Management Action Records – APR 2006

(Prepared by the GEF Evaluation Office)

Background

1. The Management Action Records (MARs) keep track of the level of adoption of Council's decisions on the basis of evaluations findings and recommendations. The two purposes of the MAR are (a) to provide Council with a record of its decisions on the follow-up of evaluation reports, the proposed management actions, and the actual status of these actions; and (b) to increase the accountability of GEF management regarding Council decisions on monitoring and evaluation issues. The GEF Council approved the format and procedures for the GEF Management Action Records (MAR) at its November 2005 meeting and requested the GEF Evaluation Office prepare updated MARs to be presented to the Council for review and follow up on an annual basis.

2. The rating categories for the progress of adoption of Council Decisions were agreed upon in the consultative process of the Evaluation Office with the GEF Secretariat and the GEF Agencies and are as follows:

- High: Fully adopted and fully incorporated into policy, strategy or operations.
- **Substantial:** Decision largely adopted but not fully incorporated into policy, strategy or operations as yet.
- **Medium:** Adopted in some operational and policy work, but not to a significant degree in key areas.
- **Negligible:** No evidence or plan for adoption, or plan and actions for adoption are in a very preliminary stage.
- N/A: Non-applicable

In this year's exercise, the Evaluation Office found it necessary to introduce a new rating:

- Not possible to verify yet: verification will have to wait until more data is available or proposals have been further developed.

3. The first MARs was presented to Council in June 2006, but the preparatory process was flawed, as a result of which it was impossible for the Evaluation Office to verify the ratings in time for the Council meeting. This year's MARs is the first to present ratings of GEF management and the verification of these ratings by the Evaluation Office. It tracks management actions on Council Decisions based on 8 GEF Evaluation Office reports, including:

- Annual Performance Report 2004 (GEF/ME/C.25/1, May 2005)
- Role of Local Benefits in Global Environmental Programs (GEF/ME/C.27/4, October 2005)
- Annual Performance Report 2005 (GEF/ME/C.28/2/Rev.1, May 2006)
- GEF Country Portfolio Evaluation Costa Rica (GEF/ME/C.28/5, May 2006)
- Evaluation of Incremental Cost Assessment (GEF/ME/C.30/2, November 2006)

- Evaluation of the Experience of Executing Agencies under Expanded Opportunities in the GEF (GEF/ME/C.30/4, November 2006)
- Evaluation of the GEF Activity Cycle and Modalities (GEF/ME/C.30/6, November 2006)
- Evaluation of the GEF Support to Biosafety (GEF/ME/C.28/Inf.1, May 2006)

4. Five older evaluation reports have become overtaken by the recent changes in the GEF and can be considered no longer relevant. Their MARs have been archived.¹

Results

5. The current MARs track management actions on 36 Council decisions. The Evaluation Office rated 33 percent of these decisions as having been adopted by management at high or substantial levels. For three percent of decisions adoption was rated as negligible by the Evaluation Office.

6. The Evaluation Office and management agreed on the rating on progress of adoption for 47 percent of decisions (17 of 36). On the other 53 percent, the Evaluation Office downgraded management's ratings. As shown in Table 1, most disagreement between management and GEF EO's ratings are in the higher levels of adoption ("high" and "substantial"). Many of the lower ratings given by the Office reflect the fact that proposals to Council have yet to be approved by Council. If and when these proposals are approved, substantial adoption may have occurred. For next years' MARs this issue may be discussed further and may lead to additional guidelines.

		GEF EO ratings							
Management ratings	High	Substantial	Medium	Negligible	Not possible to verify yet	Sum of management ratings			
High	5	2	6	0		13			
Substantial		5	8	0	2	15			
Medium			6		1	7			
Negligible				1		1			
Not possible to									
verify yet									
Sum of GEF	5	7	20	1	3	36			

 Table 1: Management and GEF EO rating of Recommendation Adoption Levels

¹ This concerns the following reports:

- GEF's Engagement with the Private Sector (GEF/ME/C.23/Inf.4, May 2004)
- Program Study on Biodiversity (GEF/ME/C/C.24/Inf.1, Nov 2004)
- Program Study on Climate Change (GEF/ME/C.24/Inf.2, Nov 2004)
- Program Study on International Waters (GEF/ME/C.24/Inf.3, Nov 2004)
- Review of the GEF Operational Program 12: Integrated Ecosystem Management (GEF/ME/C.25/5, May 2005)

The MAR on GEF's Engagement with the Private Sector was archived because the new approach to private sector that is being proposed by the GEF Secretariat makes previous recommendations on this issue obsolete. The other reports have been overtaken by the new Focal Areas Strategies that the GEF Secretariat is presenting to Council. Recommendations from the Program Studies were also incorporated into the GEF Replenishment Agreement and the recommendations of the GEF Third Overall Performance Study.

EO ratings

NOTE: Highlighted fields show agreement between management and GEF EO; fields to the right of the diagonal represent higher rating by the management than by GEF EO (except in the case of "not possible to verify yet"). The last column shows the sum of ratings in each category by management; the last row shows the sum of ratings by GEF EO.

7. There are several council decisions on which progress in adoption by management is significant. These include the adoption of the Terminal Evaluation Review processes by the Evaluation Offices of UNDP and UNEP, and the GEF Secretariat proposal to provide a 'level playing field' for implementing and Executing Agencies.

8. The only decision whose adoption was assessed as "negligible" by both GEF Management and the Evaluation Office relates to the Council's June 2005 decision requesting increased transparency in the GEF project approval process through an improved Management Information System. Further work on this system is still in its early stages and had not led to any visible improvement in the information that is available on where proposals are in the approval process. The Evaluation Office reiterates its viewpoint that making information available in a transparent way is not rocket science. It needs discipline in gathering information and it needs staff efforts to present this information diligently on the web site in an accessible format. It does not have to wait until software is written and a full system is in place to manage information.

9. Another issue that the Evaluation Office assesses needs to be better adopted is the Council decision to integrate local benefits in a more systematical way into all stages of the GEF project cycle. Management rates the adoption of this decision as "high", but the Evaluation Office concludes that the adoption rate for this Council's decision is "medium". The Office's assessment is based on this year's APR findings, which indicate that the integration of social issues into supervision of GEF projects, when appropriate, has been insufficient in UNDP and UNEP. Furthermore, the GEF Secretariat still lacks expertise in this area – there has been no social scientist post in the GEF Secretariat since 2003.

10. The Evaluation Office also notes that the quality of terminal evaluations is still in need of improvement. Recommendations from both the 2004 and 2005 Annual Performance Reports call for improved quality of terminal evaluations, but even though GEF agencies have developed and tested terminal evaluations review processes, they still need to ensure that terminal evaluation reports include adequate information on sustainability of outcomes, quality of M&E systems and reporting on cofinancing.

Conclusion

11. The many changes in the MARs from last year's version to this year's version are an indication of a dynamic GEF, going through a process of change. For five older evaluation reports the Council decisions have been overtaken by new developments, in which tracking of the adoption of the old Council decisions no longer makes sense. This does not mean that the "lessons from past experience" of these older reports have been overlooked or are now forgotten – rather, they have been integrated into more recent efforts by the new CEO to renew the strategies of the GEF and fulfill the GEF-4

replenishment agreement. Furthermore, in general the difference in rating of the level of adoption between the Evaluation Office and the GEF Management does not reflect a disagreement about the direction of the adoption. In other words: in most cases the Evaluation Office feels that Management is on track – just not as far towards the end station as Management considers itself to be. In many cases this is because Management is hopefully expecting the Council to agree with its proposals, whereas the Evaluation Office will await the Council's decisions on these proposals.

12. The lack of progress in providing transparency on management information in the GEF has to be lamented. A Council decision in 2005 and a reminder of Council in 2006 have not yet been adequately met by the Secretariat, which is fully aware of the situation, and has rated its own performance in this regard as negligible. The Evaluation Office again asks attention for the fact that making management information available in a transparent manner is not a question of rocket science or of sophisticated software. It requires sufficient human resources, energy and dedication.

Management Action Records

Attached are eight Management Action Records including:

- Annual Performance Report 2004 (GEF/ME/C.25/1, May 2005)
- Role of Local Benefits in Global Environmental Programs (GEF/ME/C.27/4, October 2005)
- Annual Performance Report 2005 (GEF/ME/C.28/2/Rev.1, May 2006)
- GEF Country Portfolio Evaluation Costa Rica (GEF/ME/C.28/5, May 2006)
- Evaluation of Incremental Cost Assessment (GEF/ME/C.30/2, November 2006)
- Evaluation of the Experience of Executing Agencies under Expanded Opportunities in the GEF (GEF/ME/C.30/4, November 2006)
- Evaluation of the GEF Activity Cycle and Modalities (GEF/ME/C.30/6, November 2006)
- Evaluation of the GEF Support to Biosafety (GEF/ME/C.28/Inf.1, May 2006)

Management Action Record – April 2007 Annual Performance Report 2004 (GEF/ME/C.25/1, May 2005) Management Response (GEF/ME/C.25/2, May 2005)

Recommendation	Management Response	Council Decision		Rating in Progr	ess of Ado	ption*
			Mgmt	Comments	GEF EO	Comments
The transparency of the GEF project approvals process should be increased. The GEFSEC and IAs should make project proposal status information available to proponents through internet accessible databases and project tracking tools.	We also agree with the need for increased transparency of the approval process, including the exploration of alternatives such as internet-accessible databases, as well as an active management approach to the project approval process. Some IAs, however, have pointed that the client-oriented nature of projects preparation makes the process quite transparent already.	June 2005 – Decision on Agenda Item 5(b) - (a) The transparency of the GEF project approval process should be increased. The GEF Secretariat is requested to prepare for Council review, options for making project proposal status information available to proponents through Internet accessible databases and project tracking tools. The GEF Secretariat, Implementing Agencies are also requested to update project information on the current projects;	Negligible Plus	The Council approved a special initiative budget in November 2005 for developing a new Management Information System for the GEF. The detailed needs assessment for the MIS took time and was completed only in December 2006. Meanwhile, changes were recommended in the technology architecture to contain costs. Also, it was decided to undertake almost all of the MIS development in-house rather than contracting with a firm. A consultant has been selected to assist the Secretariat in this task, and the exercise is expected to be completed by December 2007.	Negligible	There has been no change in the availability of project status information to proponents.
GEFSEC should institute an active management approach to the project approvals process, including accountability for processing time standards within the GEFSEC and IAs.	This is a useful and well designed one-time study that provides important and balanced findings regarding the causes for delays in GEF project preparation, even though it downplays important sources of delay, such as the time it takes to obtain endorsement letters from focal points, and the significance of the additional time required for GEF specific	June 2005 – Decision on Agenda Item 5(b) - (b) GEFSEC should, in consultation with the IAs and EAs, develop: (i) an active management approach to the project approvals process, including accountability for processing time standards within the	Substantial	As part of the new project cycle proposal (GEF/C.31/7) to be submitted for Council approval, June 2007, project review criteria as well as criteria for the cancellation, suspension or termination of projects have been explicitly developed. By	Medium	The Project cycle proposal that will be presented for June Council approval includes an overall time standard of 22 months for the approval of GEF projects from PIF approval to endorsement by the CEO Accountability may still remain an issue since there

Recommendation	Management Response	Council Decision	n Rating in Progress of Adoption*			
			Mgmt	Comments	GEF EO	Comments
	processes together with the innovative characteristics of many GEF projects that can require additional time for design. We agree with the recommendation for better delineation of roles, including focusing Council priorities on policy and program matters rather than project reviews. The increased technical scrutiny by Council often duplicates the technical review functions of the IA safeguard teams as well as the GEF Secretariat.	GEFSEC and IAs; (ii) a system, including criteria, for actively reviewing projects to determine which should be canceled, and (iii) report annually to the Council on progress in these areas;	ingin	streamlining the processing time for projects to an average of 22 months, the proposed project cycle provides a more transparent project approval process. In addition, Council has requested a results-based management framework (RBM) (GEF/C.31/11) be submitted at the June 2007 meeting. Through the new RBM framework, the GEF SEC will monitor processing times as part of an active management approach to the project		are no detailed processing time standards for GEF or agencies yet.
UNDP and UNEP should set in place terminal evaluation review processes for GEF projects to improve their quality and meet the concerns of the GEF.	This important section develops a robust methodology to assess the quality of the terminal evaluations conducted by the Implementing Agencies, although we question the validity of applying such methodology retroactively. Such methodology is useful to track the quality of terminal evaluations over time and if it is to be used in the future, this needs to be communicated to the IAs explicitly. In addition, we note that the small sample size limits the validity of statistical analyses on these results. We agree with the EO that the observed decrease in UNDP ratings, for example, cannot necessarily be considered a trend because the sample size is based on six terminal evaluations only.	June 2005 – Decision on Agenda Item 5(b) - (c) UNDP and UNEP are requested to set in place terminal evaluation review processes for GEF projects to improve their quality and meet the concerns of the GEF Council about the quality and credibility of their terminal evaluations and ratings. EO is requested to review consistency of evaluations and ratings. The IAs and EAs are also requested to include in their project terminal evaluations an assessment of project monitoring and evaluation systems;	Substantial	approvals process. UNDP's independent EO will pilot a quality review of TER's starting in April 2007. The results of this pilot will allow UNDP EO to put in place a formal, longer term quality review process later this year. UNEP's Evaluation and Oversight Unit has put in place a comprehensive quality review system for terminal evaluations. The system is fully compliant with the criteria specified in the GEF Evaluation policy. Terminal Evaluation reports are being submitted to GEF EO with a copy of the UNEP EOU quality review. An assessment of project monitoring and evaluation systems is fully	Medium	Regarding the first part of the Council request, UNDP has develop and tested a terminal evaluation review process and plans to submit terminal evaluation reviews to EO for FY20 07. UNEP has also developed and tested a terminal evaluation review process and has submitted reviews to EO in FY 2006. Regarding the second Council request: The 2006 APR will report that all GEF agencies need to ensure that terminal evaluation reports include adequate information on sustainability of outcomes, quality of M&E systems and reporting on cofinancing

Recommendation	Management Response	Council Decision		Rating in Prog	ress of Add	ption*
			Mgmt	Comments	GEF EO	Comments
Recommendations to improve	We agree that there has been a	June 2005 – Decision	Substantial	integrated into the terminal evaluation process and explicit in the evaluation report. In the new project cycle	Medium	The Project Cycle proposal
project M&E systems have been issued in the past, as well as request to include an assessment of project M&E systems in all terminal evaluation reports. While there have been advances in upgrading project M&E systems, there is still considerable room for improvement, and therefore the Office considers that these recommendations continue to be valid.	marked improvement in the number of projects with adequate M&E systems, as well as the quality of such systems. Although the report calls for further improvements, it is important to point out that many remaining weaknesses are germane to some of the focal areas and cannot be attributed to the GEF alone. For example, measuring biodiversity impacts is impossible given the current levels of scientific uncertainty; instead, it is widely accepted that certain outcomes can be used as strong proxies for impacts, such as the presence of effective managed protected areas, maintenance of habitat integrity, etc.	on Agenda Item 5(b) – (d) □ The GEFSEC is requested to ensure that projects included in the work programs meet minimum monitoring and evaluation standards.		proposal (GEF/C.31/7) all projects must meet the M&E minimum standards established by Council (GEF M&E Policy, 2/06). Moreover, a project's results-framework (logframe) must include indicators and targets at project objective and outcome levels that show the project's contribution to achieving the expected objective and outcomes of the focal area for the GEF-4 replenishment period.		presented for approval to the June 2007 Council indicates that at CEO endorsement the GEF Secretariat will review project proposals for compliance with GEF M&E policy provisions.

*Level of adoption may be rated in six ways: **High:** Fully adopted and fully incorporated into policy, strategy or operations; **Substantial:** Decision largely adopted but not fully incorporated into policy, strategy or operations as yet; **Medium:** Adopted in some operational and policy work, but not to a significant degree in key areas; **Negligible:** No evidence or plan for adoption, or plan and actions for adoption are in a very preliminary stage; **N/A:** Non-applicable

In this year's exercise, the Evaluation Office found it necessary to introduce a new rating: Not possible to verify yet: verification will have to wait until more data is available or proposals have been further developed.

Management Action Record – April 2007 Role of Local Benefits in Global Environmental Programs Part One: Nature and Conclusions of the Study (GEF/ME/C.27/4, October 2005) Management Response (GEF/ME/C.27/5, Oct 2005)

Recommendation	Management Response	Council Decision		Rating in Prog	ress of Ad	option*
			Mgmt	Comments	GEF EO	Comments
1. Where local benefits are an essential means to achieve and sustain global benefits, the GEF portfolio should integrate them more strongly into its programming.	We agree with this recommendation. As noted above, the GEF has substantially strengthened its ability to address global-local linkages in our programming through its GEF-3 and 4 Programming Documents, and strategic priority setting.	Nov 2005 - Decision on Agenda item 7(d) 1. Where local benefits are an essential means to achieve and sustain global benefits, these should be more systematically addressed in all stages of the project cycle in GEF activities.	Medium	The draft GEF-4 strategic document of each focal area has highlighted and recognized the linkages between global and local benefits, when relevant. The updated project review criteria guideline (Oct 2006) clearly require analysis and relevant activities on local benefits as part of the project design, when relevant.	Medium	Agreed. The new focal area strategies also seek to improve inter-disciplinary perspectives (including social issues) in GEF operations. However, there is no evidence that this aspect has been systematically operationalized. GEF Sec and IAs/ExAs will need to closely monitor the extent to which the new emphasis on linkages is put into practice
2. Integration of local benefits should be more systematically carried forward into all stages of the project cycle	We agree with this recommendation, particularly in those instances where local benefits are essential means to achieve and sustain global benefits. For the past years, we have made initial efforts in incorporating approaches and tools within the project cycle to strengthen the global-local benefit linkages. For example, stakeholder identification and development of public participation strategies are required in appropriate stages of the project cycle. Social assessment and social experts are utilized during project preparation, implementation, and monitoring and evaluation period. We will review and strengthen these approaches through the ongoing	Nov 2005 - Decision on Agenda item 7(d) 1. Where local benefits are an essential means to achieve and sustain global benefits, these should be more systematically addressed in all stages of the project cycle in GEF activities.	High	As noted above, the updated project review criteria guideline (Oct 2006) clearly require analysis and relevant activities on local benefits as part of the project design, when relevant.	Medium	Agreed. This year's APR indicates that the integration of social issues into supervision of GEF projects has been more systematic in World Bank projects than in those of UNDP and UNEP. Furthermore, GEF Secretariat still lacks expertise in this area – there has been no social scientist post in the GEF Secretariat since 2003.

Recommendation	Management Response	Council Decision	Rating in Progress of Adoption*				
			Mgmt	Comments	GEF EO	Comments	
	review of the GEF project cycle and appraisal criteria, while making sure that these remain simple and do not make the project review process more complex.						
3. GEF activities should include processes for dealing with trade-offs between global and local benefits in situations where win-win results do not materialize.	We agree with the study that the assumption that projects involving the GEF would always result in "win-win" gains in both development and global environmental management, is not realistic. Some of the projects require an assessment of the potential for "win-win" gains or "trade-off" outcomes between global environmental and local livelihood benefits. The issue is discussed as part of the project design and sustainability analysis for each project at appropriate stages of the project cycle.	Nov 2005 - <i>Decision on</i> <i>Agenda item 7(d)</i> 2. GEF activities should include processes for dealing with trade-offs between global and local benefits in situations where win-win results do not materialize.	Medium	All focal areas have discussed the issue of trade-offs in their interventions during the revision process of the focal area strategies. The land degradation focal area has requested STAP to conduct a study on trade-offs between global environmental and local livelihood issues and how to assess these trade-offs for better decision making. In future, these issues will be discussed as part of the project design and the sustainability analysis.	Medium	Agreed – However, attention to trade-offs should not be restricted to the design stage. Project monitoring and supervision, as well as mid-term and final evaluations, should assess the actual achievements of trade-off strategies during project implementation.	
4. In order to strengthen generation of linkages between local and global benefits, the GEF should ensure adequate involvement of expertise on social and institutional issues at all levels of the portfolio.	As the findings of the study indicate, the involvement of expertise on social and institutional issues may have been incoherent during the early days of GEF programming. Today, it is a regular practice at every stage of the project cycle to involve appropriate expertise and tools related to social and institutional issues by all Implementing Agencies. Stakeholder consultation, participatory rural assessments, and social assessments are widely used in GEF projects by structuring multi-disciplinary project teams that include social scientists. In fact, the study's own	Nov 2005 - <i>Decision on</i> <i>Agenda item 7(d)</i> 3. In order to strengthen generation of linkages between local and global benefits, the GEF should ensure adequate involvement of expertise on social and institutional issues at all levels of the portfolio.	High	The updated project review criteria guideline (Oct 2006) clearly require information from socio-economic and institutional assessments as part of the project design, when relevant. As already noted in the management response, 80% of the recently approved GEF projects involve these assessments.	Substantial	This is encouraging, but such assessments need to be followed up during implementation and evaluation. This year's APR indicates that social expertise is still lacking or inconsistently applied in some projects.	

Recommendation	Management Response	Council Decision	Rating in Progress of Adoption*				
			Mgmt	Comments	GEF EO	Comments	
	data show that 80 percent of the most recently approved projects have involved social assessment, while it was only 39 percent in the study's overall sample. The ongoing review of the GEF project cycle and appraisal criteria will assess the relevance of having these tools and approaches as operational requirements for future projects.						

Management Action Record – April 2007 Annual Performance Report 2005 (GEF/ME/C.28/2/Rev.1, May 2006) Management Response (GEF/ME/C.28/3, May 2006)

Recommendation	Management Response	Council Decision		Rating in Prog	ress of Ado	ption *
	0		Mgmt	Comments	GEF EO	Comments
The GEF Secretariat should redraft project review guidelines and standards to ensure compliance with the new M&E minimum requirements. Further consideration should also be given to ways to enhance the contribution of STAP reviews during the process.	The Secretariat is redrafting project review guidelines and standards to ensure compliance with the new M&E minimum requirements, including more guidance to Secretariat program managers for reviewing M&E design in project documentation. STAP is also considering ways to enhance the contribution of STAP roster reviews during the process.	Jun.2006 - Decision on Agenda Item 4 - The GEF Secretariat should redraft project review guidelines and standards to ensure compliance with the new M&E minimum requirements. Further consideration should also be given to ways to enhance the contribution of STAP reviews during the process.	Substantial	Project review guidelines and standards have been redrafted as part of the proposed new project cycle (GEF/C.31/7). All projects must meet the M&E minimum requirements established by Council (GEF M&E Policy, 2/06). In order to enhance the contribution of STAP reviews during the project review process, it is proposed that STAP in parallel with the GEF SEC review projects at the PIF stage. Involving the STAP at the upstream end of the project cycle will allow the STAP to recommend follow-up action that could be used by the GEF SEC to condition further action by the proponent, which would further develop the project concept with the help of STAP advice and STAP-sourced expertise if the PIF were so conditioned.	Substantial	The Project Cycle proposal presented for approval to the June 2007 Council indicates that at CEO endorsement the GEF Secretariat will review project proposals for compliance with GEF M&E policy provisions. The Project Cycle proposal also moves STAP reviews up stream at the time of PIF review.
The GEF Secretariat should support Focal Area Task	We agree with the conclusion that although Focal Area Task Forces	Jun.2006 - Decision on Agenda Item 4 - The	Substantial	Based on the comments and guidance from	Substantial	The GEF secretariat, in consultation with the IAs and
Forces with corporate	have made significant progress in	GEF Secretariat should		Council, the focal area		EAs, has defined a set of
resources to continue the	developing indicators and tracking	support Focal Area Task		strategies were further		indicators for each focal area

Recommendation	Management Response	Council Decision		Rating in Prog	ress of Ad	option *
			Mgmt	Comments	GEF EO	Comments
development of indicators and tracking tools to measure the results of the GEF operations in the various focal areas.	tools at the portfolio level, there remain some technical difficulties to be overcome to adequately address the need to measure and aggregate results at the portfolio level. Reflecting the APR 2005 recommendation that the Secretariat should support Focal Area Task Forces with corporate resources to develop indicators and tracking tools to measure the results of the GEF operations in the various focal areas, a request is being made for a <i>Special</i> <i>Initiative for Results-Management</i> in the FY07 Corporate Budget. This activity would be in line with the on- going efforts to develop a GEF Results Management Framework.	Forces with corporate resources to continue the development of indicators and tracking tools to measure the results of the GEF operations in the various focal areas.		developed in order to sharpen their focus and to harmonize and integrate approaches in the different focal areas. The strategies will be presented at the June 2007 Council meeting (GEF/C.31/10). All focal area strategies have identified focal area performance indicators and targets. The proposed indicators will feed into the work to develop a set of common quantitative indicators and tracking tools for each focal area as requested in the GEF-4 policy recommendations. The Council also approved a special initiative budget in June 2006 to support the development of indicators in the context of the GEF results- based management framework.		which have been included as part of the Focal Area Strategies that will be presented for approval in the June 2007 Council. The GEF Secretariat made available corporate resources to support the development of program indicators
No recommendation	N/A	Jun.2006 - Decision on Agenda Item 4 - The Implementing and Executing Agencies should share mid-term and terminal evaluations with the GEF focal points in a timely way.	Medium	For the first time, the 2006 UNDP-GEF PIR format includes a provision for OFP signature. OFPs now have an opportunity to review the annual progress of UNDP-GEF projects. In 2007, UNDP will institutionalize a system for also sharing	Medium	All IAs have provided guidance as to share midterm and terminal evaluations with the GEF focal pints in a timely way.

Recommendation	Management Response	Council Decision	Rating in Progress of Adoption *				
			Mgmt	Comments	GEF EO	Comments	
				evaluation reports with			
				OFPs.			
				The World Bank has			
				instructed its project task			
				teams to ensure that			
				GEF Operational Focal			
				Points are copied on			
				aide memoire for			
				supervision missions			
				including MTRs. It is a			
				Bank legal requirement			
				that the recipient			
				governments contribute			
				to terminal evaluations			
				and Task Teams have			
				been instructed to			
				ensure that Focal Points			
				are provided with the			
				terminal evaluation			
				reports.			
				IDD does not have any			
				IDB does not have any project at mid-term			
				neither at final			
				evaluation stage.			
				Whenever this occurs,			
				we will share the reports			
				with the GEF Focal			
				Points.			
				UNEP is sharing the			
				terms of reference of			
				Mid-term and Terminal			
				Evaluations with the			
				relevant GEF Focal			
				Point(s). UNEP is also			
				sharing with the GEF			
				Focal Points the			
				Evaluation reports.			
				Whenever possible, and			
				as applicable, evaluators			
				are being requested to			
				debrief GEF Focal			

Recommendation	Management Response	Council Decision	Rating in Progress of Adoption *				
			Mgmt	Comments	GEF EO	Comments	
				Points before leaving the country(ies). This is reflected in the terms of reference for the evaluators.			
No recommendation	N/A	Jun.2006 - Decision on Agenda Item 4 - GEF partner agencies need to continue to follow-up on the recommendations made in last year's APR regarding the need to improve terminal evaluation reports.	Substantial	UNDP independent EO provides feedback to UNDP GEF Regional Technical Advisors on Evaluation TORs and draft reports. This feedback will become more systematic and extend to terminal evaluation reports once the quality review is initiated in April 2007. The quality of UNEP- GEF Terminal Evaluation reports is steadily improving as a result of the implementation of the TE quality review system by the Evaluation and Oversight Unit The GEFEO reported in its 2006 APR an 86% satisfactory rate for the quality of World Bank terminal evaluation reports.	Medium	While IAs have taken steps that are likely to lead to improvements in TEs, the 2006 APR that will be presented to Council in June 2006 concludes that all GEF agencies need to ensure that terminal evaluation reports include adequate information on sustainability of outcomes, quality of M&E systems and reporting on cofinancing	

Management Action Record – April 2007 GEF Country Portfolio Evaluation – Costa Rica (GEF/ME/C.28/5, May 2006) No Management Response

Recommendation	Management Response	Council Decision		Rating in Pro	gress of A	doption *
			Mgmt	Comments	GEF EO	Comments
The GEF Secretariat needs to improve the information mechanisms in the GEF, most notably the GEF website, to make essential operational information available at the national level.	No Management Response	Jun. 2005 - Decision on Agenda Item 6 - The GEF Secretariat is requested to take steps to improve the information mechanisms in the GEF, most notably the GEF website, to make essential operational information available at the national level.	Substantial	The GEF website is being upgraded with a country portal to provide information related to GEF projects at the country-level. When the MIS is complete, this portal will be connected to the GEF MIS to provide real time information regarding the RAF resource allocations and uses.	Medium	The new GEF website has been launched but information available is still basically the same. The implementation of MIS has not started. The GEF Secretariat PMIS data and its website portal (GEF database in the GEF website) are still not reliable. The same problems were found by the recently completed evaluations of the GEF support to Samoa and the Philippines. Stakeholders in neither country have knowledge of any changes (or proposals of changes) to MIS or website. This was also corroborated in the Joint Evaluation of the GEF Activity Cycle.
Council reiterates its decision of June 2005 that "the transparency of the GEF project approval process should be increased" and requests the GEF secretariat to reinforce its efforts to improve this transparency.	No Management response	Jun. 2005 - Decision on Agenda Item 6 - Council reiterates its decision of June 2005 that "the transparency of the GEF project approval process should be increased" and requests the GEF Secretariat to reinforce its efforts to improve this transparency.	Medium	The new GEF project cycle proposed in GEF/C.31/7, provides for a streamlined and transparent project approval system. Together with the MIS, the GEF and the agencies should be able to provide countries with access to project-tracking and approval information.	Medium	The proposed project cycle, to be discussed by Council in June 2007, may improve the transparency of the process. Again, the recent evaluations of the GEF support in the Philippines and Samoa concluded that there is still a serious issue with the transparency of the system. Many stakeholders in these two countries were also confused with the implementation of the RAF.

*Level of adoption may be rated in six ways: **High:** Fully adopted and fully incorporated into policy, strategy or operations; **Substantial:** Decision largely adopted but not fully incorporated into policy, strategy or operations; **Substantial:** Decision largely adopted but not fully incorporated into policy, strategy or operations; **Substantial:** Decision largely adopted but not fully incorporated into policy, strategy or operations; **Substantial:** Decision largely adopted but not fully incorporated into policy, strategy or operations; **Substantial:** Decision largely adopted but not fully incorporated into policy, strategy or operations; **Substantial:** Decision largely adopted but not fully incorporated into policy, strategy or operations; **Substantial:** Decision largely adopted but not fully incorporated into policy, strategy or operations; **Substantial:** Decision largely adopted but not fully incorporated into policy, strategy or operations; **Substantial:** Decision largely adopted but not fully incorporated into policy, strategy or operations; **Substantial:** Decision largely adopted but not fully incorporated into policy, strategy or operations; **Substantial:** Decision largely adopted but not fully incorporated into policy, strategy or operations; **Substantial:** Decision largely adopted but not fully incorporated into policy, strategy or operations; **Substantial:** Decision largely adopted but not fully incorporated into policy, strategy or operations; **Substantial:** Decision largely adopted but not fully incorporated into policy, strategy or operations; **Substantial:** Decision largely adopted but not fully incorporated into policy, strategy or operations; **Substantial:** Decision largely adopted but not fully incorporated into policy, strategy or operations; **Substantial:** Decision largely adopted but not fully ado

In this year's exercise, the Evaluation Office found it necessary to introduce a new rating: Not possible to verify yet: verification will have to wait until more data is available or proposals have been further developed.

Management Action Record – April 2007 Evaluation of Incremental Cost Assessment (GEF/ME/C.30/2, Nov 2006) Management Response (GEF/ME/C.30/3, Nov.2006)

Recommendation	Management Response	Council Decision		Rating in Progr	ess of Ador	otion *
			Mgmt	Comments	GEF EO	Comments
The current incremental cost assessment and reporting should be dropped as requirements for GEF projects;	We agree with the recommendations of the Evaluation, and would like to propose that the current way of applying the incremental cost principle, especially the assessment and reporting be scrapped and a more pragmatic and strategic approach be adopted. This new approach is rooted in incremental reasoning and the focal area strategies approved by the GEF Council for each replenishment period.	Dec. 2006 - Decision on Agenda Item 7 - The current incremental cost assessment and reporting requirements for GEF project proposals should be reformed so as to result in a simplified demonstration of the project baseline, incremental costs and co-funding;	Substantial	A new procedure for assessing the incremental costs of a project and GEF financing is proposed to Council in the project cycle document (GEF/C.31/12). It is based on the recommendations of the EO and the elements identified in the GEF Management response. The new ICA proposal is rooted in a strong incremental reasoning and contribution of the project to the targets for the focal area described in the focal area strategies. This will enable the key stakeholders to negotiate the agreed incremental cost for interventions for which a clear spilt of activities producing either GEB or national benefits only is difficult to make due to the nature of the intervention. Once the new ICA has been approved as part of the new project cycle by Council, the GEF	Substantial	As requested by Council, a proposal with optional guidance on the application of the IC principle has been prepared for council consideration at its June 2007 meeting. The project cycle document does not include guidelines on incremental cost.

Recommendation	Management Response	Council Decision	Rating in Progress of Adoption *			
			Mgmt	Comments	GEF EO	Comments
				will work on a comprehensive outreach program reflecting on all elements of the new GEF project cycle in order to create awareness about key policies and rules for requesting GEF support.		
The incremental reasoning in project objectives and design should be explicitly recognized in appropriate documentation, particularly at the project concept stage, during implementation and at completion;	See above	Dec. 2006 - Decision on Agenda Item 7 – The incremental reasoning in project objectives and design should be explicitly addressed in appropriate documentation, particularly at the project concept stage, during implementation and at completion;	Substantial	See above	Not possible to verify yet	The Council document to be discussed in June 2007 considers these elements but the actual fulfillment of the recommendation will not be verified until the Council approves the document and then the GEF system implements the proposal. GEFEO will be able to verify the accomplishment of this recommendation after Council approves the new IC paper and the new procedures are applied.
No recommendation	N/A	Dec. 2006 - Decision on Agenda Item 7 - monitoring for progress towards achieving global environmental benefits and for achieving co-funding should be included in Project Information Reports and the Portfolio Performance Report;	Medium	The GEF results-based management framework includes provisions for an annual portfolio performance review that will monitor project progress towards achieving global environmental benefits.	Not possible to verify yet	Same as above. The proposed Council document deals appropriately with this issue but no implementation yet.

Recommendation	Management Response	Council Decision		Rating in Progr	ess of Adop	otion *
			Mgmt	Comments	GEF EO	Comments
No recommendation	N/A	Dec. 2006 - Decision on Agenda Item 7 - terminal evaluations should evaluate achievement of global environmental benefits and co-funding,	Substantial	UNDP-GEF guidance to Regional Technical Advisors is clear on the need for terminal evaluations to evaluate the achievement of global environmental benefits and co-funding. APR findings show that most UNDP terminal evaluation reports do contain this information. The TE quality review which will soon be initiated will screen for these elements. Achievement of global environmental benefits and co-funding are fully integrated into all UNEP- GEF evaluations.	Medium	GEF EO terminal evaluation guidance includes an assessment of achievement global objectives. Up to now, reviews of terminal evaluations (many of them prepared before guidance) do not include information, reporting or assessment of results at the global environmental benefit level.
On-going efforts need to be strengthened to have a better identification of global environmental benefits in GEF activities, including improved dissemination and raising of awareness of the focal area strategic priorities and objectives.	The GEF will develop an outreach program on operational issues that will facilitate the dissemination and awareness-raising on agreed global environmental benefits, focal area strategic priorities and objectives. This will enable countries to fully participate in the dialogue on negotiating the agreed incremental costs of achieving/optimizing global environmental benefits in GEF- supported interventions.	Dec. 2006 - Decision on Agenda Item 7 - On- going efforts should be strengthened to have a better identification of global environmental benefits in GEF activities, including improved dissemination and raising of awareness of the focal area strategic priorities and objectives.	Medium	Through the National Dialogue Initiative, the GEF and its partners help countries understand the principle of incrementality and apply it in a pragmatic manner in developing projects that will deliver global environmental benefits.	Medium	The new strategic priorities to be presented to Council June have better focus and clarity. Public awareness on the issue of incrementality is still not present.
See above	The GEF Secretariat, together with the GEF agency partners will meet in the coming months to refine the proposed new approach to incremental costs and develop an outreach program on related operational issues. A proposal will be presented to the Council for	Dec. 2006 - Decision on Agenda Item 7 - The Council requests the GEF Secretariat to incorporate in the paper on the revised project cycle to be presented to the Council in June	High	The new project cycle document (GEF/C.31/7) includes guidelines to implement the new approach to incremental cost assessment.	Substantial	A document on operational guidance for the application of the IC principle has been prepared for Council discussion at its June 2007 meeting. This document proposes how to incorporate this principle in the project

Recommendation	Management Response	Council Decision	Rating in Progress of Adoption *			ption *
			Mgmt	Comments	GEF EO	Comments
	review at its June 2007 meeting.	2007, new operational guidelines to implement the above sub- paragraphs.				cycle. The project cycle paper itself does not include the incremental cost principle.

*Level of adoption may be rated in six ways: **High:** Fully adopted and fully incorporated into policy, strategy or operations; **Substantial:** Decision largely adopted but not fully incorporated into policy, strategy or operations as yet; **Medium:** Adopted in some operational and policy work, but not to a significant degree in key areas; **Negligible:** No evidence or plan for adoption, or plan and actions for adoption are in a very preliminary stage; **N/A:** Non-applicable

In this year's exercise, the Evaluation Office found it necessary to introduce a new rating: Not possible to verify yet: verification will have to wait until more data is available or proposals have been further developed.

Management Action Record – April 2007

Evaluation of the Experience of Executing Agencies under Expanded Opportunities in the GEF (GEF/ME/C.30/4, Nov 2006) Management Response (GEF/ME/C.30/5, Nov 2006)

Recommendation	Management Response	Council Decision		Rating in Prog	ress of Ad	option *
			Mgmt	Comments	GEF EO	Comments
The GEF Secretariat, in collaboration with the GEF agencies should: b. provide a "level playing field" for Implementing and Executing Agencies.	The seven Executing Agencies under Expanded Opportunities will be granted direct access to GEF funding based on their comparative advantages;	Dec. 2006 - Decision on Agenda Item 16 (see above) - The Executing Agencies will be granted direct access to GEF funding based on their comparative advantages.	High	At the December 2006 Council meeting, based on Secretariat proposal, Council approved a policy of direct access to all Executing Agencies based on their comparative advantages. A document clarifying comparative advantages (GEF/C.31/5) has been submitted to the June 2007 Council meeting for review.	High	The actual fulfillment of the recommendation will not be verified until the GEF system implements the proposal.
See above	The current corporate budget for the Implementing Agencies will be abolished as of FY08;	Dec. 2006 - Decision on Agenda Item 16 - the corporate budget of the Implementing Agencies will be eliminated as of FY08	High	Corporate budget will not be requested beginning FY08.	High	The decision makes the playing field more equal. In terms of resources, the field will not be fully level until the ExA portfolio is of such a scale as to generate fees of scale to support portfolio and corporate efforts.
See above	The project cycle management fee applicable to all GEF agencies will be increased from 9 percent to 10 percent;	Dec. 2006 - Decision on Agenda Item 16 - The project cycle management fee for all GEF Implementing and Executing Agencies will be increased from 9 percent to 10 percent, with a cap that will ensure that no agency receives more administrative support than under the current system of fees and corporate budget. This increased fee will be applied immediately	High	The policy of a fee of 10 percent has been implemented with immediate effect for the Executing Agencies, and will be applied for the Implementing Agencies beginning FY08.	High	See above

Recommendation	Management Response	Council Decision	Rating in Progress of Adoption *			
			Mgmt	Comments	GEF EO	Comments
See above	The increased fee of 1 percent will be used by all GEF agencies to contribute to the corrects activities of the GEF	to projects managed by the Executing Agencies. For projects managed by the Implementing Agencies, the 10 percent fee will be applied beginning in FY08 when the corporate budget for the Implementing Agencies will be eliminated. The total fee amount for any Implementing Agency in a fiscal year will be capped at what it would have received under the present system of a 9 percent fee plus \$3 million in the corporate budget; Dec. 2006 - Decision on Agenda Item 16 - GEF Implementing and Executing Agencies will	High	Beginning January 2007, all Implementing and Executing Agencies	High	The Executing Agencies have been able to participate more actively, to varying
	corporate activities of the GEF.	Executing Agencies will participate in the corporate activities outlined in annex 2 of document GEF/C.30/9;		have been participating in GEF corporate activities.		degrees.
See above	All GEF agencies should focus their involvement in GEF project activities within their respective comparative advantages and assigned primary roles	Dec. 2006 - Decision on Agenda Item 16 - GEF Implementing and Executing Agencies will focus their involvement in GEF project activities within their respective comparative advantages and assigned primary roles which will be further elaborated upon in a paper to be prepared by the Secretariat for the next Council meeting.	Substantial	A document clarifying comparative advantages of the agencies have been submitted for Council review for the June 2007 meeting.	Substantial	The actual fulfillment will not be verified until the Council approves the document. As per the evaluation, the issue was not one of the ExAs stretching their comparative advantage, but of the rules not permitting them to act in areas of advantage. Recommendation met to the extent that the new comparative advantages recognize Executing Agencies' areas of work.
						Agencies aleas of work.

Recommendation	Management Response	Council Decision	Rating in Progress of Adoption *			
			Mgmt	Comments	GEF EO	Comments
	comparative advantages during the Project Concept Review.	comparative advantage of a GEF Implementing and Executing Agency to manage a proposed project will be assessed by the Secretariat, in consultation with the country, during the project concept review.		agency has been incorporated as part of the project concept review.		requirements do not cause further cycle delays and are implemented transparently; these issues were also barriers to Executing Agency involvement.

Management Action Record – April 2007 Evaluation of the GEF Activity Cycle and Modalities (GEF/ME/C.30/6, Nov 2006) Management Response (GEF/ME/C.30/7, Nov 2006)

Recommendation	Management Response	Council Decision		Rating in Prog	ress of Ado	ption *
			Mgmt	Comments	GEF EO	Comments
presented to Council should move towards the strategic level	recommendation that the work program presentation to the Council should be in a strategic context, whereby the Council can review the work program as it applies to GEF strategic directions, country priorities, innovative thrust of the portfolio, etc. The GEF Secretariat and the Agencies will take up this challenge in the coming months as we develop options(s) for a revised project cycle.	on Agenda Item 9 – b) Move the work program from being project-based to being program-based in line with GEF strategies and policies;		document (GEF/C.31/ 7)		presented for approval is in line with the evaluation findings and the decision to make the work program program-based and less project-based. The fulfillment of the recommendation will not be verified until the proposal is approved and implemented. To ensure that this reform is effective, attention must be paid to maintaining discipline in transparency and credibility in eligibility criteria.
Fully documented project proposals should be endorsed by the CEO on a rolling basis	Even under the current project cycle, project documents for CEO endorsement are submitted on a rolling basis while the other stages of the project cycle, including the pipeline entry and work program inclusion follow the GEF project processing calendar, partly aimed at overlapping with the bi-annual Council Meeting. A rethinking of the project cycle will certainly include a review of the possibility of submissions at all stages of the project cycle on a rolling basis. The Secretariat is already implementing an approach where project concept review occurs on a rolling basis.	Dec. 2006 - Decision on Agenda Item 9 – c) Allow projects to be endorsed by the CEO on a rolling basis;	Substantial	See Project Cycle document (GEF/C.31/7)	Medium	This recommendation and related decision was conditional of above changes that would ensure early streamlined identification and strategic work program discussion, that in turn would allow streamlined endorsement. Most conditions for CEO endorsement in C.31/7 are unclearly defined and cannot be transparently assessed. As unclear criteria was one of major causes of elapsed time, there is notable risk of new barriers in the cycle. The actual fulfillment of the recommendation will not be verified until the GEF system implements the proposal.
See all the above	See all the above	Dec. 2006 - Decision on Agenda Item 9 – d) Expedite the project cycle.	Substantial	See Project cycle document (GEF/C.31/7)	Not possible to verify yet	The Council document to be discussed in June 2007 presents elements to expedite, but the actual fulfillment of the recommendation will not be verified until the Council approves the document and

Recommendation	Management Response	Council Decision	Rating in Progress of Adoption *			option *
			Mgmt	Comments	GEF EO	Comments
						the GEF system then implements the proposal. It will also require the GEF Sec to establish a monitoring system to report back on time.

Management Action Record – April 2007 Evaluation of the GEF Support to Biosafety (GEF/ME/C.28/Inf.1, May 2006) Management Response (GEF/ME/C.30/8, Nov 2006)

Recommendation	Management Response	Council Decision ²		Rating in Prog	ress of Ad	option *
			Mgmt	Comments	GEF EO	Comments
Future assistance should be better planned and customized to each participating county.	We agree with this recommendation. A stock taking- assessment of the biosafety capacity in participating countries, as a first step in project design, has been proposed. The analysis will include an independent identification and analysis of the necessary aspects to tailor the support to identified needs at country level and at regional and sub-regional level resulting in targets that are measurable and clearly defined. Regional approaches will have flexibility in terms of issues addressed to target specific needs of countries within a region. In addition, we recognize that a thematic approach can be the best way to support a group of countries lacking competence in a particular field. The proposed strategy will promote issue-specific projects based on a previous assessment of needs in countries.	Dec. 2006 – Decision on Agenda Item 15 - The Council reviewed the proposed Strategy for Financing Biosafety (GEF/C.30/8/Rev.1) and approves it as an interim basis for the development of projects for implementation of the Cartagena Protocol on Biosafety until such time as the focal area strategies are approved by the Council. The Council invites the Implementing and Executing Agencies, under the coordination of the GEF Secretariat and based on their comparative advantages, to collaborate with the GEF to provide assistance to countries for the implementation of the protocol.	High	A stock taking- assessment of the biosafety capacity in participating countries, as a first step in project design, has been approved in the Strategy and will be developed in all project proposals	Medium	The interim <i>Strategy for</i> <i>Financing Biosafety</i> has incorporated this recommendation, but Council has not yet approved the <i>Focal Area</i> <i>Strategy</i> for <i>Biodiversity</i> .
The GEF should consider providing longer term training for building and sustaining specialist capacity in risk assessment and risk	We agree with this recommendation. Under the proposed Strategy, project activities will implement the Updated Action Plan for Building	See above	High	Under the approved Strategy for Financing Biosafety, long-term training in risk assessment and risk	Medium	See above

² This Council Decision refers to *Strategy for Financing Biosafety* (GEF/C.30/8/Rev.1) and not to the GEF EO Evaluation which was an information document.

Recommendation	Management Response	Council Decision ²	Rating in Progress of Adoption *			
			Mgmt	Comments	GEF EO	Comments
management.	Capacities for the Effective Implementation of the CPB, where RA and RM capacity building have been prioritized. Project sustainability, reflected in the sustainability indicators included in the proposed Strategy, will favor the continuation of activities in countries after the end of GEF support.			management will be incorporated into project design when stock taking assessments indicate there is a need.		
The GEF should continue to emphasize awareness-raising and public participation issues, including support to the Biosafety Clearing-House.	This recommendation has been taken into account in the proposed Strategy and activities such as awareness raising, education on biosafety, access to information and public participation on decision making will be fully incorporated in project design. Activities to improve countries participation in the BCH, identified in the stock-taking analysis, will form part of project design.	See above	High	Under the approved Strategy awareness raising and public participation issues will be fully incorporated in project design. Further efforts will be made to support the full participation of eligible countries in the BCH.	Medium	See above
The GEF should work toward a higher degree of donor collaboration and other cost- sharing schemes at the global and national levels.	We agree with this recommendation. Coordination of efforts at the international level will be enhanced through the exchange of information, collaboration, and work through the Coordination Mechanism for the Implementation of the Action Plan for Building Capacities for the Effective Implementation of the CPB. Complementarity of activities, with other existing biosafety capacity building initiatives, at bilateral and multilateral level, will be stressed. At national level, the definition of the role of a national coordination mechanism, that includes the promotion of synchronized and synergistic implementation of	See above	High	In addition to work at international level through the Coordination Mechanism and the enhancement of the coordination at national level, coordination of biosafety capacity building efforts supported by the GEF will be enhanced through the establishment of a steering committee to ensure that biosafety projects are executed in alignment with the GEF Strategy.	Medium	See above

Recommendation	Management Response	Council Decision ²	Rating in Progress of Adoption *			
			Mgmt	Comments	GEF EO	Comments
	capacity building activities and the harmonized use of donor's assistance will be included in project design.					
The GEF should seek advice from its Scientific and Technical Advisory Panel and other scientists as to whether and how biosafety could be better integrated strategically and programmatically into the GEF biodiversity portfolio.	This recommendation has been taken into account and the GEF Secretariat, in consultation with STAP, will explore how national capacities under RA and RM existing systems, such as those for customs and trade, can be extended to support RA and RM for LMO's.	See above	High	The biodiversity technical advisory group (where STAP is represented) advised on refining the biodiversity strategy to include biosafety under one strategic objective entitled "Safeguarding Biodiversity". Through this strategic objective, GEF will help build country capacity to implement the Cartagena Protocol on Biosafety as was agreed at December 2006 Council meeting. In addition to this support, GEF will support the implementation cost- effective strategies to prevent, control and manage invasive alien species.	Medium	The Focal Area Strategy for Biodiversity has included biosafety under one strategic objective entitled "Safeguarding Biodiversity," but Council has not yet approved the strategy.