Table 6, Page 48	From text "More than 1,000 participants from the region trained through internships, workshops and conferences on ICM, risk assessment, oil spill response, environmental monitoring, sustainable management of habitats, fisheries refugia, and economic valuation"	The number of identified participants is low. The TE report for phase 2 of PEMSEA identifies 1,667 participants since 1994. From 2008-2010, PEMSEA ran 22 training courses, with a total of 638 participants. The number of participants attending EAS Congresses has been 3,900. We would therefore suggest that this sentence be changed to, "More than "5,000" participants from the region..."	The number was based on the only definite count provided by PEMSEA of people trained in its reports (396 Terminal Report). The number has now been modified, but does not include the number of participants in the EAS Congress, as this event is intended primarily for information-sharing, not skills-building.
46	Stephen Adrian Ross	PEMSEA	Chapter VI: Table 6, Page 49	From text "PEMSEA as a legal personality independent from the GEF project Coordination Center for Oil Spill Response in Gulf of Thailand"	Haikou Partnership Agreement and Partnership Operating Arrangements on the Implementation of the Sustainable Development Strategy for the Seas of East Asia (2006); Agreement Recognizing the International Legal Personality of PEMSEA (2009); Manila Declaration on Strengthening the Implementation of ICM for Sustainable Development and Climate Change Adaptation in the Seas of East Asia Region (2009); Changwon Declaration Toward an Oceanbased Blue Economy: Moving Ahead with the SDS-SEA (2012); Agreement between the Government of the Philippines and PEMSEA establishing the PEMSEA Resource Facility Center (2012)	Noted and included in the text
47	Stephen Adrian Ross	PEMSEA	Chapter VI: Table 6, Page 49	Decision Support Frameworks (MRC and LWM projects)	Guidebook on the State of the Coasts Reporting	Noted
48	Stephen Adrian Ross	PEMSEA	Chapter VI: Paragraph 146	From text "In terms of regional cooperation, two important accomplishments made possible through the UNDP/PEMSEA stream are the Gulf of Thailand (GOT) Joint Statement and Framework Programme for Joint Oil Spill Preparedness and Response and the Port Safety, Health and Environmental Management System (PSHEMS) Code, both of which are discussed later."	In addition 4 intergovernmental agreements have been signed under the PEMSEA program, including the Agreement recognizing PEMSEA's legal personality as an international organization (2009)	Noted and included in the text
49	Stephen Adrian Ross	PEMSEA	Chapter VI: Paragraph 150	From text: "The 11 PEMSEA country partners currently include eight GEF-eligible (Cambodia, China, DPR Korea, Indonesia, Lao PDR, Philippines, Timor Leste and Vietnam) and three non-eligible countries (RO Korea, Japan and Singapore)."	DPR Korea only received GEF assistance during the first phase of PEMSEA, from 1994-1999.	Noted and included as a footnote
50	Stephen Adrian Ross	PEMSEA	Chapter VI: Paragraph 168	From text "The third instance of multi-state cooperation that is more significant, but perhaps less visible, is the engagement of China and the coastal ASEAN countries in the elaboration of the SCS Strategic Action Programme (SAP). While China has been keen in keeping good relationships with its ASEAN neighbors, it has also held in high priority its maritime claims over the SCS."	Based on such rationale, the GEF Evaluation Office should also consider the Putrajaya Declaration, the Haikou Partnership Agreement, the Manila Declaration and the recently signed Changwon Declaration as important milestones in cooperation among countries of the region to address transboundary issues.	The final report further clarifies the type of coordinated intergovernmental responses and transboundary dimensions that it is referring to in this section.
51	Stephen Adrian Ross	PEMSEA	Chapter VI: Paragraph 185 and 186		Paragraphs 185 and 186 confuse the distinction between PEMSEA and SCS-LME regional projects, and COBSEA and PEMSEA. The SCS-LME regional project was a 5-year undertaking, not 20 years. And as stated previously in this document (para 181) the SCS-LME project had minimal linkages with COBSEA. On the other hand PEMSEA coordinated with both, although at the time the distinction between the two was not so evident. For example in 2006, a joint initiative with COBSEA included a workshop on partnership opportunities at the UNEP GPA IGR meeting in Beijing; the preparation of a joint policy brief entitled, Partnership Opportunities for Enhancing GPA implementation in the East Asia Seas Region (2007-2011); further collaboration included technical input to COBSEA projects on marine spatial planning and coastal erosion; participation/co-convening of EAS Congresses, co-organization of the GEF Stocktaking meeting in 2010, etc.	Noted and text further clarified
52	Stephen Adrian Ross	PEMSEA	Chapter VI: Paragraph 185	From text "The implications are that in over nearly 20 years, inefficiencies caused by duplications in activities between these two complementary initiatives likely run in the millions, much of it paid by GEF grants, countries and its cofinancing partners"	This statement is very destructive, yet it contains no basis. It must be founded on fact and not on speculation...the two projects focused on different issues and, for the most part, different sites. When there was a common site, there was agreement on the focus of each project. For example, the Gulf of Thailand was a common site, where PEMSEA focused on sea-based sources of marine pollution and ICM demonstration; SCS-LME focused on habitats and fisheries. This was not duplication and a waste of funds. The countries and stakeholders benefited, and continue to benefit from these projects, as evidenced by the Joint Statement on oil spill preparedness and response that the three littoral countries continue to implement. We suggest that this remark be reviewed and substantiated with facts and figures, or deleted.	Noted and point clarified in Section 7.1 of the final report. The specific sentence has been removed.
53	Stephen Adrian Ross	PEMSEA	Chapter VI: Paragraph 186	From text " Over time, overlaps developed among these two streams also in terms of concerns addressed"	The second phase of PEMSEA was tasked with development of a leading a major paradigm shift in concept, approach and methodologies for addressing environmental and sustainable development problems in the coastal and marine areas of the region. The project document was developed in 1997 and start-up was 1999. Therefore, to say that PEMSEA is moving into habitat management is inconsistent with the history of PEMSEA's development and GEF support. Beginning in 1999, PEMSEA moved from a marine pollution focus into a sustainable development program, including habitat restoration and management.	Noted and point clarified in Section 7.1 of the final report. The specific sentence has been removed.
54	Stephen Adrian Ross	PEMSEA	Chapter VI: Paragraph 186	From text "Since the SDS-SEA project (GEF ID 2700), PEMSEA has been seeking to incorporate ecosystem management into its approach	ICM is an integrated approach that operationalizes ecosystem-based management.	Noted and the sentence has been removed
55	Stephen Adrian Ross	PEMSEA	Chapter VI: Paragraph 186	From text "On the other hand, a program for the integrated implementation of the SDSSEA and the Yellow Sea SAP is up for approval by the GEF Council in November 2012. The UNDP implemented YSLME TDA-SAP project (GEF ID 790) is a member of the PEMSEA EAS Partnership Council, and has better coordination with the UNDP/PEMSEA funding stream"	Some very relevant information is missing from this discussion, namely the GEF stocktaking meeting, which took place in October 2010. (In fact it is recalled that two members of the GEF EO team attended that meeting). The meeting was organized by GEF Sec and the implementing agencies, as well as COBSEA and PEMSEA, and involved all participating countries of the various GEF-supported projects across the EAS region, as well as the respective project management offices. The meeting discussed these same concerns, and came forward with several important conclusions and recommendations which have a major impact on the so-called "streams" that are being described in this document. The meeting report is available from the implementing agencies, and is on PEMSEA's website.	Noted and reference to the stocktaking meeting has been included

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56	Stephen Adrian Ross	PEMSEA	Chapter VI: Paragraph 187	From text "Business cycles, business needs and country counterparts for the World Bank and PEMSEA are different. PEMSEA works at the municipal level and seeks to draw funding to implement ICM activities among its constituent municipalities."	There are very few situations where local governments can raise funding on their own for environmental infrastructure; Metro- Manila and other large urban centers are the exceptions. In most cases, municipal governments need national government support or approval to access loans. That is the reason why the WB/PEMSEA strategic partnership is relevant. PEMSEA is able to create the political will and public support for environmental infrastructure projects through ICM. World Bank is able to facilitate the investments by including the projects in country programs. The working relationship has evolved since 2008, and there has been good collaboration between the two organizations during project development and planning phases over the past couple of years, including the development of the GEF/WB PFD on Scaling Up Partnership Investments for Sustainable Development of the Large Marine Ecosystems of East Asia and their Coasts in 2011.	Noted and discussion expanded
57	Stephen Adrian Ross	PEMSEA	Chapter VI: Paragraph 188	From text "Each stream has also developed different constituencies and support structures in the country, some of which do not always work in the same direction. While one stream would establish its working relationships with one ministry, the other stream has on occasion established working relationships with another ministry that might have a jurisdictional overlap with the first. This has resulted in situations in which a particular national agency supports projects of the stream that they are affiliated with, but will oppose projects proposed by the other stream (Chen 2005). This was partly a result of the different thematic issues that were addressed by each stream, but poor communication, coordination and insufficient support among the streams has contributed to making it a factor that has affected GEF performance and potential for impact."	Such statements should be based on factual information, provided in the report. How can one validate if these statements are correct or not if there is not substantial information.	A reference, Chen 2005, was cited as the source of information
58	Stephen Adrian Ross	PEMSEA	Chapter VI: Paragraph 190	From text "In summary, GEF support has contributed to increased communication among the various regional organizations, and has contributed to cooperative engagements among countries. The three main streams of funding financed under the international waters focal area have also resulted in robust initiatives, all of which have made important contributions to the solution of transboundary environmental concerns. But these initiatives worked in isolation with one another, were rarely coordinated, and on occasion have competed with one another."	Where are the facts to support this statement? This and similar statements should be substantiated or deleted.	Communicated during interviews. Examples added in Section 7.1, and text in Section 7.3 modified
59	Stephen Adrian Ross	PEMSEA	Chapter VI: Paragraph 191	From text "Country priorities have also been a major factor underlying which kinds of transboundary environmental responses may be supported by GEF projects. Early events contributed to paths that over time resulted in increasingly divergent and also in some ways overlapping initiatives. With the increasing demand for GEF IW funds and the limited resources available, GEF-supported initiatives now compete for the resources that GEF is able or willing to allocate to the SCS."	The GEF Stocktaking in October 2010 provided conclusions and recommendations regarding a programmatic approach. To be fair to GEF and the Implementing Agencies, as well as the participating countries, this report could at least recognize that efforts are being made to overcome the coordination issue.	Noted and reference to the stocktaking meeting has been included
60	Stephen Adrian Ross	PEMSEA	Chapter VI: Paragraph 192	From text "These evidence indicates that it may be the time to review the paths the GEF partnership has been following in the region for the repositioning of GEF support."	Where is the evidence...only statements. Perhaps you can include evidence. Again, how did the GEF Stocktaking address this issue?.	Discussion clarified further. The specific sentence has been deleted.
61	Stephen Adrian Ross	PEMSEA	Chapter VIII: Paragraph 220	From text "The approach followed by the projects of the UNDP/PEMSEA stream for strengthening institutional capacities has been quite similar to that followed by the UNEP/SCS stream."	It would be worth to note that in all cases, the multistakeholder committees established under the ICM programs have been sustained by the local governments. In addition, one could mention that while GEF supported the development of 6 national ICM demonstration sites, 27 ICM parallel sites have replicated the ICM model in the respective countries. GEF has not supported these sites per se, but has provided training opportunities for local governments through PEMSEA. These investments are not recognized as GEF co-financing for the most part, but are the investments of local government in sustainable development.	Noted and additional information included
62	Stephen Adrian Ross	PEMSEA	Paragraph 246	From text "On the other hand, sites dealing with land-based pollution generally resulted in stress reduction, as these demonstrations directly introduced technologies at points where pollution was being produced. Changes in over-all pollution levels of the water bodies being targeted, however, are unknown. In Manila Bay, for example, which used the ICM approach among government agencies at different scales, and in Chonburi in Thailand, water quality continues to be a concern because the pollution sources are located far beyond the coastal area. In addition to facilitating coordination among local agencies, appropriate technologies need to be introduced at a wider scale to reverse this deterioration."	The situation in both locations is quite complex. Manila Bay has a watershed area of 18000 km2 and a population in excess of 25 million. ICM is being applied in the Bay. It started with coastal provinces, and is now being scaled up to river basins and non-coastal provinces. The current focus is the major pollutant source to the Bay, namely the Laguna Lake/Pasig River watershed, and the application of a TAPL approach to determine how to maximize available investment in the recovery of the Bay, in collaboration with the World Bank, government agencies and private sector. It should also be noted that Chonburi is influenced by pollutant inputs from other areas. Except for small canals and streams, there is no major river traversing Chonburi Province. The province, however, receives freshwater inputs from Bang Pakong River (17,000 km2 watershed area), which originates in Prachinburi Province and empties into the Gulf of Thailand in the n+G61 or the Eastern tip of the Bay of Bangkok. The coastline of Chonburi starts from the estuary of Bang Pa kong River in the north. Hence, coastal water quality especially in the northern coast of Chonburi Province is unavoidably influenced by discharges from Bang Pakong River.	Additional information included in text: "In Manila Bay and in Chonburi, for example, which have both used the ICM approach among government agencies at different scales, water quality continues to be a concern because the pollution sources are located far beyond the coastal area. Manila Bay has a watershed area of 18,000 km2 and a population of more than 25 million. Chonburi, while having no major rivers in the province, receives freshwater inputs from Bang Pakong River that has a watershed area of 17,000 km2. In addition to facilitating coordination among local agencies, appropriate technologies need to be introduced at a wider scale to reverse this deterioration. For example, in Manila Bay, the focus of intervention is on the Laguna Lake/ Pasig River watershed, which is a major source of pollution to the bay."

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63	Stephen Adrian Ross	PEMSEA	Paragraph 255	From text "In Chonburi, Thailand, mangrove area was being converted for other uses including agriculture and shrimp aquaculture. As a result, since the 1970s, mangrove area declined considerably. Starting from 1999, within the framework of integrated coastal management (ICM), GEF has supported re-plantation of locally prevalent mangrove species in a total of 49 ha in five sites that were protected by the municipality. Analysis of remote sensing images for the site indicates a marginal increase of 4 ha from 1999 to 2009. A field visit in September 2011 showed that a large part of the replanted area had died off, which may explain the large discrepancy between what was planted and what was detected through remote sensing."	There were other causes for the decrease in mangrove areas in Chonburi including land reclamation, construction of port and industrial complexes, and other development activities arising from the Eastern Seaboard Development Project, which aimed to develop provinces in the eastern seaboard of the country into industrial centers to support and facilitate international trade, investment and exports of the country. PEMSEA supported 2 mangrove planting projects in Muang Chonburi Municipality (one of the municipalities in Chonburi Province) on Sept. 2006 and Sept. 2007. These activities primarily aimed to educate and mobilize communities and students on mangrove conservation and rehabilitation, and consisted of a 1-day workshop and 1-day mangrove planting. - In 2006, 235 persons from 10 communities and 5 municipal schools attended the workshop and were involved in developing a 5-year Plan for mangrove rehabilitation, and planted an area covering 5 rais (0.8 hectares). Based on the Plan, mangrove reforestation through wide public participation will be undertaken yearly to rehabilitate mangrove areas. The project cost THB 100,000 (approx. \$2,600) - In 2007, 246 people consisting of community leaders, students, teachers and personnel in Muang Chonburi Municipality attended the workshop and planted 1,000 mangrove Seedlings. The project, which also supported the publication of a handbook on mangrove conservation for distribution to local schools, cost 200,000 Baht or approximately \$5,000 A project on mangrove reforestation was supported under the PEMSEA-SGP partnership, as one of three components of the Project on Marine Resource Conservation, Habitat Rehabilitation and Waste Management, implemented on July 2007 to July 2009 (the other components focused on crab conservation and community-based waste management).	Text changed to include reference to "land reclamation for port and industrial complexes"
64	Stephen Adrian Ross	PEMSEA	Paragraph 291	From text "Only two of the visited sites, Danang (Vietnam) and Manila Bay (Philippines), did not show evidence of pollution reduction even after having implemented demonstrations for more than a decade. Both used ICM approaches. In the case of Danang, no monitoring data was made available to determine changes in water quality. In the case of Manila Bay, which has experienced hypoxic episodes since 1980, larger-scale drivers such as economic and population growth in the megacity draining into the bay are factors beyond the scope of the demonstration. Pollution therefore continues to increase in Manila Bay."	This statement needs to be reviewed. In both cases, there has been significant investment in pollution reduction facilities. Annexes to this report indicate the major investments in Manila Bay region, as part of the investment fund; in Danang, major investments have been supported by the World Bank, the Australian government, the national government and Danang City government in both domestic and industrial wastewater facilities. This paragraph confuses the distinction between pollution reduction and improvement in water quality. In the case of Manila Bay for example, there has been significant investment in pollution reduction, but the question is the ecosystem response to such reductions. How much reduction is required and long will it take to see the effects?	Given additional information from the Philippines, text modified to: In Manila Bay, coliform levels have greatly decreased at some monitoring stations, increased in others, but remain high. BOD levels continue to increase. This site has experienced hypoxic episodes since 1980, and continues to be subjected to larger-scale drivers such as economic and population growth in the megacity draining into the bay—factors that are beyond the scope of the demonstration. However, the national government is currently making significant investments in cooperation with the private sector and development agencies towards reducing pollution levels and improving water quality to a level mandated by the Supreme Court of the Philippines. One form of investment is through the construction of wastewater treatment plants by 2016. In the case of Danang, although the city received national and regional awards in 2011 for its commendable environmental management practices, no monitoring or evaluation data was made available to the Evaluation Team to enable the assessment of changes in water quality."
65	Stephen Adrian Ross	PEMSEA	Paragraph 291	From text "Both used ICM approaches. In the case of Danang, no monitoring data was made available to determine changes in water quality"	The establishment of the IEMP is one of the major contributions of the ICM program in Danang. Under the IEMP, the following parameters are being monitored: > Coastal water: COD, NH4 +, heavy metal; oil and microorganism (Coliform) > Danang Bay water: SS, Oil, N-NH4+, Coliform, CN, Hg, Pb, Fe, Phenol > River water: SS, NO2 -, NH4 +, Coliform. > Lake water: BOD5, COD, NH4+ +, NO3 -, oil and microorganism > Underground water: SS, NO3 -, Coliform, Pb, Fe, hardness, NH4 Results from the IEMP provide the necessary information for the development and strengthening of plans and programs on environmental protection including the passing of decisions by the People's Committee to support their implementation: Decision No. 34/2008/QĐ-UBND dated 13th June 2008 of the People's Committee of Danang City to promulgate the regulation on coordination among agencies involved in monitoring and analysis of environmental quality, management, use of and sharing of information on environmental quality monitoring in Da Nang; Decision No. 41/2008/QĐ-UBND dated 21st August 2008 of the People's Committee of Danang City approving the project "Development of Da Nang into an Environmental City" A part of the effort of the city to address the pollution problem, the city has invested on equipment and How was this determined? Where is the data supporting this statement?	Although the IEMP may have been adopted in Danag, stress reduction data was not made available to the Evaluation Office during the field visit, through PEMSEA staff, or on the PEMSEA website.
66	Stephen Adrian Ross	PEMSEA	Paragraph 291	From text "Pollution therefore continues to increase in Manila Bay."	A part of the effort of the city to address the pollution problem, the city has invested on equipment and How was this determined? Where is the data supporting this statement?	The paragraph has been modified and the specific sentence removed. See response above on same paragraph.
67	Stephen Adrian Ross	PEMSEA	Data Collection: Paragraph 1 (formerly paragraph 294)	From text "GEF support for M & E initiatives contributing to data collection has taken on different forms through the three different funding streams. The UNDP/PEMSEA stream supported the development of Integrated Environmental Monitoring Plans (IEMPs) in Xiamen, Batangas Bay, Chonburi, Sihanoukville, Manila Bay and Danang, as well as other sites outside of the SCS."	IEMP was not established in Chonburi as it was not considered an immediate priority of the participating local governments at that time, perhaps since water quality monitoring was being conducted by the Pollution Control Department, Regional Environment Office, and universities. PEMSEA works with the local governments on the basis of identified priorities and needs and mutual agreement. However, IEMP establishment is continuously being promoted in Chonburi as part of the establishment of an ICM Learning Network in the province during this current phase.	Noted

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68	Stephen Adrian Ross	PEMSEA	Paragraph 311	from text "Part of the IIMS establishment process is the development of sustainability plans by the user agencies, but no evidence has been seen of the implementation of these plans. Information provided by PEMSEA in May 2012 on the status of IIMS implementation shows that trained staff leaving either due to personal and/or administrative reasons is a factor in 3 of the 5 ICM sites in the SCS that has led to IIMS use not being sustained."	While challenges are encountered in the operationalization and maintenance of the IIMS, DENR continues to recognize and facilitate its use by expanding the areas for the application of the system: >MOA between DENR/Protected Areas and Wildlife Bureau and PEMSEA on the establishment of IIMS in the ICRMP sites consisting of 7 provinces from 5 regions; training conducted in April 13-15 2011. > DENR/River Basin Control Office will start the River Basin and Coastal Area Data Integration for 18 priority river basins using IIMS in support of Resolution No. 2012-001, which was approved by the Cabinet Cluster on Climate Change Adaptation and Mitigation to address the issues of flooding and other related hazards in 18 priority river basins and have formally requested PEMSEA support for training and technical guidance, in a letter from the DENR Undersecretary responsible for the program.	In light of the information provided, it has been included in the text
69	Stephen Adrian Ross	PEMSEA	Paragraph 311	from text "Part of the IIMS establishment process is the development of sustainability plans by the user agencies, but no evidence has been seen of the implementation of these plans. Information provided by PEMSEA in May 2012 on the status of IIMS implementation shows that trained staff leaving either due to personal and/or administrative reasons is a factor in 3 of the 5 ICM sites in the SCS that has led to IIMS use not being sustained."	This situation is not unique to IIMS. Training of staff is a continuing process and an essential component of ICM development, implementation and sustainability. The current limitation, not only for IIMS, is the lack of national programs/capacities to meet the training demands. That is the rationale behind PEMSEA's ICM Learning Centers, National and Regional Task Forces and development of national capacity development strategies and programs.	Noted
70	Stephen Adrian Ross	PEMSEA	Paragraph 312	From text "The Manila Bay IIMS covers three administrative regions that are part of the bay, serviced by multiple national government agencies involved in environmental monitoring, and provincial governments such as Bataan and Cavite. The function of linking multiple agencies and sites through a web-based system was first tested here, but no evidence was found to show further progress in this direction in other sites or at the regional level, as intended."	An integration workshop for the Manila Bay IIMS was held on 22-24 August 2012 to integrate the databases of the 3 regions (Site Management Offices) and 2 provinces in addition to the old Manila Bay database from 2002-2007. Unique record numbers (geocode) were assigned to facilitate the establishment of a unified Manila Bay IIMS. The work continues, in order to comply with the order by the Supreme Court of the Philippines.	In light of the information provided, it has been included in the text
71	Stephen Adrian Ross	PEMSEA	Paragraph 313	From text "In Danang, information from PEMSEA states that the IIMS is being updated quarterly, and that ICM staff are now also training other sites in the use of IIMS. A site visit in June 2011 did not show evidence of use beyond 2005, however."	An IIMS/SOC Training was held in Danang on 9-14 June 2011 (at the same time as the site visit by the GEF EO evaluator), which was attended by 22 participants, thirteen of which were from the seven priority provinces identified for ICM scaling up and nine from VASI. Danang PMO staff served as trainers and used the Danang database to demonstrate the application of IIMS	In light of the information provided, it has been included in the text
72	Stephen Adrian Ross	PEMSEA	Paragraph 314	From text "In May 2012, PEMSEA reported to the Evaluation Office that there were no problems with the implementation of the IIMS"	We are unable to find our statement in our May 2012 response to the Evaluation Office suggesting that there was no problem with IIMS. In fact we were very straight forward in explaining the situation. Please consider revising or deleting this statement.	In a PEMSEA reply (May 2012) to a GEF EO inquiry on specific questions referring to IIMS as a technological package, PEMSEA responded "nil" on all accounts, citing as an explanation only the lack of direction and ownership in the use of IIMS in Manila Bay when the demonstration there ended. This only acknowledges problems with implementation of the technology and the inherent problems of persuading governments commit to the information technologies introduced by the program, but not problems with IIMS itself as a technological package that may not be suited to local conditions.
73	Stephen Adrian Ross	PEMSEA	Paragraph 314	From text "Nevertheless, the available evidence indicates after nearly 15 years since PEMSEA first tested the IIMS prototype in the Malacca Straits,"	The Straits of Malacca Environmental Information System (SMEIS) was developed specifically for the Malacca Straits. It was NOT the prototype for the IIMS, as it was GIS-based for inclusion in the Marine Electronic Highway e-mapping project, which was transferred to IMO and funded by GEF/World Bank. However, it would be fair to say that the experience in Malacca Straits led to the idea of developing a database/decision-support tool for use by local governments in ICM development and implementation. The idea was conceptualized and included in the second phase of PEMSEA.	The text has been clarified: "Nevertheless, the available evidence indicates after nearly 15 years since the UNDP/PEMSEA stream first explored the idea of a decision support and information management system in the Malacca Straits ..."
74	Stephen Adrian Ross	PEMSEA	Paragraph 314	From text "there has been extremely limited adoption of IIMS despite nearly 3mil USD of GEF support to this technology"	We are unable to determine how this number was derived, which represents more than 10 percent of the project budget for phase 1 and phase 2 of the PEMSEA program. It is an inflated and unrealistic number. Our records indicate the cost of SMEIS and IIMS development, training and hardware from 1994-2007 was of the order of \$600,000. The current phase of PEMSEA is focused on the application of IIMS, primarily development of SOC reports at ICM sites. The "extremely limited adoption" is the evaluator's Perspective and knowledge of what's happening on-the-ground in the region. We have provided responses to this issue in May 2012, and in the comments above, for further consideration.	These numbers were based on the GEF ID 396 Terminal Report (p. 124), GEF ID 597 project document (p. 17), and GEF ID 2700 project document (p. 70)
75	Stephen Adrian Ross	PEMSEA	Paragraph 315	From text "Given that the IIMS has been used mostly for compiling data, less technically complicated solutions such as what Sihanoukville has done, may be the most appropriate until local human and especially financial capacities are increased"	Integrated management entails data collation and analysis from multi-sectors, and over time and space. Even if the tool is only used for compiling data and linking it to GIS, it serves a valuable purpose. Otherwise, it is PEMSEA's experience that these data are left in paper files, and are scattered across offices, labs and agencies. The SOC reporting system uses these data. It is a modest but useful start to applying monitoring data to inform decision-makers of trends, and eventually forecasting change as a consequence of interventions. We do not disagree that Excel files can be used to store data. However, it is the analysis and application of data in a decision support system that the IIMS is trying to bridge. We are making headway, and will continue to work with national and local governments and the PNLG to address the capacity constraints.	The EO does not call attention to the relevance of the functions of these technologies, but rather to the appropriateness of the specific technological packages to the local context. The specific sentence is addressed and clarified in the recommendations.
76	Stephen Adrian Ross	PEMSEA	Paragraph 322	From text "About USD 531, 043 of GEF support has been allocated for the development and establishment of the SOC reporting system (GEF ID 2700) based on project documents, with at least USD 67,500 spent on ICM sites in the SCS for training, technical support, publication (including translation) as of May 2012, according to information provided by PEMSEA (see Annex 10A - Table 40)."	We are unable to determine the specific source of this information. The approved UNDP ProDoc indicates a total commitment of US\$262,000 in consultancy services in support of SOC development and implementation for the EAS region.	Conservatively estimated figure of USD 400,000 based on local and international consultant fees in GEF ID 2700 project document, p. 67
77	Stephen Adrian Ross	PEMSEA	Paragraph 333	From text "Only SOC drafts for Chonburi and Sihanoukville and a published report for Guimaras have been obtained by the GEF EO as of August 12, 2012."	SOC reports prepared and disseminated during the EAS Congress included: Sihanoukville (Cambodia); Xiamen and Dongying (China); Sedong (Lao PDR); Batangas and Guimaras (Philippines); Chonburi (Thailand); Liquica and Manatutu (Timor Leste); and Danang (Vietnam). Bali (Indonesia) was unable to finalize/approve its draft SOC in time for the Congress	Information included in the text. The EO still has not been given access to these reports either by PEMSEA staff or through the PEMSEA website as of October 2012.

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78	Stephen Adrian Ross	PEMSEA	Paragraph 334	From text "Once the local governments have agreed to adopting the system, in many cases they do not have the capacity to implement it, requiring PEMSEA to provide a high level of technical and financial support."	Please refer to para 321 above, which confirms PNLG adoption of the SOC and targeting 100% coverage of ICM sites by 2015. The fact that some local governments cannot address the 36 core indicators when completing the baseline SOC is very telling and useful. It means that decisions need to be made to collect at least these basic data in order to provide management with information on trends, changes and progress, progress and impacts of ICM programs. The PNLG has recognized the value of such a system, and have agreed to make the commitment.	Noted
79	Stephen Adrian Ross	PEMSEA	Paragraph 334	From text "Once the local governments have agreed to adopting the system, in many cases they do not have the capacity to implement it, requiring PEMSEA to provide a high level of technical and financial support. While the SOC is a useful tool that promotes the interaction of different government agencies and information-sharing, slow adoption may also be a result of too many indicators needing to be populated, adding to the workload of government staff, compounded by the lack of available data."	PEMSEA provides training and technical advice to local governments implementing the SOC for the first time. A training package has been developed and transferred to ICM Learning Centers. This type of support is consistent with efforts to build the governance and management capacity of local governments implementing ICM programs, and is not an exception to other tools and instruments provided under the program.	Noted
80	Stephen Adrian Ross	PEMSEA	Chapter X: Paragraph 22	From text "It is unclear if this has already been consulted with and accepted by affected households"	The GEF Evaluation Office should not be "unclear" on such issues. The GEF/WB project (i.e., Manila Third Sewerage Project) included this aspect as part of its program and output.	Text removed based on new information reported by the Philippines
81	Stephen Adrian Ross	PEMSEA	Chapter X: Paragraph 23	Coastal zoning in Danang (Vietnam, GEF ID 597/2700) has led to large hotels being built along the coastline, limiting public access to the beach, especially for local fishers who used to live in the area. Again, no information was obtained on whether stakeholder compensation took place or not.	Coastal zoning was successfully applied in Danang as a planning, development and management tool. Without such a tool, the result is uncontrolled development and increasing social, economic and ecological degradation. The Danang government implemented the more progressive action, including provision of climate-proofed housing in nearby coastal areas zoned for residential use and fisheries.	In light of the new information, text has been changed to: "Coastal zoning in Danang (Vietnam, GEF ID 597/2700) has led to large hotels being built along the coastline, limiting public access to the beach, especially for local fishers who used to live in the area. PEMSEA reports that stakeholder consultation and compensation are said to have taken place, and displaced fishers provided improved housing in an area zoned for fishing."
82	Stephen Adrian Ross	PEMSEA	Chapter X: Paragraph 23	Compensation was given to affected parties after some negotiation, a three-year phase-out period was given for the aquaculture farmers to relocate, and alternative sites for development were provided. However, while these changes significantly improved water quality at the site, the alternative sites that received the aquaculture farms consequently became highly polluted. In this case, it has increased the costs for stakeholders who were not beneficiaries of the demonstration. This is one very concerning negative socioeconomic impact that emerges from implementing a demonstration in one site without addressing the problem at the larger scale (Mee 2010, Lau 2005, GEF EO 2004).	The history related to the conflicts between fisheries, shipping and aquaculture is more complex than indicated in this short summary. There were open conflicts between the sectors who were competing for sea space, resulting in bloodshed. The government needed to respond in order to avoid a worsening situation that was threatening the security of the area. Aquaculture farmers were compensated and set up in another area. While the solution was not optimum, it was a necessary measure. The problem is not completely solved, and subsequent measures will be considered as part of an evolutionary and adaptive approach under the city's ICM program.	Noted and contributions to conflict resolution acknowledged in text
83	Stephen Adrian Ross	PEMSEA	Chapter X: Paragraph 24	Both Xiamen and Danang are supported through the UNDP/PEMSEA funding stream, which promotes the ICM approach. This stream has typically followed the respective country's policies in dealing with relocation and resettlement issues that arise in the course of coastal zoning and ICM program implementation. However, the 2011 GEF Policies on Environmental and Social Safeguard Standards require implementing agencies to "...ensure that involuntary resettlement is avoided or minimized. Where this is not feasible, the Agency is required to ensure displaced persons are assisted in improving or at least restoring their livelihoods and standards of living in real terms relative to pre-displacement levels or to levels prevailing prior to the beginning of project implementation, whichever is higher." In these sites, resettlement issues that do not meet the recently approved GEF standards may pose a risk to GEF's reputation.	The resettlement issues mentioned in the above paragraph occurred long before this 2011 GEF policy. Nevertheless, the two local governments implemented the resettlement scheme in consultation with the affected families, provided benefits/compensation, and improved their safety, security and well-being.	Text modified to clarify that the 2011 GEF Policy does not apply to these resettlement issues, and emphasize the risk to GEF of not explicitly abiding by international standards.
84	Stephen Adrian Ross	PEMSEA	Chapter XI: Table 1	597/2700 Chonburi - UNDP/PEMSEA	The municipal governments of Chonburi have adopted a 3-year implementation plan for the coastal strategy and integrated the plan into their respective investment plans, totaling more than \$30 million in budgetary allocations across the province.	In light of the new information, relevant information has been included in the text
85	Stephen Adrian Ross	PEMSEA	Chapter XI: Table 1	597/2700 Manila Bay - UNDP/PEMSEA	Manila Bay is replicating ICM in the various coastal provinces, and is scaling up from coastal areas to river basins	In light of the new information, it has been included in the text
86	Stephen Adrian Ross	PEMSEA	Chapter XI: Paragraph 6	From text "In one case of mainstreaming, in Manila Bay (GEF ID 597), the process was through the implementation of the approach at a scale lower than that at which it was first introduced. To do this, the lower-scale management units (from the national to provincial/municipal levels) had to develop their own appropriate mechanisms for implementing the approach at their respective scales. The most far-reaching broader adoption so far is the integrated coastal management (ICM) approach that was first demonstrated in Xiamen and Batangas Bay starting in 1994. In both sites, GEF-supported follow-up projects through the UNDP/PEMSEA stream have played a key role in facilitating broader adoption."	This statement is poorly worded and promotes confusion of the issues. The Manila Bay Coastal Strategy provides the vision, strategic framework and action programs adopted by the various national agencies, local governments and stakeholder groups around the Bay and in the upland areas. Local governments apply ICM as the mechanism for achieving the objectives and targets over which they have responsibility. They do not "have to develop their own appropriate mechanisms for implementation....they utilize ICM. Bataan and Cavite are already implementing; Pampanga and Bulacan are just initiating. Metro Manila, on the other hand, has embarked on a number of sectoral programs, not ICM.	The text has been clarified as follows: In one case of mainstreaming, in Manila Bay (GEF ID 597), the process was through the implementation of the approach at a scale lower than the national, at which it was first introduced. To do this, the lower-scale management units (from the national to provincial/municipal levels) have mainstreamed the approach through their own implementing mechanisms appropriate to their respective scales, instead of simply implementing it under the national administrative framework.

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87	Stephen Adrian Ross	PEMSEA	Chapter XI: Paragraphs 6 and 7 (between)	From text "Broader adoption is more likely to take place through several different processes when four key conditions are in place: incentives to commit based on the attributes of the introduced technology or approach, institutional capacities of the adopting governments, available financial resources, and appropriate legal and regulatory frameworks."	PEMSEA's experience is that the key ingredient to broader adoption is demonstration/proof of benefit...without clear demonstration of governance, social, economic and/or ecological benefits, replication is a no-go.	Noted. The focus of the discussion is on other relevant factors as presented in the finding, which has been slightly modified to read " Broader adoption is more likely to take place through several different processes when four key conditions are in place: incentives to commit based on the attributes of the introduced technology or approach, institutional capacities of the adopting governments, available financial resources, and appropriate policy frameworks."
88	Stephen Adrian Ross	PEMSEA	Chapter XI: Paragraph 7	From text "The ICM approach was implemented in Xiamen, China, as part of the "Prevention and management of marine pollution in the East Asian Seas" (GEF ID 396) project. Although the focus of activities undertaken in Xiamen as part of this project was more on aiding the process of Xiamen's transformation to a more controlled development path and less on replication,"	Xiamen was developed with GEF funding as a national ICM demonstration site. It had two major objectives..to demonstrate how ICM can be used to address multiple use conflicts in an urban setting, over the years scaling up from a focus on pollution, to protection/conservation, to disaster risk management, to integrated river basin and coastal area management;to sustainable economic development. The model was also replicated, as noted below.	The text has been modified to: "The ICM approach was initiated in Xiamen, China, as part of the "Prevention and management of marine pollution in the East Asian Seas" (GEF ID 396) project. The focus of activities undertaken in Xiamen as part of this project was both to aid the process of Xiamen's transformation to a sustainable development path, and to serve as a demonstration of the application of the ICM model for the region."
89	Stephen Adrian Ross	PEMSEA	Chapter XI: Paragraph 10	From text "Sufficient foundational capacities in local governments were also in place before they began to implement ICM"	Foundational capacities in what context... not in ICM; perhaps this statement can be clarified as referring to some sectoral aspects of coastal resource management (e.g., fisheries).	Noted
90	Stephen Adrian Ross	PEMSEA	Chapter XI: Paragraph 10 - Paragraph 11 (between)	From text "Mainstreaming and scaling-up are most successful in areas that have the same characteristics as those in the demonstration site, most notably economic and governance capacities. In addition, mainstreaming works best where administrative and geographical boundaries match those of the problem being addressed."	This statement is a reflection of numerous misinterpretations by the Evaluation Office when describing the two streams (i.e., PEMSEA and SCS LME project) in the draft document. ICM is recognized and applied as a framework and process for improving governance. It is not a scientific process, but rather utilizes scientific input (e.g., vulnerability assessment of coastal resources and communities; natural and management threats to habitats/fisheries; climate change and extreme weather events) to strengthen governance and management decisions and programs. The draft document contains many suggestions concerning overlaps, lack of coordination, waste of resources, etc., when in fact ICM and the scientific process of other projects are complementary. In addition we emphasize that, based on PEMSEA's experience, the mainstreaming and scaling up ICM are not dependent on sites with the same characteristics as the demonstration site, most notably sites with robust economic conditions and governance capacities. If that were the case, the ICM programs in the developed world would all be highly successful.	The evaluation is assessing under what conditions broader adoption has taken place in the cases countries that were visited, as this is the evidence that the EO has. The finding has been slightly modified to "Mainstreaming and scaling-up are most successful in areas that have the receptive capacities as those in the demonstration site, most notably economic and governance capacities. In addition, mainstreaming works best where administrative and geographical boundaries match those of the problem being addressed."
91	Stephen Adrian Ross	PEMSEA	Chapter XI: Paragraph 10 - Paragraph 11 (between)	From text "Mainstreaming and scaling-up are most successful in areas that have the same characteristics as those in the demonstration site, most notably economic and governance capacities. In addition, mainstreaming works best where administrative and geographical boundaries match those of the problem being addressed."	Under the PEMSEA program, ICM has been scaled up in the EAS region from 6 national ICM demonstration sites to 31 ICM demonstration and parallel sites covering a little more than 11 percent of the region's coastline. The 26 parallel sites have utilized their own resources and/or support from the national government, the corporate sector and other stakeholders, to develop and implement ICM. These sites cover various political, social, cultural, economic and environmental situations. PEMSEA provides parallel sites with ICM and specialized trainings and technical support to advance them through the process. This is not to say that all ICM programs move at the same pace or achieve their targets in a consistent timeframe. Available resources and local capacities affect these variables. For this reason, PEMSEA is now focused on scaling up support mechanisms at the regional and national levels to be able to address the demands from local governments for ICM training and support, with the objective of achieving ICM coverage of 20% of the region's coastline by the end of 2015.	Noted and information included
92	Stephen Adrian Ross	PEMSEA	Chapter XI: Paragraph 13	From text "More recently, as part of a national law to implement ICM in all 14 coastal provinces of Vietnam, ICM was replicated in three other provinces (Thua Thien Hue, Quang Nam, Ba Ria – Vung Tau). The lessons in Danang have also been instrumental in spurring collaboration between PEMSEA and the government to expand ICM in 9 more provinces. Nevertheless, actual progress in broader ICM adoption has been slow. The cities to which ICM is being expanded to do not have the dynamism of Danang, a port city, nor access to as much fiscal resources. Decentralization policies in Vietnam, while delegating to provinces the responsibility for management of natural resources, have not fully transferred the necessary financial resources to put this into action. Key decisions such as approvals of EIAs are often still centralized. Existing capacities at the provincial level are also a limiting factor. Plans for the establishment of a national ICM training center in Danang have been slowed by lack of expected funding from the central government."	The ICM National Demonstration Project in Danang was initiated in 2000. Based on Danang's experience in ICM implementation, Quang Nam and Thua Thien Hue Province expressed interest to replicate Danang's practices and were established as ICM parallel sites in 2004 and 2008, respectively. The Vietnam-Netherlands ICZM Project (2000-2006) on the other hand, covered 3 provinces (i.e., Nam Dinh, Thua Thien Hue and Va Ria-Vung Tau). After its completion in 2006, Thua Thien Hue applied for ICM parallel site development with PEMSEA to continue its effort on ICM. In recognition of the achievements in ICM implementation in the above-mentioned areas and the importance of ICM as a framework for sustainable development of the coastal and marine areas, the National Government 1) approved in 2007, the National Program on ICM for North Central Region and Central Coastal Provinces until 2010 and Orientation until 2020 (Program 158), 2) initiated the formulation of the Law on Marine Resources and Environment, and 3) passed Decree No. 25 in 2009 on the Management of Marine Resources and Protection of the Marine Environment. With the establishment of the Vietnam Administration of Seas and Islands (VASI) in 2008, which is mandated to manage the seas and islands of the country in an integrated and unified manner, Vietnam has undertaken the necessary steps towards the integrated management of its coastal and marine environment and resources. Phase 1 of Program 158 has recently been completed. A proposal to expand the scope of the program to cover the remaining coastal provinces is being developed. In December 2010, the Provinces of Quang Ninh, Haiphong, Nam Dinh, Khanh Hoa, Va Ria-Vung Tau, Soc Trang and Kien Giang signed a commitment to implement ICM following Danang's example as part of scaling up ICM in the country.	Additional information included. Part of the text has been changed to: "More recently, as part of the 2007 National Program on ICM for North Central Region and Central Coastal Provinces, ICM was replicated in three other provinces (Thua Thien Hue, Quang Nam, Ba Ria – Vung Tau). " Though the progress in terms of policy has been noted, the focus here is on the actual ICM adoption by cities and provinces which has been slow.
93	Stephen Adrian Ross	PEMSEA	Chapter XI: Paragraph 14	From text "In Thailand, the ICM experience that started in the municipality of Sriracha in the province of Chonburi has gone in the direction of scaling-up, GEF-supported demonstration activities through the UNDP/PEMSEA stream started in Sriracha shortly after a new decentralization policy was passed, granting the local governments more responsibility in managing their natural resources"	On human, institutional and financial capacities, and application of the ICM model in Chonburi to other areas in Thailand: The framework and process of ICM implementation applied in PEMSEA sites includes gradual development of human and institutional capacities and sustainable financial mechanisms to support ICM implementation	Noted
94	Stephen Adrian Ross	PEMSEA	Chapter XI: Paragraph 19	From text "This resulted in aquaculture pollution being transferred to the other water body, instead of it being reduced over-all through appropriate regulations. As discussed above, Xiamen has, since 2004, scaled-up ICM to include other water bodies near the city, as well as to two cities in the Jilulong river basin, which has been a source of pollution in the bay."	The conflicts between fishers and aquaculture, shipping and aquaculture was severe, resulting in open conflicts and bloodshed. Urgent action was required, and moving and compensating the aquaculture farmers was the short-term solution. However, the need for a longer term solution is recognized.	Noted and contributions to conflict resolution acknowledged in text
95	Stephen Adrian Ross	PEMSEA	Chapter XI: Paragraph 20	From text "the increase in the geographical scale of implementation in Batangas did not require a change in the administrative scale."	This was not the situation in Batangas. Scaling up ICM from Batangas Bay to the entire province did require institutional and administrative changes. The Batangas Bay Council was originally composed of Batangas City and three local municipalities and various stakeholder groups in the Bay. Scaling up to cover the entire province required an new policy, strategy, administrative and institutional arrangements as well as budgetary realignments, at both the provincial and municipal levels.	Text modified to include information provided

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96	Stephen Adrian Ross	PEMSEA	Chapter XI: Paragraph 22	From text "The evaluation could not assess the progress made in replication sites. Only the port of Sihanoukville was visited, where port authorities expressed concern that while they were close in finishing the development of a PSHEMS plan, they did not have the technical capacities or financial resources to implement the plan."	The Evaluation Office needs to be reminded that implementation of the PSHEMS, like ICM, is a participatory and evolutionary process. The PSHEMS is developed by the local port authority, not PEMSEA or an international consultancy...we assist them through the process while the skills and understanding are developed among the port personnel. In the end, decisions concerning priorities and investments are the responsibility of the port authority and are part of the business plan of the port. In the case of Sihanoukville, the process is ongoing; and like other ports that have preceded them, we are confident that Sihanoukville will have a better understanding of PSHEMS and its benefits to the port, before the process is complete.	The evaluation is merely reporting the perception reported to the Evaluation Office by the port authorities in Cambodia.
97	Stephen Adrian Ross	PEMSEA	Chapter XI: Box text: Mainstreaming Lessons from GEF-Supported demonstrations	(Third paragraph) A major output of the project was the strategic action plan (SAP) for the region	It was not ratified by governments	Noted
98	Stephen Adrian Ross	PEMSEA	Chapter XI: Paragraph 27	From text "However, the reliance on "champions" may also have drawbacks, a risk that needs to be carefully managed by identifying and developing alternative pathways from the start of the initiative. When initiatives are closely associated with a given individual, such as a politician, they run the risk of not being supported by the subsequent leadership who may have different priorities and constituencies (e.g. change in governor of Batangas province, Philippines). A vacuum left after a champion's departure might also lead to the initiative making much slower progress (e.g. change of mayor in Sriracha, Chonburi province, Thailand). These transitions have typically required extensive efforts by GEF project staff to inform and convince new administrations of the merits of sustaining the initiatives."	This interpretation of ICM development and implementation needs to be clarified. Yes champions are an important and useful aspect of environmental projects and other efforts to facilitate new initiatives and change. But, ICM is not dependent on champions. In fact, ICM is about governance, and an early indicator of progress is the mainstreaming of ICM institutional arrangements into the local government structure and fiscal system. This does not necessarily guarantee that a change of government will not affect the program. PEMSEA has learned over the years that with a change of administration, there is a lull period, before the new administration picks up the program. There are many reasons, not the least of which is ownership by the new administration. However, in all of our experience, this lull period can be overcome through dialogue and awareness building.	Noted
99	Stephen Adrian Ross	PEMSEA	Chapter XI: Paragraph 28	From text "Two energetic visionary leaders played a crucial role in pioneering and sustaining two major streams of GEF funding in the SCS, but this became a key factor that contributed to competition and lack of coordination. Each started with robust, complementary schools of thought that GEF has helped to implement, but in many cases, the unresolved differences in personal approaches became choke points in implementing GEF's over-all IW strategy in the region."	These statements are unfounded. Where are the facts to support such statements...how can reference be made to personal approaches when PSCs comprised of countries and implementing agencies guided the projects. The fact is the approaches to the project were different...one used a sectoral approach focusing on habitats and their management; one used an integrated approach focused on the interactions and conflicts between different users and uses of coastal and marine resources and improved governance. There are synergies between these two approaches; one is a subset of the other, as confirmed in the SDS-SEA.	The text has modified to read "personal differences" instead of "personal approaches" to avoid misinterpretation.
100	Stephen Adrian Ross	PEMSEA	Chapter XI: Paragraph 31	From text "Mostly in account of having a strong project coordinating unit benefiting from continuous GEF financial support, PEMSEA has been operating much like a regional organization for nearly 20 years."	PEMSEA was identified by countries as a regional organization in 2006...that's 6 years ago. Prior to that, PEMSEA was operating as a regional project, with a Project Steering Committee.	The expression "much like a regional organization" is used to indicate that it was not formally an organization but acted as such <i>de facto</i> with a strong organizational identity.
101	Stephen Adrian Ross	PEMSEA	Chapter XI: Paragraph 32	From text "A feature common to all mechanisms is that they were created to develop and implement an action plan that embodies the priority concerns agreed upon by its member countries."	The basic instrument of a Regional Seas Programme is a regional convention, not an action plan. UNEP has not been able to establish a legal instrument in EAS after more than 30 years of effort.	The text has been clarified to: "Just as PEMSEA is the regional mechanism for implementing the SDS-SEA, the RSP intergovernmental bodies were created to develop and implement an instrument (i.e., a convention or action plan) that embodies the priority concerns agreed upon by its member countries."
102	Stephen Adrian Ross	PEMSEA	Chapter XI: Paragraph 33	From text "Table 1 shows the significant differences in costs and contributions across the compared regional mechanisms. These differences are partly explained by the number of member countries, geographical proximity, and country priorities. According to the available data, PEMSEA and COBSEA have the largest gap between country contributions and annual operating costs, as well as annual implementation costs. In the case of PEMSEA, the higher costs are related to a larger scope of work for the secretariat (the PEMSEA Resource Facility) than that for the regional seas bodies. Apart from communication and coordination services, and resource mobilization, other core secretariat functions are program management and supervision, defined as "guiding the development and implementation of policies and projects that strengthen PEMSEA and advance the objectives and outcomes of SDS-SEA implementation", and monitoring, evaluating and reporting on the status of SDS-SEA implementation. Another different function taken on by the PEMSEA secretariat that normally falls under resource mobilization is joint planning among partners and collaborators. These program management, resource mobilization, and monitoring functions as defined are not seen in other regional mechanisms."	This statement reflects some major differences between PEMSEA and other regional organizations. However, no attempt is made to quantify the implications of these differences. Instead, a very broad and unsubstantiated statement has been made in the follow-on paragraph 39.	The text has been clarified to emphasize the purpose of the comparison (i.e., the proportion of costs vs. country contributions internal to each regional mechanism, not across regional mechanisms), and the differences between PEMSEA and regional seas bodies.
103	Stephen Adrian Ross	PEMSEA	Chapter XI: Paragraph 34	From text "In that year's financial report, it was noted that "the current funding source structure creates a situation where the withdrawal, or substantial reduction in the contribution of a major funder affects the stability of the organization"	We feel that this statement has been taken out of context. The point being made was the PEMSEA needs to develop its sustainable financing plan with a high degree of urgency. PEMSEA responded by setting the development of the Plan as a priority, and approving the final Plan in October 2011.	The statement has been removed from the text and replaced with "PEMSEA is aware of the risks of their dependence on one major donor, and has developed a Financial Sustainability Framework Plan for strengthening PEMSEA through voluntary contributions and other financial mechanisms."

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104	Stephen Adrian Ross	PEMSEA	Chapter XI: Paragraph 36	From text "While it is clear that most countries value the services provided by PEMSEA, the process of establishing PEMSEA as an independent organization has been very slow. Several countries have expressed their weariness to this evaluation on having to support and participate in yet another regional organization. This has been evident in the steps leading to the creation of PEMSEA as an organization independent from its identity as a GEF project. When in 2006, 11 countries and 12 organizations signed the resolution appointing PEMSEA as the regional mechanism for implementing the SDS-SEA, Thailand and Malaysia did not sign. In 2009, with PEMSEA now an independent organization able to enter into contracts, 3 of the 7 GEF-supported countries bordering the SCS did not sign the Agreement Recognizing the International Legal Personality of PEMSEA."	The GEF Evaluation Office needs to compare the pace of establishing and sustaining other regional organizations; e.g., COBSEA; ASEAN; NOWPAP; Black Sea; etc. How slow has the PEMSEA process been in comparison?(i.e., ASEAN established in 1967 ratified the ASEAN Charter or the ASEAN legal personality only in 2007). Compared to other organizations that sought Headquarters Agreement with the Government of the Philippines (i.e., IRRI and ACB), PEMSEA was able to secure the concurrence and signature of the Department of Foreign Affairs of the Philippines in a shorter period of time (3 years). It is also important to note that the governance and institutional transformation of PEMSEA is being undertaken in parallel with the implementation of GEF and other projects on the ground, thus PEMSEA has shown significant scaling up in four dimensions: policy and institutional, geographical coverage, functional coverage, and partnership during that period. It is not standing still.	Noted. Less emphasis has been made on the pace of adoption.
105	Stephen Adrian Ross	PEMSEA	Chapter XI: Paragraph 34	From the text "It is also not clear if the conditions have been met for the agreement to come into force."	The questions being raised by the Evaluation Office is the process used by PEMSEA and its Country Partners to establish the legal personality of the organization, and whether the Ministers and Senior Government Officials who signed the Agreement in November 2009, in the presence of the President of the Philippines, senior representatives from GEF, UNDP, UNEP, World Bank, IMO, their countrymen and a host of other international guests, had the authority to do so. We find these questions and the insinuation that PEMSEA and the National Governments of the EAS region are not capable or aware of the UN process in establishing an international agreement to be insensitive and reckless. In fact, this whole effort was headed by a Technical Working Group comprised of eminent lawyers and statesmen who were familiar with UN procedures for development and approval of international agreements. The approval process for each participating country was presented and discussed thoroughly during EAS Partnership Council and Executive Committee meetings and authorizations of full powers for the respective signatories were provided to PEMSEA, as required by national law, from the respective Foreign Affairs Departments. In other words, we followed the process to the full requirements of the UN and national legal systems. Finally, our available records do not indicate such information being requested by the Evaluation Office at any time.	The Evaluation Office is not making a statement on anyone's lack of capability and awareness. It is just stating that from the text it did not find it clear which of the countries that signed the agreement had met the conditions for the agreement to come into force. This information was a requested by Aaron Zazueta to Raphael Lotilla in an email on December 1, 2011. The reply by Mr. Lotilla did not sufficiently clarify the conditions. The explanation of the process followed prior to signature of the agreement which is now provided by PEMSEA provides sufficient evidence that the conditions were met, thus this text is not included in the final report of the evaluation.
106	Stephen Adrian Ross	PEMSEA	Chapter XI: Paragraph 39	From text "Given that PEMSEA has one of the highest operating costs compared with similar regional mechanisms, it is unclear at present how the resource-intensive core functions of the PEMSEA Resource Facility (PRF) as currently defined can be supported over the long-term, not to mention the implementation-related technical support that is proposed to be provided by the PRF as well."	The GEF EO has neglected to consider a few important facts in its comparison of PEMSEA to other regional organization, namely: scope of the program; institutional/legal characteristics, and geographic coverage. Specifically, the Evaluation Office does not acknowledge acknowledging PEMSEA's scope (sustainable development), its efforts to transform (institutional/legal transition from a project to a regional institution, which began in 2006), and geographic coverage (the entire EAS region). And yet, comparisons are made with other regional organizations with narrower scope, remain within the UN framework, and have less geographic coverage. We know that there is much to do in the transition process and that is why a 10-year transformation period was agreed to by countries and GEF. The basis for comparison is seriously flawed without establishing a common standard for assessment.	The text has been clarified to emphasize the purpose of the comparison (i.e., the proportion of costs vs. country contributions internal to each regional mechanism, not across regional mechanisms), and the differences between PEMSEA and regional seas bodies.
107	Stephen Adrian Ross	PEMSEA	Chapter XI: Paragraph 39		There are 6 main objectives/targets in the 5-year SDS-SEA Implementation Plan, as developed and adopted the Country Partners. They include: 1) a self-sustaining regional mechanism in place and fully functional; 2) national coastal and ocean policies and supporting institutional arrangements in place in at least 70% of Partner Countries; 3) ICM programs for sustainable development of coastal and marine areas and climate change adaptation covering at least 20% of the region's coastline; 4) reporting system to measure/assess progress of ICM programs, with reports to Council every three years, including measures taken for climate change adaptation; 5) capacity development and knowledge management programs in place at the regional, national and local levels to raise public awareness and competence, build and strengthen multi-sectoral participation in support of sustainable development of the coastal and marine environment and to mobilize increased investments from the public and private sectors to protect coastal and marine ecosystem services; and 6) sustainable financing to realize adequate funding to develop and sustain commitments to the SDS-SEA implementation and ICM scaling up programs at the national, local and subregional sea/LME levels. We don't understand the concern being expressed by the Evaluation Office regarding the Implementation Plan. If need be, the PRF would be pleased to explain the substance of each objective, action and indicator that have been agreed to by the Partner Countries.	Noted
108	Stephen Adrian Ross	PEMSEA	Chapter XI: Paragraph 40		PEMSEA does not post details concerning budget and the budget distribution at the site or country level on its web site. However, the GEF EO makes two incorrect assumptions, namely: 1) that we don't have the information; and 2) that we don't share it with the Executive Committee and the Partners. By decision of the EAS Partnership Council, financial matters are discussed only in the closed Intergovernmental Sessions and Executive Committee meetings of the EAS Partnership Council. Budgetary details are provided in the closed sessions, and are then aggregated when posted on the web-site. GEF, UNDP and World Bank, as sponsoring organizations, participate in the closed sessions of Council.	The Evaluation Office makes none of those assumptions it just makes the point that accounting is not sufficiently transparent for a regional organization. This information has been taken out of the report and will be transmitted to the appropriate authorities in the GEF.
109	Stephen Adrian Ross	PEMSEA	Chapter XI: Paragraph 40		Comment is repeated in letter referred to in comments from Stephen Adrian Ross comments nos 43, 44, and 115	Responses provided for aforementioned comments nos. 16, 43, 44, and 115
110	Stephen Adrian Ross	PEMSEA	Chapter XI: Paragraph 41		We fail to see the basis for comparison, as explained in our previous comment. PEMSEA is unique relative to the examples cited.	The text has been clarified to emphasize the purpose of the comparison (i.e., the proportion of costs vs. country contributions internal to each regional mechanism, not across regional mechanisms), and the differences between PEMSEA and regional seas bodies.
111	Stephen Adrian Ross	PEMSEA	Chapter XI: Paragraph 41	"There are also plans in an advanced stage of development for the creation of a Yellow Sea Commission within the NOWPAP region"	The GEF EO needs to be reminded of the scope and coverage of this evaluation. Yellow Sea and NOWPAP are outside of the boundaries of this project, so why are they being critiqued?	This is not a critique but a note on similar GEF initiatives in adjacent areas. The sentence has been removed.

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112	Stephen Adrian Ross	PEMSEA	Chapter XI: Paragraph 41	From text "This has created a risk of regional mechanisms becoming dependent on GEF to indefinitely fund activities that the member countries themselves are not willing to support with their own resources"	Perhaps the Evaluation Office can relate this assessment to the South China Sea LME project? There certainly was a lack of commitment in that governments did not formally ratify the SAP. Obviously that "stream" was using an inappropriate strategy at some of point in the program? What can GEF and its investors learn from that experience? Why was the UNDP/PEMSEA stream successful in addressing this important issue? Are there no lessons or recommendations?	The impact evaluation is not on any particular stream but on how over all GEF support contributes to progress towards impact. The differences in approaches of each stream, however, are compared and discussed relative to GEF's mandate of addressing regional transboundary concerns in Section 6.5 of the final report. Extent of country support to both streams is also discussed in Section 6.2. The specific paragraph has been removed.
113	Johannes Dobinger	UNIDO	Paragraph 284	Report states "In Baatan (GEF ID 2329), where a non-combustion plant for destroying persistent organic pollutants (POPs) was to be constructed, GEF funding constituted a major part of financing required for total outlay, and was central to the activities undertaken. The project was closed, however, without the facility being built."	The truth is that the project is ongoing and the facility was built and has been partially commissioned for low-level PCBs. We received an extension from the GEF until December 2012. The full commissioning of the facility is yet pending. A draft terminal evaluation report has been prepared for this project, but a second evaluation mission after full commissioning is pending (planned for October/November). The report should reach you before end of the year.	Text has been corrected to read "In Baatan (GEF ID 2329), where a non-combustion plant for destroying persistent organic pollutants (POPs) was to be constructed, GEF funding constituted a major part of financing required for total outlay, and was central to the activities undertaken. All construction work is expected to be completed by October 2012, after which the facility can be commissioned and operated to demonstrate the treatment of 1,500 metric tons of polychlorinated biphenyl (PCB)."
114	Ivan Zavadsky	GEF Secretariat	Paragraph 41		An opportunistic approach, due to regional/national political situation could be added to GEF IW support evolvement;	The text has been changed to read "Not all GEF IW focal area projects may follow this sequence in types of activities for addressing transboundary water concerns. Projects that are not consistent with this progression are often undertaken on an opportunistic basis because they facilitate country buy-in and/or make targeted contributions to a priority transboundary concern of the countries in the region."
115	Ivan Zavadsky	GEF Secretariat	Paragraphs 121-123	Multilateral financing	does not mention Nov 2011 Council approved WB PA with specific grant allocation to coordination and KM via PEMSEA, please see more below	Included
116	Ivan Zavadsky	GEF Secretariat	Box 1, Page 47		The degree of similarity between UNEP/SCS and UNDP/PEMSEA is over estimated, please see arguments in comments below	The text has been modified, and the differences and similarities clarified, particularly in Section 6.2 of the final report.
117	Ivan Zavadsky	GEF Secretariat	Chapter VI: Paragraph 147		While characterizing the SDS-SEA, its vision , objectives, etc. an important piece of commitments is missing – the measurable targets on portion of coasts under ICM policy/regulation and pollution reduction targets as well as the agreed reporting mechanism of meeting those targets- regular State of the Coast Reports;	This was already included in the draft report.
118	Ivan Zavadsky	GEF Secretariat	Chapter VI: Paragraph 150		not in line with para 36 of Chapter XI, which conclusion are addressed later;	The explanation of the process followed prior to signature of the agreement which is now provided by PEMSEA provides sufficient evidence that the conditions were met, thus this text is not included in the final report of the evaluation.
119	Ivan Zavadsky	GEF Secretariat	Table 6 (Page 48/9) and Annex 4/B		Haikou Partnership Agreement on Implementation of the SDS-EAS (2006) is missing;	Explanation given in Annex 4B – Table 20
120	Ivan Zavadsky	GEF Secretariat	Chapter VI: Paragraph 171	The incremental value of GEF support was to help speed up the process of adoption, sometimes contributing to making the process more efficient through the introduction of new technology, technical assistance, and facilitating the sharing of lessons, approaches and learning across the region. <i>But it is likely that similar activities would have taken place even without GEF support</i>	The sentence with footnote 21 makes a judgment statement nut the Chapter X does not provide promised evidence, the statement sounds arbitrary then;	The sentence has been removed leaving just the first sentence with the footnote: "The issue of incremental value of investment fund activities is addressed on the basis of information obtained from sampled sites in Chapter VIII (Table 10)"
121	Ivan Zavadsky	GEF Secretariat	Chapter VI: Paragraphs 175-189		the study rightly pointed out to GEF long standing policy not to support through GEF grants the regular programmes of the agencies, which regional seas programme of UNEP de facto is as well to low political will of COBSEA and its capacity to implement such initiatives/projects as the gradual evolvement of PEMSEA delivered. The conclusion, however advises that in the time of starting these initiatives GEF have chosen new untested path to create a new institution instead using existing one, which did not have and still does not have appropriate reporting mechanism and level of commitment in absence of inter-governmental processes allowing support to implement its strategic plan. The "error of fact is" that two incomparable entities and mechanisms have been compared and conclusion of inefficiency, duplication was made. In particular the last sentence of para 185 comes from the assumption of high degree of comparability of different mechanisms	The sentences have been removed. The complementarity and overlaps of the two funding streams are further discussed in Sections 6.2 and 7.1.
122	Ivan Zavadsky	GEF Secretariat	Chapter VI: Paragraph 185	From the text "Both have developed state-of-the art websites rich in information. Both streams of funding have also made wide use of meetings or congresses as a means to help build relationships among individuals and organizations across the region, but they have mostly done it independently from one another. The implications are that in over nearly 20 years, inefficiencies caused by duplications in activities between these two complementary initiatives likely run in the millions, much of it paid by GEF grants, countries, and its co-financing partners. ". "	These two databases and websites cater to two different constituencies and projects that have very different geographical and political boundaries and scope	The sentences have been removed.
123	Ivan Zavadsky	GEF Secretariat	Chapter VI: Paragraph 190	From text "With the increasing demand for GEF IW funds and the limited resources available, GEF-supported initiatives now compete for the resources that GEF is able or willing to allocate to the SCS."	Evidence for such a strong statement as in the last sentence has not been found in the study, taking into account differences in two mechanisms in question;	Examples communicated to the EO during interviews.
124	Ivan Zavadsky	GEF Secretariat	Chapter VI		The EAS 2010 Stocktaking Meeting results and guidance is entirely missing in the study, as well as mentioning of the new WB PA approved by the Council in Nov 2011. Please see more on the strengthening of the coordination of GEF interventions in the region, as quoted below in the text on this programmatic approach;	Noted and has been included in the report
125	Ivan Zavadsky	GEF Secretariat	Chapter XI: Paragraph 28		Describes a double edged sword of relying too much on Champions in the region. It seems that this is related to individual persons that have been employed by the two regional projects. It is not clear to what extent such an issue is for GEF to deal with. It could be argued that personal issues are to be dealt with by the agencies and not GEF. If GEF intervenes then GEF would undertake responsibilities of the implementing agency	The agencies are part of the GEF partnership and are indeed in a position to address personality issues. The issue of managing the risk of champions is addressed in the recommendations regarding accountability for coordination within the GEF partnership.

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126	Ivan Zavadsky	GEF Secretariat	Chapter XI: Paragraph 29-30		Mention that the LME approach was selected....., as there were few other alternatives. Please consider that there were other alternatives (ICM, ICZM and ecoregions) but none of them offered such a unique blend of including geographical boundaries, economical interests and local and regional political interest, hence making most transboundary sense. So in the end this is not solely a matter of "there were few alternatives" but simply because this was the most sensible approach and have been able to provide a strong management framework producing results consecutively over the last two decades.	The sentence has been removed.
127	Ivan Zavadsky	GEF Secretariat	Chapter XI: Paragraph 31	mentions that: "... PEMSEA has been operating much like a regional organisation for nearly 20 years."	We believe that PEMSEA has been operating like a regional organisation for nearly 20 years. So simply get rid of the "much"	Noted. This is an idiomatic expression with a specific implication.
128	Ivan Zavadsky	GEF Secretariat	Chapter XI: Paragraph 36	Mentions that "... 3 out of 7 did not sign the Agreement Recognizing the International Legal Personality of PEMSEA"	Do we know why this is??? If so it would be a good idea to include this explanation, otherwise it stands out as if the countries are not interested in PEMSEA.	The lack of interest and support for new regional organizations was communicated to the EO by some country representatives. This is mentioned in the report.
129	Ivan Zavadsky	GEF Secretariat	Chapter XI: Paragraph 38	From text "PEMSEA has one of the highest operating costs compared to similar regional mechanisms"	Comparison as done on pp. 13 of Chapter XI, does not support this thinking directly, as none of the regional organisations compared in the table has the same mandate and the same geographical scope, furthermore, e.g. PERSGA seems to have higher annual operation costs than PEMSE. Plus the level of detail s of analyzing PEMSEA mandate, operation costs and mandate is done by the study in much more detailed way as other compared but incomparable mechanisms. To draw fair conclusions the level of analysis should have been the same. However the key point is the comparison cannot be done properly due to differences repeated in these comments;	The text has been clarified to emphasize the purpose of the comparison (i.e., the proportion of costs vs. country contributions internal to each regional mechanism, not across regional mechanisms), and the differences between PEMSEA and regional seas bodies. The evaluation points to the GEF the financial risks of supporting the <i>expansion</i> of PEMSEA in the current regional and global economic context.
130	Ivan Zavadsky	GEF Secretariat	Chapter XI: Paragraph 39	Mentions that: "given the reluctance of governments to fund PEMSEA, the organisation faces a dilemma....."	We do believe that PEMSEA is collecting financing from some of the partner countries; maybe this should be mentioned to show that the organisation is moving in the right direction.	New information from PEMSEA on contributions of partner countries and some of the self-sustaining initiatives have been included in the text.
131	Ivan Zavadsky	GEF Secretariat	Chapter XI: Paragraph 41	Mentions that " This has created a risk of regional Mechanisms becoming dependent on GEF to indefinitely fund activities that the member countries themselves are not willing to support with their own resources."	We would argue that there is historical information proving the opposite, but that sure GEF funds the initial phases and then the countries in the region will gradually take over and make sure to fund the regional obligations and activities of the regional organisation. Please consider to remove the last sentence of Para 41, to avoid any confusion.	The paragraph has been removed from the final report.
132	Ivan Zavadsky	GEF Secretariat	General Comment	Little information and comments on WB EAST ASIA Investment fund and its links to PEMSEA:	Rapid urban and agricultural growth in East Asia has resulted in highly polluted coastal conditions. The GEF/UNDP PEMSEA International Waters project has worked with the East Asian countries since 1994 to adopt policies for integrated coastal management that can reverse the degradation. Complementing these policy reforms has been an investment program that countries utilize to reduce coastal pollution. This partnership with GEF and the World Bank has provided at the request of East Asia countries close to \$US100 million dollars in GEF grants along with \$US 1.8 billion co-financing since 2005 for innovative pollution reduction.	Additional information and explanation included in the text
133	Ivan Zavadsky	GEF Secretariat	General Comment	Little information and comments on WB EAST ASIA Investment fund and its links to PEMSEA:	The partnership has piloted national projects with innovative and appropriate treatment for human sewage and agriculture pollution consistent with the Global Programme of Action for Protection of the Marine Environment From Land-based Activities to help restore the Yellow Sea, East China Sea, and South China Sea Large Marine Ecosystems. With new approvals in November 2011, the partnership is scaling up its investments to include improved management of coastal habitats that can help reduce global warming by trapping carbon emissions and reducing nutrient input to the East Asia Seas As a direct consequence of the first GEF investments the nutrient reduction to the East Asia Seas total more than 25,000 t N/yr and 7,500 t P/yr.	Additional information and explanation included in the text. On the amount of nutrient reduction resulting from investment Fund projects, no reports beyond January 2010 have been provided or obtained, and the technologies in the Investment Fund sites incident on the SCS have yet to complete construction.
134	Ivan Zavadsky	GEF Secretariat	Paragraph 45		Few information and comments on WB EAST ASIA Investment fund and its links to PEMSEA:	Additional information and explanation included in the text
135	Ivan Zavadsky	GEF Secretariat	General Comment		As stated in the Programmatic Framework Document (PFD) approved by the GEF council in November 2011, the continuous coordination and acknowledgement of PEMSEA as a strong regional partner institution has been repeated numerous times in the PFD:	The Evaluation office notes the importance of PEMSEA as a regional partner institution. Additional information and explanation included in the text.
136	Ivan Zavadsky	GEF Secretariat	Paragraph 45		It is unclear what is meant with the following sentence: "These projects account for high levels of co-financing because GEF generally supports the capacity building components of these projects". We are not sure that it is due to capacity building that the co-financing is high, rather due to the infrastructure investments that go along with those nutrient investments.	For clarity the text has been changed to "These projects account for high levels of cofinancing because GEF generally only supports some components of these projects, such as capacity-building, whereas the physical infrastructure construction – which requires considerable outlay– is supported through cofinancing by the recipient countries through loans and internal resources."
137	Ivan Zavadsky	GEF Secretariat	General Comment		Throughout the publication Vietnam is spelled both like Vietnam or Viet Nam (e.g. on page 41, para 126 and para 127). Maybe better to choose one version throughout the publication;	Noted and the spelling has been kept to Vietnam
138	Ivan Zavadsky	GEF Secretariat	Paragraph 130		Para 130 refers to chapter XX, which chapter is that?	Correction: Chapter XI
139	Ivan Zavadsky	GEF Secretariat	Chapter VI and Figure 8		Mentions a number of bilateral donors that have supported coastal and marine initiatives in the region. However, looking at figure 8, some of these countries have not made into the figure, especially as some are then listed in table 7 on pp 53. There does not seem to be full correlation between these figures, tables;	Figure adjusted to show text of entire legend.
140	Ivan Zavadsky	GEF Secretariat	General Comment		Several conclusions are based on basic assumption that all regional cooperation mechanisms are either fully comparable or operate in the same/comparable regional scale with comparable legal/institutional and policy/planning or strategic framework. This was particularly applied in comparison of COBSEA, NOWPAP and other UNEP Regional Seas programmes with the PEMSEA, an SDS-EAS implementation framework serving 7 LMEs in East Asia. This assumption led to conclusions challenging the continuing GEF support to PEMSEA and the processes and action supporting the implementation of the SDS-EAS through UNDP/PEMSAA projects under the unifying ICM principle allowing promote/demonstrate and to mainstream necessary legal and policy changes in the participating countries. The study provided ample evidence of these.	The text has been clarified to emphasize the purpose of the comparison (i.e., the proportion of costs vs. country contributions internal to each regional mechanism, not across regional mechanisms), and the differences between PEMSEA and regional seas bodies.
141	Ivan Zavadsky	GEF Secretariat	Chapter XI	The study, in particular the sort of summary of the GEF interventions in the region in Chapter XI indicates sort of "Errors on Facts":	The first error of fact is the firm comparison of PEMSEA and COBSEA and NOWPAP. There are no signature agreements, no conventions in those cases under UNEP Regional Seas bodies. The plans that are old, although the COBSEA one was revised in 2008, serve for them just as framework "plans" with no monitoring and commitments. They only hold meetings, so it is an error of fact to compare the PEMSEA - an action-oriented, on the ground, technical assistance entity with a legal personality to these other two that of course have lower costs because they do very little - mostly meetings. This is a false comparison because PEMSEA has the numerical targets, reporting, inter-governmental procedures, etc. that result from country signatures -a first in the region at that level. Because of this extra action in commitments signed internationally, the PEMSE approach deserves international funding for tech assistance as the countries meet commitments.	The text has been clarified to emphasize the purpose of the comparison (i.e., the proportion of costs vs. country contributions internal to each regional mechanism, and the differences between PEMSEA and regional seas bodies. The evaluation points to the GEF the financial risks of supporting the <i>expansion</i> of PEMSEA in the current regional and global economic context.

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142	Ivan Zavadsky	GEF Secretariat	Chapter XI	The study, in particular the sort of summary of the GEF interventions in the region in Chapter XI indicates sort of "Errors on Facts":	Further, the study documented the results of the UNDP PEMSEA on implementation and mainstreaming - that PEMSEA sought replication and mainstreaming through national policy/legal action. For example in Philippines, the national executive order on replication of ICM—very important so that costs are borne by the government for ICM in meeting the SDS-AES targets. The same in China, where the Xiamen demo resulted in a national law requiring zoning of sea space use as a foundation for ICM, now it is called spatial marine planning in a new fancy way. But the chapter XI and the conclusion entirely omitted these significant indicators of progress in drawing its conclusions and comparisons. Because of this and other facts stated above the chapter should not advise that comparisons can easily be made.	The extent and forms of broader adoption in these two countries are well-documented in Chapter XI, and the factors influencing this are discussed. As noted in the report, there are differences among the SCS countries in their extent of broader adoption of ICM at the local and national scales, as well as in their support for PEMSEA as a regional mechanism.
143	Ivan Zavadsky	GEF Secretariat	Chapter XI	The study, in particular the sort of summary of the GEF interventions in the region in Chapter XI indicates sort of "Errors on Facts":	Finally, the SDS-SEA with countries signing says that there needs to be a last 5 years with declining GEF support over that time to zero at end of 5 years in which the PEMSEA apparatus is fully mainstreamed. It is not correct to now make these statements in this chapter without recognizing that this last time of GEF support should be planned with GEF support proportionately declining so by year 4 GEF funding ends and countries pick up 100%. This is the design; the evaluation is being conducted before the designed mainstreaming of the resource facility/secretariat costs is completed. Results papers document that also the Western and Central Pacific Fisheries Commission (WCPFC) is direct result of a GEF investment and that it today paid through dues like ICPDR, there are examples from both marine and freshwater systems of the viability of GEF approach.	Section modified to include addition information on PEMSEA's Financial Sustainability Plan.
144	Ivan Zavadsky	GEF Secretariat	Chapter XI		What the facts documented and what therefore the study should reflect is that while these different bodies are not comparable and a local implementation-based action program with international numerical commitments and a legal personality (no legal personality for COBSEA or NOWPAP) naturally take more GEF money to get off the ground. This was planned, and is scheduled for the next 5 years. The study recommendations could remind GEF that the final PEMSEA GEF project shows these commitments to national funding of PEMSEA fully by end of the last but one year of the project.	Section modified to include addition information on PEMSEA's Financial Sustainability Plan. The text has also been clarified to emphasize the purpose of the comparison (i.e., the proportion of costs vs. country contributions internal to each regional mechanism, not across regional mechanisms), and the differences between PEMSEA and regional seas bodies. The evaluation points to the GEF the financial risks of supporting the <u>expansion</u> of PEMSEA in the current regional and global economic context.
145	Ivan Zavadsky	GEF Secretariat	Recommendation		The last GEF funding of the PEMSEA transformation should request the assembly of a final mainstreaming scorecard per project site, country and secretariat, which would show this expected mainstreaming of costs and the actual numerical progress on ICM over time.	Noted and encouraged
146	Analiza Rebuelta-Teh	Department of Environment and Natural Resources, Republic of the Philippines	Paragraph 291	From text "... Manila Bay (Philippines), did not show evidence of pollution reduction even after having implemented demonstrations for more than a decade... Pollution therefore continues to increase in Manila Bay"	The evidence of pollution reduction should take into consideration that there are many other factors that affect the results of the implementation of demonstrations, unless the Manila Bay area had been isolated from other contaminating factors or activities. There must be at least a scientific basis that there was no pollution reduced despite application of approaches. These approaches are even supported by significant amounts of investments coming from different sources and by way of collaboration. On the other hand, the Manila Bay still thrives despite economic and population growth, and could have possibly further deteriorated if no interventions have been done	Text modified to: "In Manila Bay, coliform levels have greatly decreased at some monitoring stations, increased in others, but remain high. BOD levels continue to increase. This site has experienced hypoxic episodes since 1980, and continues to be subjected to larger-scale drivers such as economic and population growth in the megacity draining into the bay—factors that are beyond the scope of the demonstration. However, the national government is currently making significant investments in cooperation with the private sector and development agencies towards reducing pollution levels and improving water quality to a level mandated by the Supreme Court of the Philippines. One form of investment is through the construction of wastewater treatment plants by 2016."
147	Analiza Rebuelta-Teh	Department of Environment and Natural Resources, Republic of the Philippines	Paragraph 246	From text "....."	In the case of Manila Bay, the revised Operational Plan for the Manila Bay Coastal Strategy (OPMBCS) has adopted the area-based approach as a strategy framework to focus on the management of the priority river systems from ridge to reef, its socio-economic activities, the water quality and health of its ecosystem. Presently, the water quality monitoring covers sixteen (16) major rivers with 79 sampling stations. Water quality status of these water bodies is determined through the levels of important parameters against the set standards. Presently, the Department of Environment and Natural Resources, through the Manila Bay Coordinating Office (MBCO) with the University of the Philippines - National Hydraulics Research Center (UP-NHRC), initiates the development and simulation of model on the Total Maximum Daily Load (TMDL) for the Manila Bay region. This will set the loading capacity or the maximum loading that Manila Bay can receive to meet the Class SB quality as desired by the Supreme Court.	Noted
148	Analiza Rebuelta-Teh	Department of Environment and Natural Resources, Republic of the Philippines	Paragraph 291		As of the 1st quarter of 2012, results of the water quality monitoring of the bay revealed that a decreasing trend of Dissolved Oxygen (DO) from top to bottom in all stations was observed by the Total Coliform counts along the bathing beaches of the bay are improving. With rapid economic and population growth, the pollution indicator such as Biochemical Oxygen Demand (BOD) loading to Manila Bay is increasing. As part of the OPMBCS deliverables, the agencies tasks to help reduce the pollution levels through construction of sewerage/sanitation treatment plants have respective targets to achieve by 2016	Additional information included. Text modified to: "In Manila Bay, coliform levels have greatly decreased at some monitoring stations, increased in others, but remain high. BOD levels continue to increase. This site has experienced hypoxic episodes since 1980, and continues to be subjected to larger-scale drivers such as economic and population growth in the megacity draining into the bay—factors that are beyond the scope of the demonstration. However, the national government is currently making significant investments in cooperation with the private sector and development agencies towards reducing pollution levels and improving water quality to a level mandated by the Supreme Court of the Philippines. One form of investment is through the construction of wastewater treatment plants by 2016."
149	Analiza Rebuelta-Teh	Department of Environment and Natural Resources, Republic of the Philippines	Paragraph 310		In addition to this, the MBCO has developed a database for Informal Settlers, Households, Establishments, and River (ISHER) System. This is planned to integrate into the existing IIMS as Site Management Offices (SMOs) of MBCO are continuously updating their IIMS.	Additional information included
150	Analiza Rebuelta-Teh	Department of Environment and Natural Resources, Republic of the Philippines	Paragraph 335		In the Philippines, the MBCO consolidates and disseminates monitoring data results on Manila Bay from the Environment Management Bureau (EMB), Laguna Lake Development Authority (LLDA) and the Pasig River Rehabilitation Commission (PRRC), and the accomplishment reports on the status of the implementation of the OPMBCS from 13 comandamus and concerned agencies.	Additional information included

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151	Analiza Rebuelta-Teh	Department of Environment and Natural Resources, Republic of the Philippines	Paragraph 336		Each of the Mandamus Agencies is mandated by the Supreme Court to submit quarterly Manila Bay report based on their identified Key Performance Indicators (KPIs). Likewise, the MBCO, as the coordinating body, consolidated, reviews and prepared agencies' report as part of the report of the Department of Environment and Natural Resources for the Manila Bay Advisory Committee	Additional information included
152	Analiza Rebuelta-Teh	Department of Environment and Natural Resources, Republic of the Philippines	Paragraph 338		Monitoring data collected in Manila Bay and its major tributaries are submitted to the Manila Bay Coordinating Office (MBCO) are used for evaluation and in coming up with recommendations on a plan of actions to improve the water quality of the rivers draining into Manila Bay	Additional information included
153	Analiza Rebuelta-Teh	Department of Environment and Natural Resources, Republic of the Philippines	Chapter X: Paragraph 22	The joint sewage-septage treatment plant still being constructed in Manila (Philippines, GEF ID 2759) will require user fees resulting in 50% higher water charges for households. It is unclear if this has already been consulted with and accepted by affected households. The same is happening in Qui Nhon (Vietnam, GEF ID 2758), where a chemically enhanced sewage treatment plant that is currently being built will also require an increase in fees, though in this case a gradual one. At both sites, some households also had to be relocated to make way for the wastewater treatment plants, with agreed-upon compensation provided.	The 50% increase in water charges as user fees is speculative considering that public consultations are yet to be conducted, according to MTSP. Re-phrasing is recommended as, "The joint sewage-septage treatment plant being constructed in Manila (Philippines, GEF ID 2759) may possibly increase user fees but still subject to public consultations on rate rebasing."	The specific sentence has been deleted.
154	Analiza Rebuelta-Teh	Department of Environment and Natural Resources, Republic of the Philippines	Chapter XI: Paragraph 10	Mechanisms and factors affecting progress to impact, footnote2 which states, "The progress in this project (referring to ICRMP) has been delayed, and no results had been achieved at the time of the evaluation."	This chapter refers to factors affecting progress, hence, the report should mention the status of project implementation in terms of adopting elements of the ICM approach and what had been the factors affecting implementation. A sweeping statement that there have been no results in the ICRMP implementation is unfair. Even at the stage of data gathering for the evaluation, the project was already more than halfway of its project life, and definitely, there were already project results albeit short of set targets. It is more appropriate, therefore, to state that initial results have been generated from the LGUs that the ICRMP is working with. For instance, since CY 2010, about 68 ICRM plans have already been developed and adopted by the concerned LGUs in the 6 provinces covered by the project. Because of these plans, these LGUs have already located their own internal funds to execute their plans, specifically for coastal law enforcement activities, Marine Protected Area establishment and management, and solid waste management, among others.	Additional information included in the text: "While implementation of this project has seen delays, about 68 ICRM plans have been developed and adopted by participating municipal governments in 6 provinces since 2010, and local government funds have been allocated to implement these plans for such activities as coastal law enforcement, MPA establishment, and solid waste management."
155	Analiza Rebuelta-Teh	Department of Environment and Natural Resources, Republic of the Philippines	General Comment		It is noteworthy that Philippine Administrative Order (AO) No. 29 declaring/renaming "maritime areas on the western side of the Philippine archipelago as the West Philippine Sea, to include the Luzon Sea as well as the waters around, within and adjacent to the Kalayaan Island Group and Bajo De Masinloc, also known as Scarborough Shoal," was issued on 05 September 2012 by the President. Consequently, geographical and territorial references to coastal, nearshore and maritime ecosystems within the Philippine exclusive zone (EEZ) should be attributed to the West Philippine Sea.	Explanatory footnote on different names for the South China Sea included, as well as on the use of the standard name adopted by the International Hydrographic Organization throughout the report.
156	Analiza Rebuelta-Teh	Department of Environment and Natural Resources, Republic of the Philippines	Paragraph 14		Under Challenges in Assessing Impact, it can be added here that one way for "multiple actors with diverse interests" to be addressed is through collaboration among the six member nations of the Coral Triangle Initiative on Coral Reefs, Fisheries and Food Security (CTI-CFF) evident through their 10-year Plan of Action which joining priorities, goals and commitments to action. Moreover, the effort to establish collective and parallel action at regional, national, and subnational facilitated through the Regional Plan of Action (RPOA) and translated into the National Plan of Action (NPOA) by each of the CT countries	Noted. Achievements in the CTI are not included in the evaluation as it is not part of the SCS and Gulf of Thailand LME. However, some CTI projects have incidence on the SCS and are included in the evaluation portfolio.
157	Analiza Rebuelta-Teh	Department of Environment and Natural Resources, Republic of the Philippines	Paragraph 76	From text as "Marine and coastal habitat degradation and destruction trends were assessed by looking at the % change in agricultural land, which may result in both mangrove conversion and siltation of coral and seagrass habitats, and the extent of activity of bottom trawls and dredging gears, which affects coral and seagrass habitats."	In addition to the given text, marine and coastal habitat degradation and destruction trends may likewise be assessed by looking at the extent and impact of activities such as the live reef fish trade including the illegal extraction and trading of coral and endangered species by both local and foreign entities	Noted
158	Analiza Rebuelta-Teh	Department of Environment and Natural Resources, Republic of the Philippines	Paragraph 127		It can be added that one of the platforms for the CTI Programs is the Sulu-Sulawesi Marine Ecoregion (SSME). The three countries, Indonesia, Malaysia and the Philippines entered into a Memorandum of Understanding (MOU) in 2004 adopting the Ecoregion Conservation Plan (ECP). Further, the CTI Regional Plan of Action (RPOA) has been translated into the National Plan of Action (NPOA) by each of the CT countries	Noted. Achievements in the CTI are not included in the evaluation as it is not part of the SCS and Gulf of Thailand LME. However, some CTI projects have incidence on the SCS and are included in the evaluation portfolio.
159	Analiza Rebuelta-Teh	Department of Environment and Natural Resources, Republic of the Philippines	Chapter VI: Paragraph 153		It is suggested in the text, "damage on its seagrass bed due to a coal vessel grounding" be replaced with "damage on its seagrass bed due to a coal spill incident brought about by a vessel grounding".	The text has been changed as suggested.
160	Analiza Rebuelta-Teh	Department of Environment and Natural Resources, Republic of the Philippines	Paragraph 53	Referring to the text "... Wherein GEF has provided a funding of over US\$9.3 million" and as indicated in Annex 2A Table 1, GEF ID 1185 Cofin. for ICRMP is US\$9.05M."	Per ICRMP Financing Agreement, GEF contribution to ICRMP is US\$9.0 million	Noted and corrected.
161	Analiza Rebuelta-Teh	Department of Environment and Natural Resources, Republic of the Philippines	Paragraph 284	From text "In Baatan (GEF ID 2329), where a non-combustion plant for destroying persistent organic pollutants (POPs) was to be constructed, GEF funding constituted a major part of financing required for total outlay, and was central to the activities undertaken. The project was closed, however, without the facility being built."	The Project was never discontinued and its extension was approved by the GEF until the end of 2012. There were delays in the test run/commissioning, after treatment of low-level PCB in December 2011 and March 2012, due to some technical issues which are being addressed by the PNOG-AFC and IPM/Kinectrics Inc. All remaining works are expected to be completed by October 2012 and will be the basis for the return of Kinectrics Inc. for the resumption of test run/commissioning, steady state operation and finally, to demonstrate the treatment of 1,500 MT of PCB. Further, this was also clarified with UNIDO Headquarters by Dr. Carmela Centeno (September 3, 2012) that the Project is still on-going, the facility was installed and there was initial operation in December 2011.	Noted and corrected.

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162	Analiza Rebuella-Teh	Department of Environment and Natural Resources, Republic of the Philippines	Paragraph 284	From text "In Baatan (GEF ID 2329), where a non-combustion plant for destroying persistent organic pollutants (POPs) was to be constructed, GEF funding constituted a major part of financing required for total outlay, and was central to the activities undertaken. The project was closed, however, without the facility being built."	This report was also mentioned in the Project TWG meeting held on September 10, 2012 wherein the Project Team Members confirmed that no request to visit the Non COM POPs Facility was made by the GEF Evaluation Team	The EO consultant clarified that the verification was done through interview by e-mail, as the infrastructure had not yet been completed at the time.
163	Analiza Rebuella-Teh	Department of Environment and Natural Resources, Republic of the Philippines	Chapter X, Paragraph 26	From text: "In Bataan (Philippines, GEF ID 2329), while reducing toxic airpollution and the transport of hazardous waste from a global perspective, the PCB destruction facility poses the risk of increasing heavy metal pollution in local waters through operation of the facility, as well as through the transport of PCBs from other parts of the country." (pertaining to the negative impacts of the UNIDO-GEF NonCom POPs Project in Bataan)	Clarification: The technology employed is developed by Kinectrics Canada which is a sodium dechlorination and the system is a close-loop therefore no perceived adverse impact on water resources. In addition, prior to the construction and commissioning operation of the facility, a baseline data gathering and monitoring has been conducted and continuously being done until now to ensure that no releases or negative impacts on the soil, water and air. All the important parameters are continuously measured. The possibility of heavy metal pollution is impossible since the facility will be handling organic chemical and solvents during the treatment and decontamination. Heavy metals are inorganic therefore its presence is not likely to occur or be released in the process. The Environmental Management Bureau has prepared the Code of Practice on PCB Management (EMB MC 2009-007) that includes safe handling and transport of PCB. Only trained and accredited personnel are authorized to handle the material.	Noted. Paragraphs deleted.
164	Joint response from PEMSEA Resource Facility (PRF) and EAS Partnership Council (Dated 09.Oct.2012)	PEMSEA Resource Facility (PRF) and the EAS Partnership Council	Chapter I	PEMSEA/SDS-SEA, COBSEA and the South China Sea SAP	This is an issue that has been sidestepped in the Chapter 1. The SCS SAP, which is focused entirely on the South China Sea LME, was approved by a project steering committee (PSC) in 2008, with objections from some countries that any formal discussions or actions on SAP approval and implementation should be done through COBSEA, not the PSC (reference: paragraph 181, draft SCS impact evaluation report). <u>Thus, Chapter 1's reference to the SCS SAP being an example of an important intergovernmental agreement needs to be addressed directly (paragraph 19; paragraph 43).</u> The GEF EO's draft SCS report raised the point that the SCS SAP has yet not reached the status of an intergovernmental agreement.	The evaluation was careful not to use the word "agreement" . The section refers to achievements of GEF support that have contributed to intergovernmental collaboration and cooperation, not just to formal adoption through legal processes.
165	Joint response from PEMSEA Resource Facility (PRF) and EAS Partnership Council (Dated 09.Oct.2012)	PEMSEA Resource Facility (PRF) and the EAS Partnership Council	Chapter I: General Comment	PEMSEA/SDS-SEA, COBSEA and the South China Sea SAP	On the other hand, Chapter 1 rigorously reviews PEMSEA and its operating arrangements and progress as a regional coordinating mechanism for the implementation of the SDS-SEA. We find that similar rigor has not been applied to the SCS SAP, its supposed regional implementing mechanism (COBSEA), and any progress regarding implementation. As confirmed in the draft SCS report, the SCS project was undertaken with minimal operational linkages with COBSEA, resulting in a major gap in confidence in COBSEA's capacity (and willingness) to coordinate the implementation of the SCS SAP (reference paragraph 181, footnote 26, draft SCS report).	The report fully discusses COBSEA in relation to the aims of the SCS TDA-SAP project and progress on the SAP implementation. A more extensive discussion is given on PEMSEA because it has emerged as the most important and currently the only functional mechanism supported by GEF in the region.
166	Joint response from PEMSEA Resource Facility (PRF) and EAS Partnership Council (Dated 09.Oct.2012)	PEMSEA Resource Facility (PRF) and the EAS Partnership Council	Chapter I: General Comment	PEMSEA/SDS-SEA, COBSEA and the South China Sea SAP	However, these important differences between PEMSEA and other regional mechanisms and their SAPs are not considered. Instead Chapter 1, paragraph 19, asserts that GEF has facilitated five important intergovernmental agreements in the SCS, but muddles the distinction between governments and project steering committees, the scope and objectives of the agreements, coordinating mechanisms, and implementation status.	The evaluation was careful not to use the word "agreement". The section refers to achievements of GEF support that have contributed to intergovernmental collaboration and cooperation, not just to formal adoption through legal processes. The evaluation is merely indicating that these are all important accomplishments of GEF support; the value of one accomplishment does not detract from the value of any other.
167	Joint response from PEMSEA Resource Facility (PRF) and EAS Partnership Council (Dated 09.Oct.2012)	PEMSEA Resource Facility (PRF) and the EAS Partnership Council	Chapter I: General Comment	PEMSEA/SDS-SEA, COBSEA and the South China Sea SAP	Follow-on conclusions regarding the scope and cost of PEMSEA's operations are thus largely subjective, without comparison to other mechanisms and with no supporting evidence.	The text has been clarified to emphasize the purpose of the comparison (i.e., the proportion of costs vs. country contributions internal to each regional mechanism, not across regional mechanisms), and the differences between PEMSEA and regional seas bodies. The costs of PEMSEA operations were obtained from PEMSEA's Financial Sustainability Plan and PRF RE-engineering Plan.
168	Joint response from PEMSEA Resource Facility (PRF) and EAS Partnership Council (Dated 09.Oct.2012)	PEMSEA Resource Facility (PRF) and the EAS Partnership Council	Chapter I: General Comment	Country Support for PEMSEA and SDS-SEA Implementation	Paragraphs 45 through 48 paint a picture of PEMSEA as a resource-intensive coordinating mechanism highly dependent on GEF funding for the continuation of its services. The report completely ignores the 10-year transformation plan that PEMSEA and GEF identified in the GEF Project Document for the current project, and the progress that has been made since the project start-up in 2008. The Regional Review of SDS-SEA Implementation 2003-2011, the PRF Re-engineering Plan, PEMSEA's Sustainable Financing Plan, PEMSEA's Advocacy and Communication Plan and the 5-year SDS-SEA Implementation Plan were available to the GEF Evaluation Office, and these spell out the progress, achievements, gaps, strategies and actions for moving PEMSEA towards its goal.	Information on PEMSEA's plans for financial sustainability are acknowledged in the final report.
169	Joint response from PEMSEA Resource Facility (PRF) and EAS Partnership Council (Dated 09.Oct.2012)	PEMSEA Resource Facility (PRF) and the EAS Partnership Council	Chapter I: General Comment	Country Support for PEMSEA and SDS-SEA Implementation	PEMSEA is the only regional mechanism with mandate given by 11 of the 14 countries in the EAS region (Cambodia, China, Japan, DPR Korea, RO Korea, Vietnam, Philippines, Indonesia, Singapore, Lao PDR and Timor Leste) to address sustainable development issues of the Seas of East Asia, through the Ministerial Haikou Partnership Agreement (2006). It is the only regional mechanism that coordinates the implementation of the SDS-SEA. Brunei, Malaysia and Thailand have not signed the Haikou document, but did endorse the SDS-SEA through the Ministerial Putrajaya Declaration in 2003. Thailand fully participates in all activities of PEMSEA and attends the EAS Partnership Council meetings and Ministerial Forums as an observer. Malaysia has not participated in the PEMSEA regional program since 2007; although a local government (Klang) continues to operate within the PEMSEA Network of Local Governments.	Noted
170	Joint response from PEMSEA Resource Facility (PRF) and EAS Partnership Council (Dated 09.Oct.2012)	PEMSEA Resource Facility (PRF) and the EAS Partnership Council	Chapter I: General Comment	Country Support for PEMSEA and SDS-SEA Implementation	It is important to recognize that PEMSEA has evolved into a regional mechanism with its own legal personality as decided and led by countries, not by GEF. Countries recognized that the SDS-SEA is a long-term strategy requiring an efficient regional coordinating mechanism. Such a mechanism must have the mandate and capacity to bring the countries in the region together, and to facilitate, assist and monitor progress toward SDS-SEA objectives and targets at local, national and regional levels.	The report states that PEMSEA has been recognized as an international organization by the countries, not by GEF.
171	Joint response from PEMSEA Resource Facility (PRF) and EAS Partnership Council (Dated 09.Oct.2012)	PEMSEA Resource Facility (PRF) and the EAS Partnership Council	Chapter I: Paragraph 45	Country Support for PEMSEA and SDS-SEA Implementation	It was from this perspective that countries decided to give PEMSEA recognition as an international legal personality. Paragraph 45 makes a number of statements concerning country recognition of PEMSEA's legal personality, and implies a lack of support for PEMSEA among 3 countries bordering the SCS. The fact is that recognition of PEMSEA's legal personality required only 3 signatories including the host government, while 8 countries signed the agreement. Thailand, Singapore and Japan could not commit to completing the arduous process of getting formal approval to sign the agreement within the available timeframe. Thus, the implication that Thailand and Singapore did not sign the agreement because they do not support PEMSEA is incorrect. The other perspective that the GEF EO might consider is that 12 of 14 countries in the Seas of East Asia region, and 6 of 7 countries bordering the SCS are active participants in PEMSEA and SDS-EA implementation.	The evaluation only states the extent of formal support expressed by countries, and flags the risk of having differences in the extent of support from countries in the SCS, which is relevant to broader adoption of PEMSEA as a regional mechanism. The issue of the recognition of PEMSEA's international legal personality by the 8 signatory countries has been resolved in light of the new information provided by PEMSEA.

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172	Joint response from PEMSEA Resource Facility (PRF) and EAS Partnership Council (Dated 09.Oct.2012)	PEMSEA Resource Facility (PRF) and the EAS Partnership Council	Chapter I: Paragraph 45	Country Support for PEMSEA and SDS-SEA Implementation	Paragraph 45 continues. It indicates that by signing the agreement recognizing PEMSEA's legal personality, China, Japan, Korea and the Philippines will not commit to regular financial contributions or being financially liable for PEMSEA. The first error in this statement is that Japan did not sign the subject agreement recognizing PEMSEA's legal personality. The second error is the confusing information concerning legal commitments versus voluntary commitments. The four countries have already signed voluntary agreements to support PEMSEA financially, totaling more than USD400,000 per year. Partnership and volunteerism is PEMSEA's strategy for sustainability, and it has worked well in comparison to other regional mechanisms. For example, SCS countries have not been willing to make legal commitments to support COBSEA's operation, requiring subsidization from UNEP for more than 30 years. PEMSEA, on the other hand, has spun off a number of self-sustaining operations since 2008, and is on target to full sustainability. Paragraph 45 does not acknowledge such innovation and progress, but implies that the old (and unsuccessful) paradigm is preferred.	The sentence has been clarified to avoid misinterpretation: "While four countries (China, Japan, Korea and Philippines) have pledged voluntary contributions towards annual operating costs of PEMSEA, all of the signing countries have indicated that they will not commit to regular financial contributions or be financially liable for PEMSEA. Instead, countries support the approach that each country should make voluntary contributions according to its means." Other examples provided by PEMSEA of country contributions to regional activities and self-sustaining initiatives have been included in Section 11.2 of the final report.
173	Joint response from PEMSEA Resource Facility (PRF) and EAS Partnership Council (Dated 09.Oct.2012)	PEMSEA Resource Facility (PRF) and the EAS Partnership Council	Chapter I: General Comment	Country Support for PEMSEA and SDS-SEA Implementation	PEMSEA would not exist if the countries bordering the South China Sea had agreed during the GEF project formulation phase to allow UNEP/COBSEA to implement the first PEMSEA project. COBSEA would have been further strengthened and enriched with resources if those same countries wanted the GEF/UNEP South China Sea Project to be implemented by COBSEA. The GEF Evaluation Office fails to highlight why this is not the case. If COBSEA was not the obvious alternative for UNEP or the COBSEA member countries, what other regional mechanism had a better mandate at the time?	The constraints on the choice of implementing and executing agencies for both GEF funding streams are explained in Section 6.2 of the final report.
174	Joint response from PEMSEA Resource Facility (PRF) and EAS Partnership Council (Dated 09.Oct.2012)	PEMSEA Resource Facility (PRF) and the EAS Partnership Council	Chapter I: General Comment	Country Support for PEMSEA and SDS-SEA Implementation	Obviously, some countries are skeptical about the functionality and usefulness of regional mechanisms, PEMSEA included. It is normal for them to adopt a "wait and see" attitude. PEMSEA has met the minimum requirement (3 countries) as an international organization so that it now has the international legal personality to receive funding and implement projects. What matters are not additional countries signing on (though they are always welcome) but their participation as partners. Regional cooperation to address transboundary environmental issues requires more than just legal instruments. The spirit of cooperation must be enhanced through partnerships at all levels for both GEF eligible and non-eligible countries.	By indicating that it is obvious that some countries are skeptical about the functionality and usefulness of regional mechanisms you are confirming that a risk exists. PEMSEA documents and communications place a lot of emphasis on agreements and declarations adopted by countries, indicating that this is a measure of the extent of its accomplishments. The evaluation certainly does not disagree that partnership at all levels with all countries is important. The evaluation is particularly concerned with GEF-eligible countries because GEF funds are intended to specifically support these countries, and these are the countries whose political and financial support will be critical once GEF support is withdrawn.
175	Joint response from PEMSEA Resource Facility (PRF) and EAS Partnership Council (Dated 09.Oct.2012)	PEMSEA Resource Facility (PRF) and the EAS Partnership Council	Chapter I: Paragraph 44-48	In paragraphs 44 through 48, the GEF EO has made a number of conclusions regarding PEMSEA's financial sustainability without any facts or evidence to support their suppositions. Here are the facts:	a. Since 2008, national governments, local governments and non-country partners have contributed USD69.7 million in-kind and in-cash co-financing for the operation of PEMSEA and the implementation of the SDS-SEA (Attachment 1). That's more than twice the level of co-financing committed to in the Project Document. b. China, Japan and RO Korea have provided in-cash support for the operation of the PRF secretariat, totaling USD 1.9 million since 2008. The Philippines hosts the PRF, and provides access to the PEMSEA Office Building, utilities and amenities at no charge. This is conservatively valued at USD42,000 per year. Timor Leste, since 2010, has provided an in-cash contribution to PEMSEA of USD100,000 per year. This contribution is employed to support capacity building in Timor Leste. c. These in-cash and in-kind contributions have facilitated the implementation of the first stage of the approved PRF Re-engineering Plan, namely the transfer of 4 core posts (i.e., PRF Executive Director; Executive Assistant; Secretariat Coordinator; and Program Support) from the GEF-funded financial account to the country-funded financial account. The PRF Re-engineering Plan calls for two more core posts to be transferred to the country-funded account (i.e., Head of Finance, Administration and Personnel; Head of Planning and Partnership Development). d. PEMSEA, as an organization, is committed to achieving the transfer of all PRF core posts to the country-funded financial account by the end of the current GEF project, i.e., December 2013, through voluntary support from partners. The PRF Re-engineering Plan assesses the cost of PRF Core Group operation (i.e., management, administration, secretariat services) at approximately USD700,000 per annum (reference PRF Re-engineering Plan). At present, in-kind and in-cash voluntary contributions total a little more than USD400,000 per annum, leaving a budgetary shortfall of USD300,000 per annum. PEMSEA's Executive Committee and the PRF are working closely with countries to meet the objective of self-sustainability, within the timelines agreed to in the PRF Re-engineering and PEMSEA Sustainable Financing Plans. Starting in 2014 (i.e., the start of the final phase of GEF support to the regional program), PEMSEA Partners are expected to shoulder all costs associated with the PRF Core Group operations. e. The PRF Re-engineering Plan recommends that the Project Implementation Group operation for project development	The evaluation acknowledges and has included additional information in the report on country contributions and PEMSEA's plans for financial sustainability. It also points out the risks that GEF needs to consider for the next phase of the project. The evaluation's final recommendation to Council is consistent with the notion of full cost recovery by the end of the next GEF project. The recommendation also proposes to put into place measures to ensure that such cost recovery gradually takes place.
176	Joint response from PEMSEA Resource Facility (PRF) and EAS Partnership Council (Dated 09.Oct.2012)	PEMSEA Resource Facility (PRF) and the EAS Partnership Council	Chapter I: Paragraph 44-48	In paragraphs 44 through 48, the GEF EO has made a number of conclusions regarding PEMSEA's financial sustainability without any facts or evidence to support their suppositions. Here are the facts:	The next (and final) phase of GEF support for the PEMSEA regional program (2014 to 2018), has been outlined in the GEF/UNDP Program Framework Document (PFD) entitled, Reducing Pollution and Rebuilding Degraded Marine Resources in the East Asian Seas through Implementation of Intergovernmental Agreements and Catalyzed Investments. The PEMSEA portion of the PFD has an indicative budget of USD10.14 million and consists of 3 main outcomes, namely: a) political commitment to improved coastal and ocean governance and an ocean-based blue economy at the regional and national levels; b) ICM programs covering 20 percent of the coastline and affecting changes in sustainable development and climate change adaptation at the local level; and c) a knowledge platform and network promoting and facilitating increased investments by the public and private sectors in sustaining coastal and marine ecosystem services and building a blue economy in the Seas of East Asia. The indicative co-financing from national and local governments is USD76.4 million, (i.e., national USD22 million; local USD54.4 million) based on initial discussions with the concerned governments. This level of interest suggests that countries appreciate PEMSEA's approach to collaborative planning and development of projects in support of SDS-SEA implementation, and the rollout of a full cost recovery approach for PRF products and services.	This document was not provided to the EO until September 9, 2012 despite previous requests. Additional information has been included in the final report.

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177	Joint response from PEMSEA Resource Facility (PRF) and EAS Partnership Council (Dated 09.Oct.2012)	PEMSEA Resource Facility (PRF) and the EAS Partnership Council	Chapter I: Paragraph 44-48	In paragraphs 44 through 48, the GEF EO has made a number of conclusions regarding PEMSEA's financial sustainability without any facts or evidence to support their suppositions. Here are the facts:	The EAS Congress is one of four major elements that comprise PEMSEA as a regional mechanism.(EAS Partnership Council, PRF and Regional Partnership Fund are the other three, as defined in the Haikou Partnership Agreement). The triennial Congress is a regional "coasts and oceans" event that is organized for the purpose of reviewing progress, achievements, trends and gaps in SDS-SEA implementation, sharing knowledge, and strengthening partnerships. In 2009, the Philippines hosted the Congress and in 2012 the Republic of Korea. The in-kind and in-cash support committed by the two host governments, which included rental of the Congress venues, logistical support, security, hosting of Ministers Forum, etc., totaled more than USD2.5 million. More than 30 sponsors and co-convening partners were responsible for co-organizing workshops and supporting Chairpersons, speakers, resource persons, youths and participants from developing countries, providing in-kind and in-cash contributions of more than USD1 million. With this level of support, the EAS Congress has transformed from a GEF-financed, project-oriented event into a self-sustaining regional partnership event. Net revenues from the previous Congresses have provided PEMSEA with sufficient capital (USD200,000) for planning and start-up of subsequent Congresses, which is then recovered through registration fees. In addition, countries are showing their support for this approach by volunteering to host the EAS Congress 2015 and subsequent Congresses	Noted. PEMSEA's self-sustaining initiatives contributing to regional services are acknowledged in Section 11.2 of the final report.
178	Joint response from PEMSEA Resource Facility (PRF) and EAS Partnership Council (Dated 09.Oct.2012)	PEMSEA Resource Facility (PRF) and the EAS Partnership Council	Chapter I: Paragraphs 44-48	In paragraphs 44 through 48, the GEF EO has made a number of conclusions regarding PEMSEA's financial sustainability without any facts or evidence to support their suppositions. Here are the facts:	Other components of the PEMSEA regional program that have been transformed into self-sustaining operations include: the PEMSEA Network of Local Governments (PNLG) and the PNLG Secretariat; Xiamen World Ocean Week; 7 ICM Learning Centers; PEMSEA Regional Center of Excellence; and PEMSEA Integrated River Basin and Coastal Area Management Twinning Secretariat. Each of these self-sustaining operations started as GEF-supported initiatives under the PEMSEA regional program, but have since transitioned into self-sustaining operations within the PEMSEA governance framework. This entails commitments at various levels, for example: - PNLG members (note there are currently 31 local government members in the PNLG) take turns hosting the annual forum and workshop, including meals and accommodation for representatives from each of the other local government members. This translates into a cost of USD25,000 to USD50,000 per year, depending on the venue for the annual PNLG Forum. In addition, each PNLG member pays an annual fee of USD500 toward the operation of the PNLG Secretariat. - Xiamen local government hosts the PNLG Secretariat, where office space and amenities are provided for secretariat services. Four local staff have responsibilities in support of services to the PNLG, in addition to their responsibilities to the local government. Xiamen also provides an in-cash contribution to the PNLG operation of USD10,000 per annum. - Xiamen World Ocean Week has evolved into an annual event of international recognition, similar to the Stockholm World Water Week. The organization and conduct of the event is funded by the local government with annual commitments of approximately USD400,000. - Eight ICM Learning Centers have been established to provide training and technical support to local governments implementing ICM programs in 6 countries across the region. The Centers, which are located in universities with active coastal and ocean-management programs, generate external sources of funding to support their ICM activities, in partnership with PEMSEA. Since 2008, these ICM Learning Centers have been mobilized for national ICM training and special skills workshops, including provision of resource persons and venues for training. - The Regional Center of Excellence has partnered with PEMSEA, namely the Center of Marine Environmental Research. The above-indicated progress gives PEMSEA confidence that it is on track. Although financial sustainability has not been achieved at present, significant progress has been made towards that goal in the last 5 years. PEMSEA Partners are confident that they will achieve financial sustainability for the organization before 2018, the scheduled completion date of the 10-year transformation plan as originally crafted by PEMSEA and GEF.	Noted. PEMSEA's self-sustaining initiatives contributing to regional services are acknowledged in Section 11.2 of the final report. Nonetheless, it should also be mentioned that GEF through PEMSEA continues to provide critical funding support through country allocations, which has implications for the sustainability of PEMSEA. The evaluation has evidence on only two learning centers, Xiamen which has been very successful, and Danang. Government officers in Hanoi and the ICM coordination unit in Danang both indicated that the Danang learning center had not received the necessary financing from the central government. It was also reported that the training center had no budget, no staff, and that training was mainly carried out by ICM coordination unit staff with some participation from the university faculty.
179	Joint response from PEMSEA Resource Facility (PRF) and EAS Partnership Council (Dated 09.Oct.2012)	PEMSEA Resource Facility (PRF) and the EAS Partnership Council	General Comment		The Regional Center of Excellence has partnered with PEMSEA, namely the Center of Marine Environmental Research. The above-indicated progress gives PEMSEA confidence that it is on track. Although financial sustainability has not been achieved at present, significant progress has been made towards that goal in the last 5 years. PEMSEA Partners are confident that they will achieve financial sustainability for the organization before 2018, the scheduled completion date of the 10-year transformation plan as originally crafted by PEMSEA and GEF.	Noted
180	Joint response from PEMSEA Resource Facility (PRF) and EAS Partnership Council (Dated 09.Oct.2012)	PEMSEA Resource Facility (PRF) and the EAS Partnership Council	Paragraph 40 and 61	Social Risks, Relocation, Resettlement and Zoning	Paragraph 40 and Recommendation 4, Paragraph 61, specifically single out PEMSEA for not taking into consideration social risks with respect to relocation and resettlement issues arising from coastal zoning and ICM program. The allegation is that by just following national policies, PEMSEA did not apply international standards in the ICM process and hence violated GEF policy PL/SD/O1.	A response from PEMSEA (May 2012) to the EO's request for documentation of PEMSEA's procedures or guidelines for resettlement states that: "PEMSEA applies ICM principles and procedures in governance and sustainable development of coastal and marine areas and resources. ... PEMSEA does not prepare generic guidelines for the sake of having a guideline. There are many guidelines of this nature available in the region, and internationally. ... Rather than develop generic guidelines and procedures, PEMSEA utilizes available information and experience from among its member countries, and from outside of the region if necessary, to provide guidance and technical assistance to local governments in countries that do not have the necessary capacities." At that time, only information regarding Sihanoukville was provided; new information provided here by PEMSEA is included in the final report. The evaluation flags the risk that these past practices may not have met international standards, and raises the importance of adhering to social safeguard policies in future projects.

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181	Joint response from PEMSEA Resource Facility (PRF) and EAS Partnership Council (Dated 09.Oct.2012)	PEMSEA Resource Facility (PRF) and the EAS Partnership Council	Chapter X: Paragraphs 23-24	Social Risks, Relocation, Resettlement and Zoning	The GEF EO draft SCS report referenced cases in Danang and Xiamen (Chapter 10, Paragraphs 23 and 24). However, what the GEF EO has not realized is that when zoning is applied as part of ICM, it engages concerned stakeholders in an active participatory process to establish the zoning scheme to address existing conflicting uses. It further seeks to build consensus on desired changes and conditions for resettlement of those being negatively affected by the zoning process. This occurred in Xiamen and Danang, where the process has been quite extensive and transparent. Looking at the case of Xiamen for example, the decision to move the cage and oyster farming from the western channel entailed extensive scientific and social studies. The rationale behind the decision was based on the following: a) the fish cages and rafts were simply too congested and were blocking navigational traffic, often resulting in disputes between fish farmers and ship operators and sometimes with fatality; b) the action to move the fish farmers out of the navigational channel was part of a larger functional sea-use zoning plan to ensure orderly development of economic sectors, including tourism, and for the purpose of ecological revitalization of the sea area; c) excessive aquaculture practices in the sea area had resulted in serious environmental degradation; and d) consultations conducted with the standing ICM expert team and stakeholders resulted in a consensus on the functional zoning plan and the compensation scheme. The fish farmers, who were asked to retreat from their practices in the western channel, were given compensation and opportunity to move on to designated aquaculture sites in the surrounding areas of Xiamen. Those farmers who wished to get out of the aquaculture business were given opportunity of retraining for other employment/livelihoods. Only a few fish farmers chose to continue fish farming. Most fish farmers gave up aquaculture and engaged in alternative livelihoods provided by the Xiamen government. At present, there are very few aquaculture practices in the Xiamen sea area. There are no reports of negative social complications arising from those fish farmers who moved to the new sites, nor impacts on the people living around these areas, as alleged. It is evident that additional aquaculture practices in the designated areas could represent a risk of increased pollution. But, in fact, only few fish farmers actually moved to the designated aquaculture areas, which did not result in environmental damages to the areas.	A response from PEMSEA (May 2012) to the EO's request for documentation of PEMSEA's procedures or guidelines for resettlement states that: "PEMSEA applies ICM principles and procedures in governance and sustainable development of coastal and marine areas and resources. ... PEMSEA does not prepare generic guidelines for the sake of having a guideline. There are many guidelines of this nature available in the region, and internationally. ... Rather than develop generic guidelines and procedures, PEMSEA utilizes available information and experience from among its member countries, and from outside of the region if necessary, to provide guidance and technical assistance to local governments in countries that do not have the necessary capacities." At that time, only information regarding Sihanoukville was provided; new information provided here by PEMSEA is included in the final report. The evaluation flags the risk that these past practices may not always have met international standards, and raises the importance of adhering to social safeguard policies in future projects.
182	Joint response from PEMSEA Resource Facility (PRF) and EAS Partnership Council (Dated 09.Oct.2012)	PEMSEA Resource Facility (PRF) and the EAS Partnership Council	Chapter X: Paragraphs 23-24	Social Risks, Relocation, Resettlement and Zoning	Moreover, Xiamen has an extensive water quality monitoring program including a number of monitoring buoys in Xiamen sea area. The Xiamen Municipal Government continuously monitors environment quality in the Xiamen seas. According to the water quality monitoring data, water quality in some areas improved after the aquaculture practices were discontinued. Specifically, the concentration of phosphate has decreased, while the frequency of algal bloom has been reduced in the Xiamen western sea area.	The report notes that stress reduction occurred in Xiamen. However, it raises the importance of addressing environmental issues at a larger scale to avoid the risk of impacts merely being transferred to other areas.
183	Joint response from PEMSEA Resource Facility (PRF) and EAS Partnership Council (Dated 09.Oct.2012)	PEMSEA Resource Facility (PRF) and the EAS Partnership Council	Chapter X: Paragraphs 23-24	Social Risks, Relocation, Resettlement and Zoning	In the case of Danang, the story is similar. Fisher folk that moved out of the area zoned for tourism were part of the participatory process. They were provided compensation and improved housing in a coastal area zoned for fishing.	Additional information included. The evaluation flags the risk that these past practices may not always have met international standards, and raises the importance of adhering to social safeguard policies in future projects.
184	Joint response from PEMSEA Resource Facility (PRF) and EAS Partnership Council (Dated 09.Oct.2012)	PEMSEA Resource Facility (PRF) and the EAS Partnership Council	Chapter X: Paragraphs 23-24	Social Risks, Relocation, Resettlement and Zoning	The GEF EO did not bother to consider the processes that were undertaken at both sites, nor did it identify which international standard(s) had been violated as a consequence of the national process and policy. Certainly if national policies are reasonable and doable, why should they not be followed? Thus the statement and recommendation of the GEF Evaluation Office are without foundation and factually incorrect.	In PEMSEA's May 2012 response when GEF requested the information, only the example of Sihanoukville was provided; new information provided here by PEMSEA is included in the final report. The evaluation flags the risk that these past practices based solely on national policies may not always have met international standards, and raises the importance of adhering to social safeguard policies in future projects.
185	Joint response from PEMSEA Resource Facility (PRF) and EAS Partnership Council (Dated 09.Oct.2012)	PEMSEA Resource Facility (PRF) and the EAS Partnership Council	Chapter X: Paragraphs 23-24	Social Risks, Relocation, Resettlement and Zoning	Unfortunately, the GEF Evaluation Office failed to report a very remarkable public action taken in 2007 by the Xiamen people and the society at large against a government decision to allow a mega petrochemical project in the Xiamen coastal area. After 3 years of demonstration with more than 3000 people protesting in the street, the mega project was finally withdrawn and moved away from Xiamen (note such information are available in the internet). This was a result of ICM and the strength of transparency and participation the project had tried very hard to promote.	This was already in Chapter VIII of the draft report. Additional information has been included.
186	Joint response from PEMSEA Resource Facility (PRF) and EAS Partnership Council (Dated 09.Oct.2012)	PEMSEA Resource Facility (PRF) and the EAS Partnership Council	Chapter I: Paragraphs 32 - 36	Concept and practice of ICM and ICM scaling up	Paragraphs 32 to 36 focus on conditions for replication, scaling up and mainstreaming GEF-supported initiatives in the SCS region, and primarily PEMSEA's ICM approach. While the paragraphs reflect a general appreciation for the outcomes of ICM demonstration projects, some conclusions and observations reflect a lack of understanding of the concept and practice of ICM. The GEF EO points out that: i) implementation of ICM in 14 provinces in Vietnam met with capacity problems and that the conditions for broader adoption were not there; ii) Sriracha in the province of Chonburi has been successful but scaling up ICM to 99 municipalities in the Province faces the classic upstream/downstream dilemma. The GEF EO needs to understand that GEF funds were used to support local initiatives on a cost-sharing basis in six countries to develop ICM demonstration sites. The purpose was to demonstrate the complexity of managing coastal governance issues at ground level. The results provided examples of integrated planning and management under different local political, socioeconomic and cultural conditions, addressing complex and complicated sustainable development issues. The strategy was to enhance the interest and understanding of national and local governments of the ICM model for coastal management. This was important, as the 8 national ICM demonstration projects were implemented against a background of many failures in donor-funded coastal resource management projects in several countries in the region. The demonstrations promoted wider national and local government interest across the region as indicated by several national coastal policies, presidential decrees and ICM legislations. However, this does not mean that all the national and local efforts that duplicate the PEMSEA ICM model will achieve the same level of success within the same timeframe, considering the expertise and financial resources available to them. Indeed, there are some successes and some less successful initiatives. As replication is a government initiative and some sites were implemented with other donor support, the discrepancy reflects the need to develop more local capacity with adequate knowledge and hands-on experience in ICM.	Noted. The evaluation is making the point that there are strengths and weaknesses to the approaches supported by GEF, that conditions for broader adoption are different from case to case, and that GEF should take this into account when choosing further sites to support, such as for the development of local capacity.
187	Joint response from PEMSEA Resource Facility (PRF) and EAS Partnership Council (Dated 09.Oct.2012)	PEMSEA Resource Facility (PRF) and the EAS Partnership Council	General Comment	Concept and practice of ICM and ICM scaling up	Conditions for broader adoption of ICM vary from site to site and country to country. However the boundary conditions for the application of ICM remain and the ICM dynamics allow a good ICM practitioner to adapt the ICM governance and management framework under different conditions. One should not expect "one size fits all". That is the reason why PEMSEA has placed considerable emphasis in building local capacity. However, PEMSEA's efforts are not adequate to cope with the increasing demand. When ICM approach is accepted by the political leadership, the tendency is to rapidly scale up ICM, as has been the case in the Philippines, Indonesia and Vietnam.	The EO agrees on the central points, including that a "one size fits all" approach is not appropriate. This also why the evaluation points the need for GEF's fuller use of the various distinctive competencies within the GEF Partnership.

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188	Joint response from PEMSEA Resource Facility (PRF) and EAS Partnership Council (Dated 09.Oct.2012)	PEMSEA Resource Facility (PRF) and the EAS Partnership Council	General Comment	Concept and practice of ICM and ICM scaling up	As a consequence, the current PEMSEA technical staff are being spread across a number of countries to cover the demand from all the participating countries. This is not sustainable, and other means are being developed, including regional and national task forces and ICM Learning Centers. This is the type of operating cost that the GEF EO has neglected in its review of PEMSEA. The fact is GEF support is needed for building such capacity at the national level to meet the increasing demand and ensure sustainability.	The evaluation mentions all these important accomplishments in Chapter 6. Additional information on regional and national task forces has also been included in Section 11.1 of the final report.
189	Joint response from PEMSEA Resource Facility (PRF) and EAS Partnership Council (Dated 09.Oct.2012)	PEMSEA Resource Facility (PRF) and the EAS Partnership Council	Chapter XI: Paragraph 14	from text: "In Thailand, the ICM experience that started in the municipality of Sriracha in the province of Chonburi has gone in the direction of scaling-up, GEF-supported demonstration activities through the UNDP/PEMSEA stream started in Sriracha shortly after a new decentralization policy was passed, granting the local governments more responsibility in managing their natural resources. ICM activities initially focused on five local government units (LGU) in the vicinity of the Sriracha Port. These units were selected primarily because of their history of collaboration, financial resources, and relatively strong institutions. These LGUs developed an integrated coastal management strategy in 2001, which was adopted in 2004. Scaling up allowed the LGUs to share wastewater treatment facilities and therefore collectively cut costs. LGU officials consider that the main impact of ICM is that economic growth in the Chonburi coast without ICM would have taken place without the environmental dimension being considered."	Paragraph 35 mistakenly describes Sriracha, Thailand, as a local government with strong initial human resources, institutional and financial capacities, while upland municipalities lack similar advantages. In fact, when the ICM program started in Sriracha in 2001, the municipality lacked human, institutional and financial resources. It was basically a fishing community of about 35,000 people. It was quite dissimilar to Xiamen and Batangas. Thus, the success of Sriracha's ICM program and its influence on neighboring municipalities, and eventually Chonburi Province, to scale up ICM has many valuable lessons.	While Sriracha may have started out smaller than Xiamen or Batangas, its economic growth as one of the beneficiaries of Thailand's Eastern Seaboard project, and new decentralization laws resulted in a robust resource base for the municipality.
190	Joint response from PEMSEA Resource Facility (PRF) and EAS Partnership Council (Dated 09.Oct.2012)	PEMSEA Resource Facility (PRF) and the EAS Partnership Council	Chapter XI: Paragraph 13 and 14	Concept and practice of ICM and ICM scaling up	Chonburi Province is at an early stage of scaling up the ICM program, with coverage of both coastal and non-coastal local governments. This is a challenging task. The advantage for Chonburi is the successful example of Sriracha, which has attracted non-coastal municipalities to adopt the ICM governance model. The scaling up initiative is the commitment of these local governments; it has not been a top-down approach. It should also be emphasized that PEMSEA and GEF do not provide financial support for scaling up, but rather provide access to training, networking with other local governments and technical assistance through ICM Learning Centers, as a means of guiding the scaling up process. PEMSEA is also testing an ICM Code and Recognition system, as an incentive to local governments to develop and implement ICM in conformance to a recognized standard.	The Evaluation Office found that LGUs in coastal areas have conditions that are more receptive for broader adoption. Not so the conditions inland LGU which are facing important fiscal constraints and nonpoint source agricultural pollution problems which are much more difficult to address than those related to municipal waste water treatment (for example). Again it is here where approaches being proposed by other GEF partners make sense, such as working with at the national level regulations and introduction of new farm technologies.
191	Joint response from PEMSEA Resource Facility (PRF) and EAS Partnership Council (Dated 09.Oct.2012)	PEMSEA Resource Facility (PRF) and the EAS Partnership Council	General Comment	ICM Tools: IIMS and SOC	Paragraphs 54 to-55 and paragraph 68 discusses two tools developed by PEMSEA and applied in ICM programs, namely the Integrated Information Management System (IIMS) and the State of the Coasts (SOC) reporting system. The GEF EO has recognized the usefulness of the information gathering, management and reporting systems, but the criticism is that these tools are too complicated and have limited application at local level. Admittedly, IIMS is a comprehensive tool involving multi-sector data gathering, management and use. It requires IT skills to prepare and use the IIMS as a support system for management decisions and actions. The IIMS has proven to be effective tool in support of environmental management of Manila Bay. It has been adopted by the Philippines' Department of Environment and Natural Resources for application throughout the country. At present, 18 priority coastal areas and river basins have been identified in the country for IIMS rollout.	Additional information on use of IIMS by Manila Bay included
192	Joint response from PEMSEA Resource Facility (PRF) and EAS Partnership Council (Dated 09.Oct.2012)	PEMSEA Resource Facility (PRF) and the EAS Partnership Council	General Comment	ICM Tools: IIMS and SOC	The IIMS is intended to be used by local governments implementing ICM programs. Local governments need to build their technical capacities in ICM development and implementation. Monitoring, data gathering, data use and reporting are key aspects of good governance. PEMSEA does not agree that, because it is challenging for local governments, we should be promoting something less useful. The real challenge is to strengthen local government capacity and make IIMS more popularly used, which will take some time.	The EO does not indicate that PEMSEA should promote something less useful, merely that GEF support should focus on initiatives that realistically consider local conditions and specifically receptive capacities, make more use of new, user-friendly ICT and, in this case, possibly take a phased approach.
193	Joint response from PEMSEA Resource Facility (PRF) and EAS Partnership Council (Dated 09.Oct.2012)	PEMSEA Resource Facility (PRF) and the EAS Partnership Council	General Comment	ICM Tools: IIMS and SOC	The same applies to the SOC reporting system. The SOC is a relatively new reporting format developed and adopted by PEMSEA for use by local governments implementing ICM programs. It has 35 performance indicators for governance, social and economic development, as well as environmental trends and changes. Not all local governments can provide data on the 35 indicators the first time the SOC is applied, and they are not required to do so. However, local governments that see the value of the 35 indicators, over time, are able to extend their monitoring programs to cover identified gaps. Again, this is not a short-term process, but one that is designed to serve local governments, and their desire to move toward sustainable development targets. A case in point is the Province of Guimaras in the Philippines. Despite being one of the poorest provinces in the country, it is amongst the early local governments to complete and apply the SOC reporting system in developing its long-term sustainable development strategy and implementation plan.	See response above
194	Eom Ki-Doo, Director of Marine Environment Policy Division	Ministry of Land, Transport and Maritime Affairs, Republic of Korea	Chapter XI: Paragraph 37	From text "It is also not clear if the conditions have been met for the agreement to come into force. The agreement states that it "shall enter into force on the date on which at least three Parties, including the Host Country, have expressed their consent to it". This consent "may be expressed by signature, ratification or accession", subject to the each country's internal legal requirements. Although 8 countries signed the agreement in 2009 (4 of which do not border the SCS), it is unclear how many have given their formal consent as required except for the host country, the Philippines. Also, the Agreement Recognizing the International Legal Personality of PEMSEA specifies that countries have no obligation to provide any form of financial contributions or support to PEMSEA, or to guarantee PEMSEA's liabilities."	We have gone through rigorous internal legal process to ratify the agreement recognizing the international legal personality of PEMSEA which took several months. In this effect, we request that this underlined sentence should be changed to "it is unclear how many have given their formal consent as required except for the Philippines and the Republic of Korea". Other paragraphs such as 36 and 38 are also misleading and biased statements.	The EO did not intend to mislead or make biased statements, or negate the efforts of countries in providing support to PEMSEA. The report simply stated that from the text of the agreement, it was not immediately clear which of the signing countries had met the conditions for the agreement to come in to force. This information was requested by Aaron Zazueta to Raphael Lotilla in an email on December 1, 2011. The reply by Mr. Lotilla did not sufficiently clarify the conditions. The explanation of the process followed prior to signature of the agreement which is now provided by PEMSEA, China and RO Korea provides sufficient evidence that the conditions were met, thus this text is not included in the final report of the evaluation. The EO understands the sensitivity of the subsequent statements and has made modifications to the text.

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195	Zhang Zhanhai	Department of International Cooperation, State Oceanic Administration, The People's Republic of China	Chapter XI: Paragraph 37	From text "It is also not clear if the conditions have been met for the agreement to come into force. The agreement states that it "shall enter into force on the date on which at least three Parties, including the Host Country, have expressed their consent to it". This consent "may be expressed by signature, ratification or accession", subject to the each country's internal legal requirements. Although 8 countries signed the agreement in 2009 (4 of which do not border the SCS), it is unclear how many have given their formal consent as required except for the host country, the Philippines. Also, the Agreement Recognizing the International Legal Personality of PEMSEA specifies that countries have no obligation to provide any form of financial contributions or support to PEMSEA, or to guarantee PEMSEA's liabilities."	The sentence "it is unclear how many have given their formal consent as required except for the host country, the Philippines" in the paragraph implies very irresponsible conclusion which is not the case for us. It took us a lot of efforts to go through the internal procedure, for inter-agency consultation e.g. the Ministry of Foreign Affairs, Ministry of Finance which is the ministry responsible for GEF affairs, all of those inter-agency consultation took us several months to complete the procedure to ratify the agreement recognizing the legal personality of PEMSEA. Although the Agreement recognizing the International Legal Personality of PEMSEA specifies that countries have no obligation to provide any form of financial contribution or support to PEMSEA, or to guarantee PEMSEA's liabilities, China beginning from 2006, has been contributing financially together with other partner members to PEMSEA every year by a amount of one million RMB to support the operations of PEMSEA. This strongly embodies the importance and support that China attaches and gives to PEMSEA. Thus, we formally require the above paragraph to be corrected accordingly.	The report stated that from the text of the agreement, it was not immediately clear which of the signing countries had met the conditions for the agreement to come in to force. This information was requested by Aaron Zazueta to Raphael Lotilla in an email on December 1, 2011. The reply by Mr. Lotilla did not sufficiently clarify the conditions. The explanation of the process followed prior to signature of the agreement which is now provided by PEMSEA, China and RO Korea provides sufficient evidence that the conditions were met, thus this text is not included in the final report of the evaluation.
196	Zhang Zhanhai	Department of International Cooperation, State Oceanic Administration, The People's Republic of China		From text "In Xiamen (China, GEF ID 396/597/2700), aquaculture farmers and developers had to be relocated to protect mangroves and to construct a shipyard. Compensation was given to affected parties after some negotiation, a three-year phase-out period was given for the aquaculture farmers to relocate, and alternative sites for development were provided. However, while these changes significantly improved water quality at the site, the alternative sites that received the aquaculture farms consequently became highly polluted. In this case, it has increased the costs for stakeholders who were not beneficiaries of the demonstration. This is one very concerning negative socioeconomic impact that emerges from implementing a demonstration in one site without addressing the problem at the larger scale (Mee 2010, Lau 2005, GEF EO 2004)."	This is not true and the reason for this is as followed, which has been provided by the Xiamen Ocean and Fishery Bureau. "The fish farmers who were asked to retreat from practice in the western channel were given compensation and opportunity to move on to designated aquaculture sites in the surrounding cities of Xiamen and those who wished to get out of aquaculture practices were given opportunity in other employment opportunities. Only few fish farmers chose to keep aquaculture in those designated areas, most of the fish farmers gave up aquaculture and engaged in alternative livelihood provided by Xiamen government. Now there is no aquaculture in Xiamen sea area. There are no reports of negative social complications arising from those fish farmers who moved to the new sites nor on the people living around there as alleged. It is true that additional aquaculture practices in the designated area could give rise to some pollution, but there are only few fish farmers moved to the designated aquaculture areas in the surrounding cities, which would not bring environmental problems to the areas basically. Xiamen has an extensive water quality monitoring program including a number of buoys in Xiamen sea area, through which Xiamen Municipal Government could understand the environment of Xiamen seas. According to the water quality monitoring data, the environment in some areas was improved after aquaculture being cleaned out. For example, the concentration of Phosphate is decreased, the frequency of algal bloom is obviously reduced in Xiamen western sea area. The Xiamen Government has reported that there are relatively less environmental problems arising from aquaculture in Xiamen now than ever before, let alone social problem. Thus the statement of the GEF Evaluation Office is factually incorrect. Therefore we request your office to reconsider the above description in that paragraph."	Based on this new information, the text has been modified to: "The State Oceanic Administration of China has provided information that due to the alternative livelihood opportunities given to the aquaculture farmers, only a few chose to continue their aquaculture activities in the relocation area, and no negative social complications have been reported either by those farmers or by the people at the relocation site. However, as the demand for aquaculture continues to increase in the country, the development of new aquaculture farms elsewhere to compensate for the ones that have been eliminated in Xiamen poses the risk of increasing the ecological and health costs for stakeholders beyond the geographical scope of the demonstration site." The evaluation raises the importance of addressing environmental issues at a larger scale (the SCS) to avoid the risk of impacts merely being transferred to other areas affecting the water body targeted by GEF support.
197	World Bank Task Team consolidated comments	World Bank	General Comment	Programming Context	The draft report may want to further clarify how GEF IW programming practices have shaped the IW portfolio of key agencies in the region. Specifically, requirements on cofinancing from Bank loans since GEF IV have limited the chances of Bank managed GEF projects to work with national governments, and thus limited the potential impacts of Bank projects at the national level.	This has been included in the recommendations in Chapter 1 of the final report.
198	World Bank Task Team consolidated comments	World Bank	General Comment	GEF Positioning	The evaluation has raised a very good question on GEF positioning in its engagements in the region on IW issues. The Bank will urge the evaluation report to deepen the analysis on this topic. Such analysis will benefit the strategic planning of GEF VI and beyond on how limited GEF resources could be better used to help countries in the region address IW issues effectively and efficiently.	Strategic partnerships within GEF are more extensively discussed in Chapter 7 of the final report.
199	World Bank Task Team consolidated comments	World Bank	General Comment	Diluted Support	The Bank agrees to the report's finding that GEF support to multiple regional mechanisms has created multiple dependent regional entities with their long-term sustainability at question. The Bank will urge the evaluation to further examine how these regional mechanism worked with the countries in carrying out their activities. A question is worth examine is whether working with non-economic sectors/ministries (such as ministries of environment) may reduce the efficiency of such schemes, and thus of the GEF resources, to address the fundamental causes of IW issues, be it ICM or pollution management.	This has been included in the recommendations in Chapter 1 of the final report.
200	World Bank Task Team consolidated comments	World Bank	General Comment	Project Monitoring vs. Long Term Monitoring	Note that project monitoring for investment projects on new treatment technologies is used to verify the actual performance of the new technologies. This explains why some of Bank managed GEF projects have not required specific requirements on long term monitoring after project completion.	Noted.
201	World Bank Task Team consolidated comments	World Bank	General Comment	Conclusion Chapter	The Bank will appreciate if the draft of the Conclusion Chapter could be shared before the finalization of the report.	Although the Office received the Bank comments in November and therefore was not able to consider them in the drafting of the final report, the Bank was able to review the Conclusions through the GEF Secretariat.
202	World Bank Task Team consolidated comments	World Bank	Paragraph 187	PEMSEA/WB cooperation	The tone of this paragraph could be more positive, highlighting that there are frequent and constructive communications between PEMSEA and the World Bank which help inform country and regional dialogue on both sides. While this may be difficult to evaluate in terms of impact, it is seen as a very useful and positive aspect of the GEF support under which this dialogue between the WB and PEMSEA has developed.	Noted, and included in Chapter 7 of the final report.
203	World Bank Task Team consolidated comments	World Bank	Chapter X: Paragraph 22	From text : 'The joint sewage-septage treatment plant still being constructed in Manila (Philippines, GEF ID 2759) will require user fees resulting in 50% higher water charges for households. It is unclear if this has already been consulted with and accepted by affected households.'	This statement is not accurate. This GEF project alone will not require the increase of users fees by 50%. The entire sanitation investments in Metro Manila, which consists of 30 + STP and sewerage investments to be financially assisted by various donor and private sector groups for the next 25 years is substantial. This will push the users fee higher and not the joint sewage-septage treatment plant alone. The GEF proj. funded the rate rebasing exercise for the govt. to determine different scenarios on the tariffs given the huge investments required for this sector. There were consultations done in the past to get their sentiments that is why the planned 50% increase in the users' fees have not materialized since their concerns were considered.	Revised in Chapter 10 of the final report.
204	World Bank Task Team consolidated comments	World Bank	Paragraph 155	From text: 'While the project outputs were mostly delivered, the main project objective of ensuring coordinated and sustainable water management in the Mekong was not achieved'	This is too categorical statement, and in fact, the Bank team has been contesting the IEG. In our task team's view, this should be rewritten as follows: "The project outputs were mostly delivered, and particularly, the DSF has been utilized as a foundation for the four MRC member countries to understand the transboundary nature of hydrology of the Mekong River, and procedures for the notification, prior consultation and agreement has been used to process the proposed first dam in the mainstream of the lower Mekong river."	Revised in the final report.
205	World Bank Task Team consolidated comments	World Bank	Paragraph 172	From text: 'As it turned out, none of the parties were willing to follow the proposed scientific criteria for water utilization to evaluate projects'	There is no evidence to substantiate this sentence and we suggest that this should be deleted. The Bank's not aware that the project has formally proposed any scientific criteria to evaluate projects.	Revised in the final report.

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206	World Bank Task Team consolidated comments	World Bank	Paragraph 221 and Chapter X: Paragraph 3	From text: 'As a result, particularly in Foshan, the environmental bureaus of the different districts now meet more regularly to discuss issues. They have established a system where, whenever disagreements arise, the municipal government facilitates consensus and puts down agreements in writing to avoid future conflict. Much attention has also been given to building the capacities of the respective business entities that will manage the shared infrastructure.'	Please refer to P. 16 of ICR - "To introduce a regional planning approach, the project was to implement two to three pilots to foster inter-municipal cooperation in the planning and construction of shared wastewater facilities. Two pilots were completed: (a) the construction of the Nangang WWTP, shared between Guangzhou municipality and the EDZ, and (b) a sewerage network, shared between Chancheng and Nanhai districts in Foshan. Both interventions showed savings in capital expenditures and land acquisition compared with the alternative of having each district build its own system. However, the sharing of responsibilities and operational costs in the operational phase still needs to be clarified as these issues were not adequately defined in the regulatory framework created under this component. The third pilot appraised, the Luoxi Island WWT System, was dropped in late 2011 for reasons explained above."	Included in the final report.
207	World Bank Task Team consolidated comments	World Bank	Paragraph 304	From text: "Although no data was made available, GEF provided support for monitoring equipment and software in Foshan and Guangzhou (GEF ID 2135) and in Qui Nhon (GEF ID 2758), which are still in the 104 process of completing pollution control infrastructure."	The beneficiary is Guangdong Provincial EPB, so the investment is to support the entire province focusing on PRD. Please refer to P.17 of ICR "Another step in moving toward regional planning was to promote crucial improvements in water quality monitoring and information dissemination to foster regional planning and data sharing. GDEPB now has a modern GIS-based platform with real time monitoring of water quality in 57 stations across the PRD. <i>This information is already being used to inform the environmental enforcement department of the GDEPB of any possible anomaly or violation of discharge regulations. Data on the water quality class of the different sections of the river is published online and updated on a weekly basis.</i> Yet, the detailed, parameter-wise water quality information is kept internally in the GDEPB. GDEPB has shared data on air quality with other municipalities (Hong Kong, Macao), but this is not the case for water quality data as intended under the project. Explanations given by the Borrower Borrower's Completion Report states "Given the organization of such a meeting being a long and complex process, and its low relevance to the project, in order to avoid delays, it was agreed to drop the South China Sea conference from the subcomponent and reallocate the financing to other tasks" about the justification for eliminating the activity of a regional conference on water quality show the low priority given to this approach."	Included in the final report.
208	World Bank Task Team consolidated comments	World Bank	Paragraph 26	From text: "the statement that local residents complained potential flood risks from the treatment facilities"	Please consider to update the statement with the latest developments: "Ten (10) households adjacent to the wastewater treatment plant being constructed in Qui Nhon (Vietnam, GEF ID 2758) had claimed that the on-going construction of the project components (including the CC GEF) has created a potential flooding risk to their residences. After the complaint was reported to the Bank, the Bank and the client agreed to a detailed action plan. It was recently reported that related compensation has been made to those households in a satisfactory manner."	Included in the final report.
209	World Bank Task Team consolidated comments	World Bank	General Comment	Reference to Hay Tay (Vietnam)	Please note that Hay Tay was merged into Hanoi in June 2008. So the report may want to clarify this change and use 'Hanoi (Vietnam)' instead.	Ha Tay substituted with Hanoi in final report.
210	World Bank Task Team consolidated comments	World Bank	Paragraph 51	From text: "... Although not approved within the framework of the fund, were developed following similar principles."	Please reconsider this statement as the regional project was developed without any considerations with linking with the Bank's ongoing or future lending operations, while it was the intention of the Investment Fund to link GEF and Bank financing together.	The sentence has been modified to read "...following similar principles related to the demonstration of pollution treatment technologies".
211	World Bank Task Team consolidated comments	World Bank	Paragraph 123	From text: "Two of the 21 projects are regional and were financed fully through GEF grants. and the 'Livestock ... Project' for USD 24 million"	Please clarify that these two projects did not have Bank financing but did have cofinancing from other sources as well. For the Livestock Project, GEF financing is only USD 7 million, less than 1/3 of total project financing.	Deleted in final report.
212	World Bank Task Team consolidated comments	World Bank	Paragraph 154	The statement on its regional dimension and MOU	Please reconsider the statement on LWMP as part of the Investment Fund. LWMP's regional component had nothing to do with PEMSEA but through FAO. So inclusion of the project in this paragraph will mislead the readers to think that this project's regional activities were also done the MOU between the Bank and PEMSEA.	Footnote added to clarify this statement.
213	World Bank Task Team consolidated comments	World Bank	Paragraph 221	From text : "For the Livestock ... Project ..., the focus has been more on building individual capacity than on building those of the institutions."	Please note that the project has components on 'policy and replication strategy development' and 'regional support services' which were focusing clearly on capacity development for institutions.	Deleted in final report.
214	World Bank Task Team consolidated comments	World Bank	Paragraph 306	On statement on results monitoring	Please see the Bank's general comment on long-term monitoring arrangements. For this project, project supported monitoring was designed to be comprehensive to verify the effectiveness of the new treatment system and thus might be viewed costly by participating farms. Also please validate the statement that "inappropriate for the parameters being tracked." Note that all project supported monitoring activities were discussed and agreed with project country's environmental, agricultural and health authorities. Views from interviewees who are not monitoring professionals should be quoted with caution.	Noted and acknowledged in the final report.