GEF Secretariat Comments on the "IEO Evaluation of Institutional Policies and Engagement at the GEF"
submitted 17th May 2021- returned with GEF-IEO notations for the uploaded version of the report (May 24th, 2021)

Comments on:

Safeguards

PARAGRAPH NUMBER	REFERENCE TEXT	COMMENTS	GEF-IEO RESPONSE
2	*Key Findings: (bullet point 2) "However, unlike the Policy on Gender Equality and the Policy on Stakeholder Engagement, the Safeguards Policy does not require safeguards reporting in PIRs, a curious mis-alignment and missed opportunity to codify and standardize established practice as Agencies, to a large extent, have already been including some safeguards information in PIRs."*	The Policy on Environmental and Social Safeguards (ESS Policy) states that "*Agencies provide information on the implementation of relevant environmental and social management measures at project mid-term, if applicable, and at project completion. (GEF Policy on ESS (2018), para 14, SD/PL/03)*" While it is not a requirement of the ESS Policy, some CEO Endorsements with high/substantial ESS risk mentioned that they will update implementation of their Environmental and Social Management Plans in PIRs. Further ESS related reporting would be able to be determined at the CEO Endorsement stage.	As this evaluation examines , in part, the consistency across the three policies, this is a relevant finding, noting that the policy did not include reporting at PIR unlike the other policies. It is noted that Agencies are providing some safeguard implementation information in PIRs. However, GEF could help systematize this reporting. This is especially important for higher risk projects, and projects that are utilizing a framework approach for which ESIAs, ESMPs, etc. will be developed only during implementation.
2, 15	*Key Findings: (bullet point 2)*	Presumably this was a negotiated outcome with the Agencies? Did IEO receive any feedback from the Agencies on the utility (vs. burden, etc.) of such annual reporting and why it was not agreed?	As noted above, many Agencies are already including some safeguard implementation information in PIRs; it does not appear to be an additional burden.

PARAGRAPH NUMBER	REFERENCE TEXT	COMMENTS	GEF-IEO RESPONSE
2	*Key Findings: (bullet point 3)* "GEF has not moved forward on the IEO recommendation to support capacity development, expert convening and communications on safeguards in the GEF Partnership."	The GEF has incorporated issues related to ESS in ECWs, Agencies retreats etc. and has also developed guidelines on the implementation of the Policy on ESS, in consultations with Agencies. It is also important to note, that compared to the GEF Policy on Gender and Stakeholder Engagement, the GEF Policy on ESS **did not** incorporate a specific requirement for the GEF to play this role as part of the ESS implementation (and this policy was approved by council without this explicit requirement). In addition, it might be beneficial to at least mention here that many Agencies are still in a process updating their ESS policies and that the GEF Secretariat has facilitated consultations with Agencies as part of the Agency compliance assessment process. Capacity development is a broad issue and this statement might warrant a little more detail/precision, including issues related to the GEF's role as supporting learning and knowledge sharing in this area.	Points added regarding the lack of a knowledge sharing requirement in the policy, and that information sessions have been held during ECWs, etc. The section regarding Recommendation 3 provides more specificity re capacity building vs knowledge brokering.
2	*Key Findings: (bullet point 3),* Also paras 22-24	It would be useful to clarify and differentiate recommendations that were meant for the Secretariat and those directed at Agencies. For instance, it is likely that Agencies have implemented and communicated capacity development activities to Executing Entities and recipients consistent with their mandates, whereas the convening and knowledge sharing role within the Partnership would be predominantly for the Secretariat.	This is a welcome differentiation and added to the section on Recommendation 3.

PARAGRAPH NUMBER	REFERENCE TEXT	COMMENTS	GEF-IEO RESPONSE
2	*Key Findings (bullet 4): "further reviews…highlight potential areas where the GEF safeguards could eventually be further strengthened (noting however, that some Agency interviewees indicated no desire for a change in policies anytime soon)."*	The Agency comment in parenthesis is an important one and points to the tradeoffs of such 'further strengthening'. What such tradeoffs were reported/suggested by Agencies?	The point made was that it is too early to change policies given current roll-out of updated policies. Specific issues regarding time or cost were not mentioned.

PARAGRAPH NUMBER	REFERENCE TEXT	COMMENTS	GEF-IEO RESPONSE
9	Para 32. "Nevertheless, GEF may wish to consider whether the updated policy covers the full range of relevant safeguard principles and requirements that could contribute not just to environmental and social risk avoidance and mitigation in GEF-Financed Activities but also to improved outcomes, reinforcing potential key strategic priorities of sustainable recovery and inclusion over the coming years. The following sections address some issue areas that GEF may wish to consider when it reviews the updated Policy on Environmental and Social Safeguards. "	The language to propose some additional areas/issues that the GEF "may wish to consider when it reviews" seems a bit loose and rather should clarify if there are any specific and important gaps. It could be written more clearly - when the Council decides to update the ESS these additional areas could/should be considered.	Thank you. The language has been tightened up.

18	*"At this early stage of implementation of the new policy, there is no indication that the GEF Secretariat assigns risk flags to high risk projects for heightened monitoring and reporting."*	As the Progress Report on the Implementation of the GEF Policy on Environmental and Social Safeguards (GEF/C.59/Inf.15) indicates, only 16 percent of PIFs/PFDs in the December 2019 Work Program classified ESS risk, and PIFs/PFDs in the June 2020 Work Program are the first ones to follow ESS risk classifications under the ESS Policy (SD/PL/03) and the Guideline on GEF's Policy on Environmental and Social Safeguards (SD/GN/03). The ESS risk classification at the PIFs/PFDs stage is preliminary since many projects do not define specific project sites and other detail of the projects. Many ESS screening documents indicate that they will need to revisit the overall ESS risk during the Project Preparation Grant (PPG) stage. Many of the PIFs/PFDs also said that they will have a plan to conduct a more detailed environment and social assessment and to develop environmental and social management plans prior to CEO Endorsement and/or during the project implementation. Thus, it is too early to analyze high risk project monitoring and reporting practices at the PIFs/PFDs stage. At the CEO Endorsement stage, the GEF Secretariat started seeing some high/substantial risk projects committed to reporting on update and progress of the Environmental and Social Management Plans. The GEF Secretariat will keep monitoring the projects not only at PIFs/PFDs stage, but also at CEO Endorsement stage, which have more detailed information of project risks and their management plans.	Added statement re Secretariat commitment to monitor E&S risks in projects, but noted that mechanism for doing so has not been elaborated.

PARAGRAPH NUMBER	REFERENCE TEXT	COMMENTS	GEF-IEO RESPONSE
32	*"Nevertheless, GEF may wish to consider whether the updated policy covers the full range of relevant safeguard principles and requirements that could contribute not just to environmental and social risk avoidance and mitigation in GEF-Financed Activities but also to improved outcomes, reinforcing potential key strategic priorities of sustainable recovery and inclusion over the coming years."*	Considering that 10 Agencies out of 18 have complied with the GEF Policy on ESS (2018) (SD/PL/03) as of October 2020, eight Agencies are still in the process of improving their ESS policies. It is therefore not the best timing to strengthen a wide range of other provisions as the evaluation recommends.	This point has been added.

| 37 | *"The updated 2018 Policy added a number of provisions directly related to human rights without however mentioning the term ("human rights" does not appear in the policy). "* | The Policy on ESS focuses on disadvantaged and vulnerable groups, nondiscrimination, inclusion of persons with disabilities, gender discrimination and gender-based-violence, non-retaliation against complainants, expanded FPIC provisions regarding indigenous peoples, strengthened participation, which are more explicit about consideration of human rights in terms of GEF projects. These are considered as fully addressing the recommendation from 2017 GEF IEO review. In addition, considering that eight Agencies are still in the process of improving their ESS policies, it is not the best timing to revise the current Policy on ESS.

Para 4 of "REVIEW OF THE GEF POLICY ON AGENCY MINIMUM STANDARDS ON ENVIRONMENTAL AND SOCIAL SAFEGUARDS (IEO 2017)" states the following:

4. Key findings of the review include the following: (d) [...] A high-level comparison of the GEF Safeguards with more recently adopted policy frameworks identified a range of gaps and/or areas of greater emphasis, including human rights, nondiscrimination equity; stakeholder engagement; climate change and disaster risk; biodiversity offsets; invasive alien species; supply chains; sustainable resource management; community health, safety and security; hazardous materials; involuntary resettlement; indigenous peoples and the application of free, prior informed consent (FPIC); cultural heritage; and labor and working conditions. | While the 2017 review did not further elaborate on how human rights should be incorporated into an updated framework, it is apparent that many agency safeguard frameworks are increasingly explicit in aligning with international human rights. |

PARAGRAPH NUMBER	REFERENCE TEXT	COMMENTS	GEF-IEO RESPONSE
36-41	*Human Rights*	The IEO recognizes almost a dozen distinct human rights provisions included in the policy. It would be helpful to understand the additional benefit of adding a 'human rights' label to these provisions, and what specific additional provisions would be recommended.	At this stage, the lack of explicit acknowledgement of the international human rights framework gives the appearance that the GEF is taking a piecemeal approach to respecting human rights, which are universal, indivisible and interdependent.
45	*"the GEF could consider the more detailed provisions incorporated by Agencies"*	As GEF policies are meant to align with Agency policies (and the latter take precedent over the former in case of conflict) is there a risk that additional detail would create implementation challenges for some Agencies? (see also comment to para 49)	This is a quote from the IEO evaluation on fragility and conflict. There appears to be mutual learning between Agencies and the GEF regarding the content, specificity, and procedural focus on safeguard requirements. The GEF has done an admirable job in striking a balance between establishing key safeguard principles and not overwhelming Agencies with unachievable objectives. However, safeguards are of course an evolving area and, as the evaluation on fragility and conflict pointed out, new learning and lessons will need to be incorporated over time.
47	***"Other issues for consideration.** GEF may also wish to consider a range of other specific issues when it considers updating the Policy on Environmental and Social Safeguards. "*	As mentioned above, considering that 10 Agencies out of 18 have complied with the GEF Policy on ESS (2018) (SD/PL/03) as of October 2020, 8 Agencies are still improving their ESS policies. It is therefore not the best timing to strengthen a wide range of other provisions as the evaluation recommends.	Language revised to indicate "when" the Policy is reviewed.

PARAGRAPH NUMBER	REFERENCE TEXT	COMMENTS	GEF-IEO RESPONSE
47	MS4: "..Persons who are economically displaced and are without legally recognizable claims to land should be compensated (not just provided assistance) for any lost assets.."	It would be helpful to understand how Agencies would provide such compensation – using their own budget resources, funds from the GEF trust fund (possibly requiring Council approval), or other?	It is a common standard among land acquisition and resettlement safeguards that the most disadvantaged group of affected persons (those without land rights) need to be compensated for any assets and improvements they have made to the land from which they are being displaced (but not the value of the land itself). Compensation would come from the same sources that compensate other categories of displaced persons (those with recognized land rights, etc.). These sources could be project funding, national authorities, or GEF resources if so chosen). This would not be a qualitatively different requirement than the existing one to compensate those recognized land claims.
49	"Some Agencies see no need to reference the updated GEF policy since their own safeguards frameworks are aligned." AFTER VERIFYING THAT OWN ARE ALIGNED	This point could be explored further as it appears to have far-reaching implications for GEF policies more generally.	Text revised to indicate 'after verifying alignment.' This helpful harmonization effect has been acknowledged in this and earlier evaluations.

PARAGRAPH NUMBER	REFERENCE TEXT	COMMENTS	GEF-IEO RESPONSE
50	*"Many Agencies welcomed the updated policy's focus on higher-level safeguard requirements and noted that it is not overly prescriptive, providing needed flexibility as Agencies elaborate their own frameworks."*	An important point – probably should be recognized in para 45 (see comment above)	As noted at para. 45 above, this is a quote from a separate IEO evaluation on fragility and conflict. Again, the GEF has done an admirable job in striking a balance between establishing key safeguard principles and not overwhelming Agencies with unachievable objectives. However, additional issues and more specificity may still need to be considered.
60	*Policy Compliance* *"The portfolio review could not discern relevant trends for this variable across focal areas, Agencies and regions."*	Since only 16% of the PIFs/PFDs approved in the December 2019 Work Program (before the Guideline on GEF Policy on Environmental and Social Safeguards) classified ESS risks for the projects and programs, initial risk classifications of ESS risks in the *Progress Report on the Implementation of the GEF Policy on ESS* in November 2020 are only from the June 2020 Work Program. We found that some projects changed the risk classifications during preparation of the CEO Endorsements. Thus, it is too early to discuss trends of ESS risk classifications of the GEF portfolio at this stage.	The evaluation clearly states that data is limited to draw any conclusions on compliance trends.

Stakeholder Engagement

PARAGRAPH NUMBER	REFERENCE TEXT	COMMENTS	GEF-IEO RESPONSE
General Comment	Could this evaluation and the one on CSO Network have been consolidated/merged?	We have positioned the GEF-CSO Network and the Engagement with Indigenous Peoples follow up reports in sequence following the discussion of the Updated Stakeholder Engagement Policy. Beneath the Recommendations is a small section that introduces the structure of the report. It notes that the evaluation was designed to have a particular focus on GEF developments that have culminated in the Updated Stakeholder Engagement Policy. Of the three policies, this one has had the least evaluative attention over the past four years. Coverage of the other two policies are by way of follow ups to evaluations/reviews undertaken over the past four years. Two other evaluations focused on IP and CSO stakeholder groups are also addressed through follow ups.

PARAGRAPH NUMBER	REFERENCE TEXT	COMMENTS	GEF-IEO RESPONSE
2	*Policy requirements cover the full project cycle but are front-loaded to CEO Endorsement. As a result, at the portfolio level, documentation tends to be compliance/risk focused and anticipatory of results. Pathways/indicators are not defined, program/project templates are "open ended" in their requests for information, and understanding is anecdotal on how the policies contribute to impact across the focal areas.*	This is an important topic. The updated GEF Monitoring Policy clarified and enhanced the authority of the Secretariat to review project implementation reports submitted by Agencies and collaborate with them to ensure compliance with relevant policies. The GEF Portal has further enabled this effort with new and updated Agency entry requirements during implementation, including fields focused specifically on implementation of the Policy on Stakeholder Engagement and other key GEF policies. On these lines, the Secretariat has been building a stronger system for portfolio-level review, in line with Policy, and has updated its Annual Monitoring Report to Council to put a strategic focus on priorities and requirements for delivery. The draft report is helpful in raising this important topic, and its inputs may be considered in this broader context.	This is acknowledged in the text under Policy Coherence, paragraph 127. The ongoing development of Secretariat's reporting function is acknowledged in the text supporting Recommendation #1.

PARAGRAPH NUMBER	REFERENCE TEXT	COMMENTS	GEF-IEO RESPONSE
10	*GEF's Stakeholder Engagement Policy is less specific than several comparators regarding inclusion of disadvantaged and marginalized groups and individuals.*	One important factor here is that the Stakeholder Engagement Policy is intended to be read together with other inter-related GEF Policies, including the Policies on Environmental and Social Safeguards and Gender Equality. The former has specific provisions regarding inclusion of disadvantaged and marginalized groups and individuals, including individuals with disabilities. In addition, the Guidelines for Implementation of the Stakeholder Engagement Policies: • State that "meaningful consultation is a two-way process that, *inter alia* "[i]s free of external manipulation, interference, coercion, discrimination, and intimidation" • Highlight that stakeholder engagement should be undertaken in an inclusive and gender responsive manner • Set out clear requirements of FPIC and culturally appropriate consultations and dialogue to enable Indigenous Peoples to receive fair and equitable opportunities from a project.	This reinforces the findings of the evaluation that the policies require tighter integration and cross-linking to be able to fully address the requirements. The greater specificity of comparator Agencies' policies regarding inclusion of disadvantaged and marginalized groups in engagement processes is instructive.

PARAGRAPH NUMBER	REFERENCE TEXT	COMMENTS	GEF-IEO RESPONSE
Page 24, Para 88	*The 2018 policy on Stakeholder Engagement supersedes GEF's 2012 Policy on Public involvement. The latter widens the scope of the former with a policy focus on promoting the "inclusive and meaningful participation of stakeholders in GEF's governance and operations."*	Is there a mix up of terms? Or do a rewrite. The latter also used later incorrectly – in the same paragraph.	Corrected
6, 9, 10, throughout	*WB, IDB, and UNDP as comparators. "The GEF Policy, however, is less specific than those of comparators"*	GEF already benefits from the SE policies of these entities as they are GEF Agencies. Should also recognize that if GEF policy were more specific, it could conflict with GEF Agency policy (which takes precedent in case of conflict).	Para. added: It is acknowledged that in formulating its policies the GEF seeks to strike a balance between establishing clear requirements without being overly prescriptive and detailed which could make implementation more difficult and could raise more points of conflict with Agency policy frameworks. Nevertheless, the findings of gap areas and 'lack of specificity' in the GEF Stakeholder Engagement Policy when compared to similar policies of other institutions are germane, indicating potential areas of strengthening when the policy will be reviewed.
29, 33, etc.	*"Accredited Agencies"*	GEF does not use an 'accreditation' process.	Corrected

PARAGRAPH NUMBER	REFERENCE TEXT	COMMENTS	GEF-IEO RESPONSE
46	*Not getting feedback on reports, once entered in the portal, leaves Agencies unsure about whether or how reports are used, or whether they meet expectations. This has created a perception that the GEF is underusing the information provided.*	This seems like a significant finding, but is not supported or elaborated further.	Some elaboration given in para. 187.

CSO Network

PARAGRAPH NUMBER	REFERENCE TEXT	COMMENTS	GEF-IEO RESPONSE
10	*Typically, the Network organized meetings of regional CSOs on the day prior to the Expanded Constituency Workshops (ECWs) to promote the CSO Network, exchange project-based knowledge and to prepare CSO positions for presentation to the regional constituency during the Workshop. These meetings were supported logistically and financially by the GEFSEC.*	Should add that as from GEF-7 the ECWs incorporated a full day dedicated to CSO issues where all participants are present. This allows for greater exchanges between CSO, government officials and other participants.	Clarified that this paragraph was referring to the state of play at the time of the CSO Network Evaluation (2016), but have added this in to the narrative under Section 7.3.6.
14, last bullet	*Within the context of an increasingly complex operating environment, the GEF has strengthened organizationally over the period under evaluation but governance challenges remain*	This comment is unclear and needs precision/elaboration. Is this comment meant to refer the GEF as a whole or to the GEF CSO Network?	Corrected

PARAGRAPH NUMBER	REFERENCE TEXT	COMMENTS	GEF-IEO RESPONSE
70	*The Network is presently caught in a <mark>viscous cycle</mark>; it hasn't demonstrated its value proposition in a way that attracts donor resources, and without those resources it is hard pressed to generate value for its members and GEF Partners.*	Maybe the wording is meant to be **vicious cycle**?	Corrected
22	*Reduced scope for CSOs to engage Council on upcoming/emergent agenda items as a result of having Consultation sessions topics anticipated 12 months in advance and planned conjointly with the GEF Secretariat, and a perceived re-framing of the Consultations as information exchange rather than policy dialogue events*	This implies that the Network is not involved I the planning and selection of these topics while in fact all meetings and details are planned with the Network colleagues where they have room to frame the Consultations. A challenge may be that there is not wide involvement of the network members other than the Coordination Committee and often mainly the Chair and CO chair.	Paragraph redrafted to clarify that the perception of the CSO Network is that they don't have the same opportunity to set the agenda themselves as was the case prior to the Updated Vision.

PARAGRAPH NUMBER	REFERENCE TEXT	COMMENTS	GEF-IEO RESPONSE
23	*One pertains to the relaxation of the rules regarding when CSO representatives can speak at Council. The CSO Network welcomes this measure but regards it as diminished in significance because of the newfound constraints in convening RFPs to prepare Network inputs on agenda items* *Again, this is welcomed but it comes with the concern that the GEF is putting all its capacity building efforts into its own Country Support Program (which includes the ECWs and National Dialogues) rather than seeing the CSO Network as a potential capacity building asset in this regard.*	Not clear what this means – since the GEF still supports the participation of the Coordination Committee for preparation of their Council Position – the weekend prior to the Council Meeting. In relation to the CSP activities – in GEF 7 two CSOs per country have participated in all ECWs – and all National Dialogues convenors are urged to include CSOs. Not sure what the last statement means – 'seeing the CSO network as a potential capacity building asset…..'	Clarified the perception as follows: a) the Coordinating Committee is unable to meet in Washington (as a whole) as it customarily did to prepare for Council. Clarified the perception as follows: that as a result of its membership being distributed globally, there is potential in the Network to play a capacity development role itself.
53	*Historically, internet connectivity has posed as a communications challenge to networking within civil society. Quality meeting and training interactions have only been possible in person* *.*	May be worthwhile mentioning language as a huge challenge in addition to connectivity. In particular the involvement of Francophone CSOs due to language barriers – despite their willingness and request to be more involved. This effectively affects at least half the countries in Africa.	Inserted this in the Table 7.1, as it was mentioned by CSO Network member respondents.

PARAGRAPH NUMBER	REFERENCE TEXT	COMMENTS	GEF-IEO RESPONSE
53	*Box 4 – Global Data Internet Usage*	During this time, it has also facilitated greater GEFSEC engagement on Intro Seminars, etc. Any data, findings available on that?	In the Gender Equality Policy section, we do include mention of the uptake data for the on line course (Box 10.3). More broadly, a question was posed to the Secretariat (communications team), regarding user traffic related to specific web pages and other on line offerings. We did not secure this information however.
40	*regarding ability to access GEF Council decision-making were "less than expected".*	It would be helpful to unpack this, as Council deliberations and decisions are made public.	This data came from a closed ended question in the CSO survey. There is some commentary in the more general qualitative remarks indicating that some CSOs have felt overlooked in the selection process to be part of Council. It is implicit the comments under Governance in Table 7.1
59, 60	*The list includes five entities that are themselves accredited GEF Agencies.*	GEF does not use an "accreditation" process per se. Suggest to just use term "GEF Agency"	Corrected
63, etc.	*(financial support to CSO networks)*	Is any informaiton available on how other funds provided this (e.g. who entered into the grant agreements/contracts, who supervised and assumed accountability for use of funds, role of trustee, etc)?	Paragraph inserted.

Gender

PARAGRAPH NUMBER	REFERENCE TEXT	COMMENTS	GEF-IEO RESPONSE
General comment		It could be a good idea to note and describe that this evaluation on gender has been less in-depth than the one on stakeholder engagements etc., and to further describe the methodology.	This is now stated at the beginning of the report.
Page 2 para 9	*It is in this policy that a there is a marked shift from a risk mitigation*	Please check language	Rephrased to "The recent Gender Policy makes a shift from a 'do no harm' approach to a more hands-on gender responsive approach.

PARAGRAPH NUMBER	REFERENCE TEXT	COMMENTS	GEF-IEO RESPONSE
Page 6 (bullet i:j)	*1. Gaps in alignment with best practices are observed by Agency key informants in the following areas: on the definition of the gender focal point role, on the assignment of budget resources at the corporate level to support the Policy, and on the tracking of financial data as a way to assess commitment to the Policy.* *j. Observed constraints in implementation include: uneven patterns of gender data collection across the Agencies thereby hampering analysis, internal agency-level challenges bringing staff on side with gender equality concepts, and country level factors warding against recognition of gender equality as factors bearing on the global environment.*	Please make it more clear that these challenges/limitations refer to Agencies' reporting on their internal challenges as per their own system, Procedures and capacity,	Rephrased to Observed constraints in implementation for Agencies include….

PARAGRAPH NUMBER	REFERENCE TEXT	COMMENTS	GEF-IEO RESPONSE
Page 10 (Para 30)	*In the main, the Gender Policy aligns well other comparator organizations on international best practices. It shows gaps along two dimensions. The first is on the clarity of roles assigned to gender focal points, and on the deployment of location-based gender units to support policy implementation. The second is on the extent to which the tracking of financial data reflects the GEF's gender equality policy commitments and helps support institutional accountability for targets set and met.*	Again, please make it clearer that the gap referred to specifically apply to Agencies and does not in fact reflect a gap related to the GEF Secretariat. It is also not fully clear how these gaps relate to the GEF Gender Policy.	Rephrased to - "The GEF Gender Policy aligns well with other comparator organizations on international best practices. However, gaps are seen along two dimensions. The first relates to clarity of roles for gender focal points, and deployment of Agencies' location-based gender units to support policy implementation. The second is on the extent to which financial data tracking reflects GEF's gender equality policy commitments, and helps support institutional accountability for targets set and achieved. Filling these two gaps would allow for establishing a more uniform system of gender focal points to implement the GEF Gender Policy, along with clear roles, budget, and tasks on gender programming. Since GEF does not have country offices, this would have to be done through Agency staff - potentially Agency HQ staff, and then applied to Agency country offices.
Page 11	*GEF does not include location-based gender focal points.*	This seems to be compared to UNIDO's "well-defined role for Gender Focal Points linked to a network that is location based (at Headquarters and in the Regional, Country and Liaison Offices)." It is not clear if this is intended to apply to the GEF Secretariat (comparisons with CIFs are with the CIFAU) or with the GEF Agencies, who have such local presence.	See above response on Gender focal points

PARAGRAPH NUMBER	REFERENCE TEXT	COMMENTS	GEF-IEO RESPONSE
Page 17 (para 52) Highlights from the portfolio review include:	*About half of projects share a gender analysis and action plan prior to CEO Endorsement*	Please clarify how the IEO define what constituted a gender analysis in this review. As per the GEF Guidance *"The scope of the analysis can vary and it can be carried out in various ways, depending on GEF Agency policies and procedures, as well as the specific project/program context. The effort should include a collection and analysis of quantitative and qualitative sex-disaggregated data and gender information. The gender analysis can be a stand-alone activity or it can be included as a key component of broader stakeholder analyses or social and situation assessments"* Also, please clarify which projects are included in your review as this matters… for example an EA or a purely technical assistance project/ activity very seldom include standalone gender analysis but are deemed to be gender informed. Similarly, a standalone gender action is not required - it can also be included as part of the project results framework or specific activities describes in the Prodoc or section on gender in the portal. Probably, best to just clarify and say that - About half of projects share **a standalone** gender analysis and action plan prior to CEO Endorsement	Added a footnote to describe the method used by the project team to describe the method used by the project team to discern what counted as gender analysis.

PARAGRAPH NUMBER	REFERENCE TEXT	COMMENTS	GEF-IEO RESPONSE
Page 18 Para 55	*Over the Identification and Design stages of the project cycle, review findings show evidence of gender 'inclusion' in the formulation of project activities and results (~90% of projects).* <mark>There is no appreciable change with the introduction of the updated policy</mark>.	I am not sure how to understand this paragraph – as I thought the review related to the updated policy. Not clear what gender 'inclusion; in this case means and how there is not much change between the before and after. Perhaps it could be rephrased and made clear what it refers to.	Clarified with frequency data.
Page 18 Para 55	*There is, however, a "before - after" differential across the two groups of projects on the following variables:* • *mention* <mark>of stakeholder consultations including</mark> *individuals or groups with a gender perspective - from 18% to 30%24*	Mention of stakeholder consultations: - not sure what this refers to in the context of the gender policy or the stakeholder engagement policy.	Clarified in an explanatory footnote.
Page 18 Para55	• *inclusion of a gender analysis in the project documentation – from 33% to 57%; and* • *inclusion of a Gender Action Plan - from 25% to 55%*	References to gender analysis should be clarified – if they refer to stand alone gender analysis. And the same for the Gender Action Plans as they also may or may not be included (as mentioned above)	Clarified in explanatory footnotes.

Indigenous Peoples

PARAGRAPH NUMBER	REFERENCE TEXT	COMMENTS	GEF-IEO RESPONSE
General		It would be good to highlight the level of consultation undertaken with the IPAG members.	This is mentioned in the Methods Section.
General		The review should ensure consistent writing and use of the term indigenous peoples or indigenous peoples and local communities. We know that the safeguards use specific language on only indigenous peoples to avoid confusion; however, they also allow agencies to make their own determinations on indigeneity that may not agree with national policy. IPLCs is the terminology agreed upon and used by the CBD and is typically what the GEF chooses to use which, among other things, allows us to avoid some of the issues related to government classifications.	Explanatory text included under Background and Context

PARAGRAPH NUMBER	REFERENCE TEXT	COMMENTS	GEF-IEO RESPONSE
12	*IPAG consisted of seven members: four indigenous representatives, one selected by the GEF CSO Network to ensure coordination, with the remaining three nominated through meetings and selected by GEF for geographic balance and experience, with nominations reviewed and endorsed by Indigenous leaders and Indigenous Peoples networks; an expert on Indigenous Peoples, and two GEF representatives.*	The membership of IPAG is incorrectly described. 1. GEF staff and consultants are not members of IPAG 2. There is an agency representative. Someone who works for a GEF agency on indigenous peoples issues. In practice, it has been someone from an agency leading indigenous peoples with the SGP indigenous peoples lead as an alternate/observer. Following the initial representatives, IPAG members have provided input on the selection of this person and have welcomed SGP staff participation. 3. Regional IP members – Submit an application for selection by the GEF with input from the current IPAG members. The member must have a nomination from a regional IP organization (as there are different ways the subregions are organized – this can vary). 4. CSO IP Representative – This is one of the 3 CSO IP members of the CSO Network Steering Committee. They are selected based on conversations among the three representatives.	Clarified in the text that the membership configuration described was specific to the time of the evaluation in 2017.

PARAGRAPH NUMBER	*REFERENCE TEXT*	COMMENTS	GEF-IEO RESPONSE
14	*"throws a significant challenge"*	I think I agree with the sentiment, but the word choice is unclear here.	Adjusted.

			Both paragraphs rephrased.
15 and 20	*Para 15, Key Findings b: The ICI is part of a welcome trend in a wheel of change that moves slowly. Here, the STAR allocation practice is seen as a factor. Other parts of indigenous peoples programming remains static (the IP fellowship and SGP are highlighted).* *Para 20: Other parts of indigenous peoples programming are perceived to be static or modest, overall. Here, the SGP (including the IP Fellowship Program and the support for the Global Support Initiative for*	It does not seem to be fair to describe the SGP IP Fellowship as static. This is a relatively new program that is continuing to innovate with the selection of national fellows. Statements such as this can influence whether there will be continued support for it. We will also note that this program comes out of SGP "corporate" budget and, therefore, pushes to cut the corporate budget also impact well-regarded programs such as this one.	

PARAGRAPH NUMBER	REFERENCE TEXT	COMMENTS	GEF-IEO RESPONSE
	Indigenous Peoples and Community-Conserved Territories and Areas (ICCAs)) is highlighted.		

| 17 | *The Inclusive Conservation Initiative (ICI) is roundly welcomed as a breakthrough funding initiative designed for local impact, GEF-wide learning and scale out/up. The initiative is seen as precedent setting – that is, complementary to but larger in project scale than SGP, dedicated to creating indigenous people-designed and implemented projects in biodiversity hotspots. IPAG members see in it, a "chance to test and showcase how it can work to have indigenous peoples at the centre of projects".* | It is worth noting that ICI 2 (or whatever it is called) is currently included in the GEF-8 programming directions document as part of the Biodiversity Set Aside resources as it was funded in GEF-7. As we know, any set aside funds take resources "from" STAR allocations.

The document is generally quite positive about ICI and it will be important to deliver a clear and strong message in this area to ensure the funding of ICI 2. Perhaps, if the evidence merits, an explicit call for continued/additional funding in GEF-8. | The evaluation is only able to comment on the development of ICI over its formative stages. |

PARAGRAPH NUMBER	REFERENCE TEXT	COMMENTS	GEF-IEO RESPONSE
20	*Data gathered from the Annual Monitoring Report and SGP Scorecard shows what is described in the 2021 Evaluation of the SGP as a "gradual" uptick since 2016-17 (~70 percent) in the number of SGP projects completed annually with indigenous peoples, such that* today projects with a focus on indigenous peoples make up about 20% of the total SGP portfolio*.*	It is surprising to see the figures seem to be quite different than the recent SGP publication on work with IPLCs - https://sgp.undp.org//innovation-library/item/download/2245_a0b74f5d1cf5e904a4ee8988930020a8.html They also were able to narrow the question of percentage of projects with IPs by including the filter of the number of countries where they operate where there are IPs present. The question of what percentage of projects *should* include IPs is a challenging one because there are many countries that do not have IPs – their assessments have worked to addresss these issues.	The data from the SGP publication has been referenced in a footnote.

PARAGRAPH NUMBER	REFERENCE TEXT	COMMENTS	GEF-IEO RESPONSE
Box 1	*Expanding and Diversifying the National System of Terrestrial Protected Areas" (NewCAPP) was launched in 2009 as a Full-size Project implemented by the UNDP through the Department of Environment and Natural Resources - Protected Areas and Wildlife Bureau (DENR-PAWB).*	This project was an MSP.	Corrected.

PARAGRAPH NUMBER	REFERENCE TEXT	COMMENTS	GEF-IEO RESPONSE
25	*The presence (or absence) of a grievance mechanism and the quality of the processes it follows are also identified as indicators of agency readiness to engage indigenous peoples.*	Were there some Agencied identified without grievance mechanisms? Would be surprising as this is a GEF MFS and ESS requirement.	Adjusted to refer to their development more than whether they exist, or not. Our understanding is that all Agencies have mechanisms, but in differing stages of development.

| 29 | *Improving dialogue between indigenous peoples and local communities and GEF government focal points remains a work in progress. There are project level successes, but country contexts can quickly change.* Understanding that each country context is unique and often dynamic, indigenous leaders suggest the following for GEF for their potential to build shared understanding: showcase success - notably ICCAs (showing advantages of inclusive approaches); ensure that | It would be helpful to get guidance on how to do this or where it has been done effectively, particularly given GEF's limitations. | Box highlights how this was done with ICCAs. |

PARAGRAPH NUMBER	REFERENCE TEXT	COMMENTS	GEF-IEO RESPONSE
	Agencies are using the influence that they may have built with host governments, and that they can wield with ESS and Stakeholder Engagement policy commitments; make high profile public statements in support of UNDRIP/FPIC; continue/increase attention to youth leadership development and SGP (to build country capacity).		
37	*Annual funding for the IPAG has remained stable since the 2018 evaluation*	In light of funding for meetings/travel, are there any lessons from the pandemic re future modalities?	Paragraph inserted.

PARAGRAPH NUMBER	REFERENCE TEXT	COMMENTS	GEF-IEO RESPONSE
38 and 40	*Entire paragraphs*	These two paragraphs are somewhat at odds with each other. There is a highlighting of the value and limitations of the voluntary nature of IPAG. At the same time, there is a call to expand their role and to dive in on particular projects or programs. While this is an admirable idea, it would seem that would be the responsibility of the agencies in implementation and, importantly, in paying them for their time. Nothing stops the agencies from engaging IPAG members in this way.	Reconciled.
37	*"IPAG is holding side events"*	While it is a bit pedantic, I don't believe the IPAG itself has ever held a side event (with the possible exception of the GEF Assembly). IPAG members have held side events and the GEF has held side events on our work with IPLCs with the participation of IPAG and with their guidance and direction, but I'm not sure it's the right characterization.	Adjusted.
41	*Placing an indigenous person in a cultural advisor role at the GEF Secretariat - to support IPAG and be resource for engagement with indigenous peoples across the programming areas*	This does not seem to flow from the observations. Is it to achieve knowledge and learning objectives or programming ones, how relate to Agency resources, etc? Related to this, and on observations for additional consultant support and more meetings, what are implications for GEFSEC budgets?	Agreed, it is not really an IPAG organizational adaptation; but it was noted. Have changed the sentence introducing the list to say "role" instead of "organization".

Coherence across Policies

PARAGRAPH NUMBER	REFERENCE TEXT	COMMENTS	GEF-IEO RESPONSE
Page 2 (para 7)	*"Only the Policy on Gender Equality is explicitly aligned with and referenced in the GEF-7 Programming Directions (GEF 2018. GEF-7 Replenishment Programming Directions, GEF/R.7/19, April 2, 2018): "GEF-7 programming also follows the goals and principles as set out in the GEF's Policy on Gender Equality,*	By design, the Policy does not refer to GEF-7. The GEF Gender Implementation Strategy, however, includes explicit reference to GEF-7 programming directions.	Text slightly adjusted to note that only the gender policy is referenced in the GEF-7 Programming directions (removed "aligned" to avoid confusion)
7	*As above*	The ESS update was referenced in the Policy Recommendations document (not Programming) as part of the GEF7 Replenishment Resolution package.	Footnote added to acknowledge the passing reference to work on the ESS policy update.

PARAGRAPH NUMBER	REFERENCE TEXT	COMMENTS	GEF-IEO RESPONSE
4,8,15, 16 etc.	*missed opportunities for stronger cross referencing across the three policies were noted.*	It would be helpful to understand the practical/operational value-added of cross-references among policies that together already form a GEF-7 policy package. Is there a risk of such references causing issues when one or other is revised, renamed, etc.? Also note that the Policy on stakeholder engagement and Gender equality were developed prior to the Policy on ESS and as such could not reflect the new policy on ESS	The utility of cross-referencing the policies is highlighted in the section of the evaluation that notes areas of misalignment (e.g. safeguards has more specific gender risk requirements than the PGE, and includes requirements for Meaningful Consultations that is missing from PSE). Tighter referencing would help clarify where related requirements need to be addressed coherently. The issue of potential obsolescence of references could be addressed through minor updates, and/or also by reviewing/updating all three policies together as a package.
9, 16	*Interviews with some Agencies discussed the potential for either (i) merging the guidelines for the three GEF policies or (ii) merging all three of these with the GEF Guidelines on the Project and Program Cycle Guidelines* *Areas of misalignment: At various points one policy includes requirements or definitions that are germane to other policies but are not included there*	The program cycle guidelines already include references to the three policies. It would confuse issues too much to merge these three policies with the program cycle guidelines which is very operationally focused. We can explore the options of merging the guidelines for the three policies – there will be pros and cons to doing this.	Text added that merging of the three guidance documents could be considered, noting potential trade-offs (e.g. level of detail).

PARAGRAPH NUMBER	REFERENCE TEXT	COMMENTS	GEF-IEO RESPONSE
16	*Umbrella' cross-linking: Only the Policy on Environmental and Social Safeguards includes a broad 'umbrella' statement on how the three policies are intertwined,*	The Policy on ESS was approved after the policies on SE and GE and as such it makes sense that only the Policy on ESS would clearly indicate the linkages. The key point is that the 3 policies complement each other.	The issue of sequencing is noted, however the other policies could have included statements indicating the complementarity of all three policies, with reference to the previous policy/policies)
19	*Table 2. Key Agency and GEF Secretariat roles and responsibilities per the three GEF Policies* *(the third row from the top, PIF/PFD stage)*	The GEF reviews PFDs/PIFs to assess whether documentation reflects requirement of the policy on stakeholder engagement. Please see para 10 of the Policy on Stakeholder Engagement (GEF/C.53/05/Rev.01), "*At concept stage, project identification forms (PIF)[14] and program framework documents (PFD) are required to identify key stakeholders, including civil society and indigenous peoples, and briefly describe how they will be engaged in project preparation.*"	Text slightly adjusted to note that only the gender policy is referenced in the GEF-7 Programming directions (removed "aligned" to avoid confusion)
19	*Table 2. Key Agency and GEF Secretariat roles and responsibilities per the three GEF Policies* *(the 11th row from the bottom, Implementation)*	The Policy on gender equality does not include requirements on resource allocations for implementation. The Guidance on Gender, however, include specific references to the importance of budgeting and staffing.	Footnote added to acknowledge the passing reference to work on the ESS policy update.

PARAGRAPH NUMBER	REFERENCE TEXT	COMMENTS	GEF-IEO RESPONSE
20	*(Second bullet point)* *Policy on Stakeholder Engagement does not call on the GEF Secretariat to assess whether PFDs/PIFs reflect the policy requirements unlike the other two policies (only at CEO Endorsement/Approval)*	As stated in a comment above, the GEF reviews PFDs/PIFs to assess whether documentation reflects requirement of the policy on stakeholder engagement. Please see para 10 of the Policy on Stakeholder Engagement (GEF/C.53/05/Rev.01), "*At concept stage, project identification forms (PIF)[14] and program framework documents (PFD) are required to identify key stakeholders, including civil society and indigenous peoples, and briefly describe how they will be engaged in project preparation.*"	The utility of cross-referencing the policies is highlighted in the section of the evaluation that notes areas of misalignment (e.g. safeguards has more specific gender risk requirements than the PGE, and includes requirements for Meaningful Consultations that is missing from PSE). Tighter referencing would help clarify where related requirements need to be addressed coherently. The issue of potential obsolescence of references could be addressed through minor updates, and/or also by reviewing/updating all three policies together as a package.
20	*(Third bullet point)* *Policy on Gender Equality does not specify that adequate resources be provided to ensure effective implementation (as noted in the other two policies)*	As stated in a comment above, The Policy on gender equality does not include requirements on resource allocations for implementation. The Guidance on Gender, however, include specific references to the importance of budgeting and staffing.	Text added that merging of the three guidance documents could be considered, noting potential trade-offs (e.g. level of detail).
24	*The lack of more results focused reporting for these two policies hampers the GEF in being able to produce a* ==systematic "roll-up" of impact data== *to present to the Council.*	It is very vague to talk about "systematic roll-up of impact data". The Policies were not designed to include these kind of objectives to inedtify and report on indicators at the portfolio level. These kind of impact data should be discussed as part of GEF's results framework not as part of the policy on ESS or stakeholder engagment.	The issue of sequencing is noted, however the other policies could have included statements indicating the complementarity of all three policies, with reference to the previous policy/policies)