

Third Meeting for the Sixth Replenishment of the GEF Trust Fund
December 10-12, 2013
Paris, France

COMMENTS OF THE SENIOR INDEPENDENT EVALUATION ADVISORS

ABSTRACT

OPS5 has pulled together an impressive portfolio of Evaluation Office and partner evaluations, meta-evaluations and studies to address all the objectives and questions set out in its Terms of Reference (TOR)¹. Not surprisingly, not all questions were fully answered, given their global scope, the complexity of GEF's partnership network and a business model for GEF that OPS5 found inadequate. OPS5 was highly relevant to the replenishment, with its two reports timed to support the first and last meetings of the GEF Council's replenishment exercise.

While OPS4 analysis of GEF governance concentrated on its high-level architecture, OPS5 addressed GEF's strategic management framework and operational effectiveness. Echoing previous findings, it found that a core element of the GEF business model – the results-based management system – is broken. A key limitation is that it is not calibrated to support adaptive management at the governance, strategic management and operational levels. Nor is it aligned with focal area strategy results frameworks. OPS5 provided the evidence to support three key recommendations to repair and update the business model. More comparison of GEF performance to that of other institutions would have strengthened and informed the comprehensive analysis of governance.

Questions on funding were covered substantively, but given GEF's role in other environmental Conventions, the implications of a disproportionate share of funding flowing to climate change in recent years deserved greater attention, as did substantial donor arrears. Evaluative evidence supported the conclusion that the GEF has had a multiplier effect through stakeholders on the ground. OPS5 concluded, correctly, that if GEF is to continue to play its catalytic role, it should focus on mobilizing more funds for GEF 6. Concerns about the health of the GEF network, as it strains under a relentless pace of change, were convincing. Strengths and weaknesses of current focal area strategies were evaluated with persuasive evidence, but further analysis of emerging multi-focal area projects and their impacts is needed to help determine future strategic directions and design. As well as limitations in methodology, a lack of rigor in defining alignment as linking investment metrics with national priority metrics puts in question the findings on increased country ownership. Countries will own environmental strategies and programs only when they choose the priorities and use metrics to align all investment with national priorities.

Special note must be made of conclusions on GEF's gender policy, given the established reciprocal links between outcomes for girls and women and outcomes for the environment. More work, such as that represented by the OPS5 recommendations on gender, must be done to embed gender intelligence into GEF (and into evaluations of its effectiveness in this area) as successfully as leading organizations have done.

¹ See Terms of Reference and Budget for the Fifth Overall Performance Study of the GEF: GEF/ ME/C.42/05 May 9, 2012

As stated above, OPS5 has brought together many streams of solid evidence in answering the questions posed in its Terms of Reference. Those questions tended to focus on GEF's relevance in terms of country priorities and the Conventions for which it is the financing mechanism, and OPS5 duly answered those. Its Terms of Reference, unfortunately, did not raise the larger question of assessing GEF's global relevance, nor how this might be enhanced. As environmental degradation accelerates, subsidies that support environmentally-damaging activities remain in the trillions of dollars, and global environmental funding needs increase, we believe this is an increasingly pressing question.

COMPLIANCE WITH OPS5 TERMS OF REFERENCE

Our tasks as Senior Independent Evaluation Advisors (SIEA) were to (i) provide an independent opinion of the quality of OPS5 two key products, the first and final reports² to the replenishment process; and (ii) attest to the compliance of OPS5 with its Terms of Reference (TOR). This note assesses the OPS5 Final Report and complements the comments we offered on the First Report (GEF/R.6/04/Rev.01 March 22, 2013) and at various stages in the sub-study terms of reference and drafts.

Our comments must be seen in the larger picture of evaluation practice. GEF Evaluation Office Overall Performance Studies stand among best practice in global institutional governance. The Evaluation Office is among the pioneers in developing a theory of change at the institutional level. Few international development organizations produce such comprehensive assessments at regular intervals.

From the perspective of quality assurance, assessing whether OPS5 sufficiently met its TOR entails answering two questions: (i) has the report adequately addressed the key questions in OPS5 TOR; (ii) does the OPS5 meet TOR requirements, including delivering the evaluation documents on time, employing sufficient scope, and targeting the intended users (that is, the replenishment group and council)?

The TOR asked OPS5 to answer 11 of its key questions in the First Report and the remaining 11 in the Final Report. The OPS5 Final Report questions deal with several issues, including relevance of GEF, funding, focal and multi focal areas, country ownership, governance and stakeholders on the ground, as well as gender policy. For ease of reference, the following table indicates where we have addressed the quality and completeness of the evaluation of each question:

² The First Report drew from a meta-evaluation of the Evaluation Office products since OPS4 and the Final Report drew from 14 sub-studies, a joint study with UNDP on Small Grants Programme, other GEF studies and the comments of the Senior Independent Evaluation Advisors.

Table 1: SIEA Comments Relative to TOR Questions

Key Issues in SIEA Comments	TOR Questions for Final Report
Relevance Of GEF	Question 1
Funding: Sufficiency and Use	Question 2, Question 3
Focal and Multi Focal Area	Question 4
Country Ownership and Alignment	Question 5
Governance-Related Issues	Question 6, Question 7, Question 11
Stakeholders on the Ground	Question 8, Question 10
Gender Policy	Question 9

Overall, we found that OPS5 addressed the majority of the TOR questions by offering evaluative evidence. Perhaps not surprisingly, some issues related to the key questions are not fully addressed. Examples include country ownership (including the proper role of alignment), gender policy, and further analysis of the impacts of multi focal area strategies, the positive and negative effects of the Small Grant Programme expansion, and stresses on the GEF network. An additional weakness in OPS5 coverage of the TOR lies in a lack of systematic comparison with other multilateral organizations in some of the key questions. This is why the TOR question asking to what extent the GEF is in line with international best practice, for example, is not fully addressed.

As an important improvement over the previous OPSs, the OPS5 is timed to support the GEF replenishment cycle. The First OPS5 Report was available at an early stage in the replenishment process when related policy and programming documents were in preparation. At the request of the first replenishment meeting, the Progress Report of OPS5, highlighting five replenishment issues, was presented to the second replenishment meeting. The Final Report of OPS5 is to be delivered for the third meeting, near the end of the process. The synchronization of OPS5 with the replenishment process enhances the likelihood that decision-makers will take into account its conclusions and recommendations at the appropriate points.

To communicate its key messages effectively, the OPS5 Final Report provides three overarching conclusions and recommendations. Generally they are on the right track, focused on key effectiveness concerns for the replenishment negotiations, and facilitate discussions on the strategic direction of GEF-6.

OPS5 has met TOR requirements in terms of timeliness and focal area coverage. We also recognize that the Final Report provides a road map of key questions indicating the discrepancies between the original key questions in the TOR and actual treatment in the Final Report³.

RELEVANCE OF GEF

Several TOR questions touch explicitly or implicitly on the relevance of the GEF, which we note is generally defined in the OPS exercises as relevance to regional/country priorities and to the Conventions.

Conclusion 7 of the OPS5 First Report noted that “GEF support at the country level is well aligned with national priorities, shows progress toward impact at the local level, and enables countries to meet their obligations to the Conventions.” Moreover, the Final Report concluded that “the overall level of GEF responsiveness to Convention guidance is high at both the strategic and portfolio levels.”

The methodological note on Triangulation Analysis in Country Portfolio evaluations stated, however, that country-level evaluation analysis conducted by the Office faced a number of limitations, including data scarcity, especially in the least developed countries; failure to clearly set out expected project impacts or even outcomes, especially in older projects; and intrinsic difficulties in defining the GEF portfolio of projects. These limitations raise doubts regarding relevance and its measurement at the country level.

Moreover, and more pressing in terms of relevance, OPS5 referred to global needs for action on the environment of around \$100 billion annually – against a backdrop of governments around the world providing more than \$1 trillion annually to support unsustainable environmental subsidies, for example for fossil fuels.

As OPS5 correctly noted, “For the GEF to be effective in tackling the challenges posed by today’s global environmental threats, it must operate in partnership and demand action from all the entities making up the GEF global network.” We agree, noting that this call to action lies outside the strict OPS5 TOR, which focused on a more limited view of relevance. We would strongly support deeper exploration of GEF’s effectiveness in this role in the Terms of Reference for future OPS exercises.

FUNDING: SUFFICIENCY AND USE

OPS5 was asked to address a cluster of questions on funding and resource mobilization: Does the GEF have sufficient funding to address the focal area strategies, guidance of the Conventions and the needs of recipient countries in a meaningful way? To what extent is the GEF able to mobilize sufficient resources? To what extent do the donors perform as pledged? Given the emergence of new financing channels, what is the added value and catalytic role of the GEF as a funding channel?

³ Annex B of Final Report – Key Issues of OPS5 and Where They can be Found

OPS5 did an extensive and informative evaluation of funding channels, resources and donor performance, despite the challenges of achieving coherence in definitions and bringing together information on environmental ODA. The evaluation included a Technical Paper, "Sub Study on Funding Channels, Resources and Donor Performance," which undertook a rigorous analysis on the funding behavior for environmental activities as a whole and how GEF has performed in regard to mobilizing funds.

While OPS5 found that ODA has been declining overall since 2010 as a result of the financial crisis, funding for global environment goals increased significantly as a share of ODA, going from 5% of total ODA in 2006 to 14% in 2010 and remaining fairly steady since then. A concern, however, is that climate change mitigation is taking the greatest share of the increase. Most governments, NGOs and other organizations dealing with environmental goals have this as their main or only focus, implying that GEF must take major responsibility or at least compensate for other focal area strategies.

Yet OPS5 made it clear that funding for priorities over all – including climate change – is not sufficient. In discussing the marked increase in funding by OECD-DAC donors for the environment in recent years, it noted that GEF funding has not benefitted proportionately. This leaves the concern that the other areas for which GEF is responsible may be seriously underfunded. Although recommending that "the replenishment should be based on the urgency of the global environmental problems," OPS5 did not deal explicitly with this possible funding imbalance.

The OPS5 data suggested that since the economic crisis, developed countries' ODA for environment goals may not be sustainable, and emphasized that trends in LDC, NGO and private sector funding will not offset this drop. It noted that, at a time when the GEF has accepted more obligations, the replenishment may show no increase in purchasing power. Its recommendations provided some guidance to GEF, although scale of the need might have called for something more sweeping: it suggested that GEF should base itself on the UN scale of contributions, should further explore broadening its financing basis and should invite the European Commission to become a donor.

Donor performance is a further concern. Donors have not been meeting their obligations on time, resulting in arrears: as of May 2013, US \$587 million was outstanding, representing 16.5% of the amount pledged for GEF-5. OPS5 did not identify any measures (or members) to discourage arrears.

On a more positive note, OPS5 concluded that although GEF plays a relatively small role as a funder against global needs, it certainly acts as a catalyst. Apart from its own US \$1 billion commitment, GEF through its "intervention model" has been able to mobilize and raise a further US \$3 billion through co-financing. Recipient countries spend about 50% in co-financing of GEF-supported projects. Using counterfactual analysis, OPS5 identified three ways in which GEF is catalytic: without GEF, this co-financing would not have materialized; it would not have happened as quickly; and it led to better action.

The OPS5 "progress to impact study" confirmed further that projects that had both successful broader adoption and environmental impact had a significantly higher

average grant amount than those that had less successful broader adoption and no environmental impact, with a difference of about US \$3 million between the two groups. GEF as a funding channel is therefore important as a catalytic player to create broader adoption and environmental impact.

The evidence presented in OPS5 made it clear that greater resource mobilization and faster availability of funds will lead to more concrete, visible results on the ground. Triangulated evidence from reports contributing to OPS5 showed that wherever there has been a substantial level of funding support by GEF to recipient countries and programs, the rate of outcomes and success has been higher. We agree with the conclusion of OPS5, reflected in its first recommendation, that if GEF is to continue to play its catalytic role, its priority should be mobilizing more funds for GEF-6.

FOCAL AND MULTI-FOCAL AREAS

The TOR required OPS5 to examine the strengths and weaknesses of GEF focal area strategies and also to look at the role and added value of cross-cutting support through multiple focal area interventions.

OPS5 addressed focal area strategies' strengths and weaknesses with convincing evidence, supported by evaluation of the GEF Thematic Evaluation of Focal Area Strategies and impact evaluations such as those on climate change mitigation and biodiversity.

GEF evaluation streams demonstrated that GEF activities were highly relevant to Convention guidance. Focal area strategy mapping showed that Convention guidance has largely been followed. Convention secretariats and the corresponding GEF secretariat teams strongly supported this assessment. OPS5 highlighted, however, that weakness in the management of strategies stems from the multifarious nature of Convention guidance: it is cumulative, unrefreshed and operationally complex and lacks prioritization.

OPS5 provided evidence pointing to the emergence of multi-focal area projects that address global environmental concerns relevant to more than one GEF focal area. OPS5 pointed out that multi-focal area projects are rapidly gaining importance for the GEF portfolio and could be the future modality for the GEF. They have the potential to address connected focal area issues through synchronized and properly sequenced interventions on interdependent systems that create positive environmental impacts. OPS5 stated that the 54 multi-focal area projects completed to date are likely to report a variety of environmental impacts. We believe that further analysis is needed, however, to compare outcomes and impacts of multi-focal projects to those of single focal area projects. Until that is done, it is premature to draw conclusions about the added value of GEF providing cross-cutting support through multi-focal area projects.

Depending on the outcome of that analysis, the GEF-5 Focal Area Strategies, formulated before the development of multi-focal area projects, may need to explore other global initiatives that have moved to a new generation of programming. This new generation

of programs is delivered by multi-sector and multi-agency partnerships focused on common impacts. They use common measures across the partnerships, often supported by new agencies or a lead government department. The need for more collective impact programming and lessons learned from others may pose challenges for the formulation of strategies for GEF-6 and relations among Convention secretariats.

COUNTRY OWNERSHIP AND ALIGNMENT

The TOR asked for an evaluation of the extent to which the major reform processes of the GEF achieved their objectives, following the key principles of enhanced country ownership and improved effectiveness and efficiency.

The Final Report outlined a narrative of increasing effectiveness and efficiency resulting from such major reforms as the System of Transparent Allocation of Resources (STAR) adopted in November 2009, which it also identified as having increased country ownership.

OPS5 underlined that country ownership is critical to development effectiveness. GEF is striving to increase country ownership by moving from donor-driven decision-making to empowering governments and other country stakeholders such as civil society and the private sector to drive environmental policy and programming. A meta-evaluation of country ownership in OPS5 aimed to ensure that the Paris Declaration phase 2 was applied in the evaluation process, including the use of indicators from the declaration. Key indicators were built for ownership, alignment, harmonization, managing for results and mutual accountability.

While OPS5 shows positive results with relation to ownership, we note some limitations listed in the meta-evaluation itself relating to other indicators: “Firstly, many of the discussions of ownership in country level evaluations were limited to assessing stakeholder involvement in the design and implementation of projects. There was a paucity of data on harmonization; mutual accountability; managing for results; use of country systems for project implementation / procurement and contracting, and on the prevalence of parallel structures (e.g., PIUs and / or PMUs); private sector and to some extent civil society involvement beyond the SGP” (meta-evaluation, p. 15).

The country level evaluations also indicate that “achieving effective coordination to support GEF activities has been mixed in practice, with 12 countries having more than moderate performance while 10 countries have weak performances. The reason for the mixed results and weaknesses in effectiveness is mainly due to poor coordination and lack of capacity in the local focal points amongst other reasons. Therefore there are questions regarding ‘effectiveness’ and ‘efficiency’.”

We have included a discussion of alignment in this section because it is central to ownership. Country ownership emerges when the country initiates an outcomes-focused, multi-sector strategy with evidence-based plans. Public scorecards help the public and private sectors to organize their contributions around priorities, diagnosis what is working and what isn’t and identify successful interventions. It is only through

rigorous measures, that development interventions demonstrate alignment, a performance relationship, to country level outcomes. For example, natural resource management, water authorities, and agri-business would report on percentage reduction in annual water usage to meet a country-driven environmental priority of 20% reduction in each decade.⁴

There is a concern, however, that GEF, like other development organizations, has used the term “alignment” much more loosely in development planning, results frameworks and evaluation. An imprecise connotation does not drive the proper coordination, substantive learning and sequencing of activities to achieve high-level country strategies. This is especially problematic when there is a need to align interventions by multiple projects and partners. Beyond the definition issue, we are also concerned that the alignment model implicit in GEF’s thinking works in the wrong direction for country ownership, building as it does from project-by-project measurement instead of from overarching national and regional strategies and priorities back to projects.

GOVERNANCE-RELATED ISSUES

The Terms of Reference required OPS5 to look at the extent to which the governance of the GEF is in line with international best practices.

OPS4 provided an in-depth review of GEF governance, which it defined for the purpose of the study as the “the exercise of political authority by member nations” and further elaborated as steering or directing an organization, fixing clear strategic directions, setting priorities, providing clear guidance and allocating resources commensurate to the agreed mandates, and establishing appropriate monitoring and evaluation functions.

OPS5 addressed governance in two ways. First, it returned to the recommendations of its predecessor, pointing to the lack of follow-up on one OPS4 recommendation for clear guidance on constituency formation and operation. Second, OPS5 moved from evaluating GEF’s architecture and continued transparency to an analysis running implicitly throughout the report of the strategic management capacity of the GEF council and secretariat.

As well as identifying a lack of clear strategic directions and priority setting, this analysis noted the shortcomings of GEF’s results based management system. It is overburdening the system instead of giving leadership a straight sight line from strategic objectives to results on the ground. While creating some accountability for individual project results,

⁴ See for example “A New Vision for Agriculture: A Road Map for Stakeholders” <http://www.weforum.org/reports/realizing-new-vision-agriculture-roadmap-stakeholders>

and The Global Transportation; see also the World Bank Global Transportation Facility publication with WHO at: http://www.ki.se/csp/pdf/Publications/WBGRSF_guidelines.pdf

it lacks a cogent set of core indicators that would support adaptive management and ensure more synthetic results programming across GEF-funded interventions at the country, regional and global levels. With no common currency of technical and scientific measures, there is no measureable alignment with GEF and country strategic objectives.

To support OPS5 conclusions on the need for results management reform, GEF needs to revert to the original purpose of results-based management and measurement. In cases of best practice, governments and global organizations use evidence to manage continuous institutional change, and to select and organize partnerships to deliver interventions that best achieve desired outcomes. As knowledge accumulates, higher levels of ambition shape interventions instead of the other way around. To achieve substantive outcomes, results management and measurement systems need to serve leader and operational management specific needs as defined by what they need to do their jobs – the closer to implementation, the more detailed. The results systems must provide outcome-based evidence for adaptive, real time decision-making and for testing substantive theories of change. It is thus the role of leadership, not evaluation or quality control departments, to develop frameworks that they own and use.

A results based management system for GEF should be based on scientific measures emanating from the wide portfolio of the GEF-funded interventions. The portfolio as a whole should, for example, be able to answer such questions as: How has the rate of GHG emissions slowed? How many tons of CO₂ have been avoided thanks to the Climate Change Adaptation focal area's share of GEF's \$11.5 billion investment? A common currency of high-level lag and lead measures of environmental impact embedded in GEF-funded interventions need to align – not semantically, but measurably – with the focal area strategy metrics. The issue goes beyond internal management. If GEF were better able to show the impact of its portfolio on the status of the environment in scientific terms and in social costs avoided for the \$11.5 billion invested since its launch, GEF would be better able to attract funds – perhaps not new funds, given economic conditions, but it could better position itself for redirection of funds from other existing and often fragmenting funding mechanisms.

In light of all this, OPS5 has made sensible recommendations for the reform of the GEF business model.

There was scant comparison of GEF performance to other institution at the level of governance. While we recognize barriers to such comparisons, other international organizations have developed approaches that could usefully inform like-to-like comparison of governance of GEF to other specialized agencies and global funding mechanisms.

Among comparisons that were included, the 80% outcome rating across projects is not meaningful, as noted by OPS4 the independent evaluators' report, without the additional measures used by other institutions, such as the Bank, to measure sustainability, government and Bank performance. Further, a separate rating of each

product an organization funds is not a strong indicator of global effectiveness when individual projects are not linked to higher-scale strategy and performance frameworks. Indeed, OPS5 recognized the one-off nature of GEF activities in its call for a stronger focus on programming, not just projects, and parallel improvements to the results framework.

2. The comparison of GEF full governance over its trust funds versus the Bank and UN approaches is not a reason to praise the GEF governance. For example, the Bank, which supports trust funds with commitments in the tens of billions of dollars and involves the Board when necessary, manages the financial flows for the GEF without a governance role. This makes sense as GEF does not need two elaborate oversight mechanisms. For other funds, the Bank does have a governance role when it makes sense to do so, as with the CGIAR. There may be additional issues around UN management of trust funds

We have considered GEF's relationships with its network as an element of governance. The GEF has been assessed as a network organization since OPS3. OPS3 through OPS5 all noted considerable strengths in the GEF network. The fast pace of change within the GEF, however, has caused increasing complication and overload and, now, the danger of disruption. As OPS3 pointed out, the GEF is reaching the limits of what can be done in a network organization. OPS4 echoed this concern and emphasized the tensions between the GEF agencies and the GEF secretariat, and between the agencies and recipient countries.

The OPS5 evaluative evidence on the health of the GEF network was based on surveys, interviews, historical records and evidence of other evaluations, as well as innovative social network analysis. Its findings were consistent with those of previous OPS reports. OPS5, however, pointed to a more urgent need to reexamine the current GEF network arrangements and offered more concrete recommendations. It proposed, for example, that GEF-6 replenishment meetings address how partners be included and direct the development of a new partnership vision during GEF-6. We thus found OPS5 fully addressed the issue of the health of the GEF network, although it did not examine the extent to which GEF network and partnerships are enhancing or diluting achievements.

Finally, we have included here our assessment of how well OPS5 evaluated the role of STAP. The STAP sub study revealed how potent the effects of underperforming administrative systems are on the effectiveness of professionals. Scaling up the role of the STAP from projects to programs makes good sense, as does the expansion of STAP's role to provide social science guidance. One caution is that while senior scientific advisory panels have played a crucial role in bringing the best of science to development, asking them to be evaluators as well as advisers can create its own headwinds.

STAKEHOLDERS ON THE GROUND:

Small grants, the private sector and civil society

The TOR raised several questions relating to stakeholders: To what extent is the GEF able to mobilize stakeholders on the ground? What are the trends in involvement of the

private sector and of civil society organizations? And a closely related issue, to what extent is the GEF Small Grants Programme successful in broadening its scope to more countries while continuing to ensure success on the ground?

Taken together, the sub studies on the small grants program, civil society and private section engagement have answered the TOR questions with evaluative evidence to conclude that the GEF has had a multiplier effect through stakeholders on the ground.

The OPS4 independent evaluators' report recommended more joint evaluation by GEF. To that end, the small grants sub study, a joint evaluation undertaken with the UNDP, offered timely input to the replenishment. Its evaluative evidence showed that the program has successfully broadened its scope since 2007 from 74 to 117 countries, of which a high proportion are small island developing states, LDCs and fragile states. The joint report did not cover the positive and negative effects of these changes. It provided an update to the previous joint evaluation in a somewhat descriptive manner. More in-depth analysis on some issues, such as relevance of the small grants program to GEF strategic and country objectives and the comparative advantage of the GEF managing these funds, needs to be further addressed in the second phase.

The private sector study stood out as useful analysis of the broader trends outside of GEF involvement. For example, leading corporations are beginning to adopt sustainability as a driver in corporate strategies and the impact investment holds significant potential to contribute to GEF's overall goals. Both of these "glimmers of light" suggest new opportunities for the GEF. The study suggested a broader role for GEF than appears in OPS5 in supporting informal processes for trust-building and conflict resolution. GEF could use its convening power to work with civil society organizations and the private sector to address inefficiencies in global systems, for example the proliferation of sustainability indices. Given the potency of private sector engagement in GEF projects (52% of projects contributed to market changes), OPS5 could have considered a more systemic role for GEF in its recommendations.

The civil society engagement study addressed the role of civil society and confirmed its comparative advantage for grassroots change. As with most of the sub-studies, it scrubbed the PMIS as its prime, but not only, source of data and in this case has answered the TOR question sufficiently. Yet, despite agreeing that civil society engagement is important, we found ourselves wondering whether engaging with the broad list of GEF partners actually achieved the maximum value it might have. This concern arises from the lack of an effective business model that OPS5 also noted. Without an effective model, it is impossible to determine whether these were the most appropriate partners to make the greatest impact, whether projects contributed to focal area strategic objectives, or whether countries used the lessons of the projects to inform improvements in institutional policy, structure, policy and procedures.

GENDER POLICY

The TOR asked OPS5 to consider the extent to which cross-cutting policies such as knowledge management or gender are adding value to GEF support. OPS5 presented a

good case that knowledge management has not been resourced and thus its value to the GEF remains to be added. We decided, therefore, to focus on the gender because GEF is a late adopter of gender strategies in the international system.

GEF indeed has the potential to add value through programming to enhance women's and girls' contribution to the environment. GEF also has an obligation to add value to the lives and livelihoods of women and girls by understanding how environmental changes and new green technologies affect their health, social and economic status.

OPS5 began its analysis by stating that gender is "one of the main avenues to achieve behavior change that will lead to broader adoption of sustainable solutions to global environmental problems." Although OPS5 does not say explicitly, its evaluation indicates that GEF underperformed dramatically. The gender sub-study was restricted to a desk study of project documents since the approval in 2011 of GEF's Gender Mainstreaming Policy. It found that only 20% of closed GEF-4 project documents (55 of 281) indicated that gender mainstreaming had been featured from design through to implementation. Since 2011, GEF-5 project approval documentation showed marginal gains over GEF-4 in attention to gender.

The study would have been more useful had the evidence included field-testing of closed and operational projects with and without a track record of gender interventions. This would have provided a better check on whether GEF is on track to converge with current global best practice on gender and environment⁵, as well as pointing to lessons from GEF's omissions and its nascent gender work.

More troubling, however, was implicit support by OPS5 for the concept that some groups of projects are *a priori* exempt from gender analysis. The Final Report, for example, noted an increase in the share of projects that aim to mainstream gender since the adoption of the GEF Gender Mainstreaming Policy in May 2011. The evaluation team concluded that it considered as "gender relevant" some 22% of the approved projects that GEF had rated as "gender not relevant." OPS5 stated that "omitting attention for gender where it is needed *may have* led to unintended negative gender-related consequences" (emphasis added). We disagree. Close to forty years of experience since the UN Decade for Women has shown that omitting attention to gender *almost always* leads to unintended adverse consequences. While the subject or scope of a project may appear to be gender-neutral, its planning and implementation are nonetheless likely to have differential effects on the sexes, whether it be choice of street lighting or choice of crop to be studied. At the very least, every project generates employment to which women qualified for the jobs ought to have unfettered access. Accepting that a project proposal can claim exemption without proof that there are no

⁵ See, for example, the award-winning work of the International Union for Conservation of Nature (www.iucn.org) on gender and the environment. See also its new website: environmentgenderindex.org

gender effects is a weakness in the analysis that should not be repeated in future GEF programming or evaluation.

For OPS-6 we recommend that GEF's Evaluation Office include gender analysis in all of GEF-6 products and the OPS6 sub studies. Gender is a matter of development effectiveness and should not be left to personal persuasion. OPS6 needs explore issues of accountability, particularly of the Secretariat in advancing GEF's value added on gender and the environment.

We agree with the five recommendations on gender. However, the gender expert recommended must be mandated to support GEF leadership in providing the appropriate institutional incentives and capacity for gender. Too often gender experts, like results experts, are asked to do the gender work of an organization. Instead, he or she needs to work on institutional support to ensure gender expertise is development expertise that needs to be understood by senior management and staff alike and incorporated into their daily professional, and technical and scientific accountabilities.

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