

CONSERVATION AND SUSTAINABLE USE OF LIBERIA’S COASTAL NATURAL CAPITAL

GEF Project ID: 9573

CONSERVATION INTERNATIONAL'S RESPONSES TO THE MID-TERM EVALUATION RECOMMENDATIONS

OCTOBER 2023

MTR RECOMMENDATIONS	CORRECTIVE / AUGMENTATIVE	RESPONSIBILITY AND TIMELINE	CONSERVATION INTERNATIONAL'S RESPONSES
<p>Undertake a comprehensive, participatory, and strategic review of the project design and Project Logical Framework. This includes:</p> <ul style="list-style-type: none"> reducing the overall scope of work to core deliverables based on an assessment on what is realistic in the time remaining given project and government constraints. review the financial needs assessment (the financial resources for the sustainable management and restoration of coastal ecosystems) prioritizing interventions that are likely to have the greatest sustainable impact by the end of the project as per outcomes of the reconstructed Theory of Change. paring down and ensuring indicators are uniquely impact-oriented. ensuring all indicators are SMART. apply a holistic, integrated, and participatory strategy to the planning and management of the project's 3 Outcomes, with careful attention to dependencies, to strengthen the present 'scattergun' approach; ensuring that project progress and impacts can be measured systematically and rolls up to the objective level; 	<p>Corrective</p>	<p>PMU, CI-Liberia, CI-GEF and PSC (Immediately following MTE)</p>	<ul style="list-style-type: none"> On the scope, this recommendation is accepted. Based on the logistical constraints and challenges of operating in Sinoe, Grand Kru Counties, the project scope should now cover Grand Cape Mount, Grand Bassa, Margibi and Rivercess Counties that are accessible throughout the year. The Consultant seems to insinuate that the current results framework is not logical despite it showing the progression/connection between the activities, outputs, outcomes and objective. The Consultant should endeavour to appreciate the GEF results framework template It would be prudent for the consultant to provide more information or evidence of "scattergun approach"

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<ul style="list-style-type: none"> taking a Theory of Change approach to the prioritization of investments. systematically recording all significant changes to the original project design described in the Project Document and seeking approval from the Project Steering Committee. 			
<p>To meet its potential, the Project needs to accelerate delivery within the next year. Failure to achieve core deliverables will likely lead to sub-optimal results in the achievement of the core objective. As such, the Project should be on a milestone-based performance plan. Any extension request should be weighed against the achievement of clear yearly milestones. Indicative milestones are as follows:</p> <p>2024 (Calendar year):</p> <ul style="list-style-type: none"> Finalization of the NCA Liberia National Strategy and Action Plan, which includes endorsement and sign-off by the TAC and NSC. Recruitment of a dedicated Project Manager and M&E Officer. Finalization of NCA Liberia Training Modules. Renewal of Community Conservation Agreements based on lessons learned. Update roadmap of policies, strategies, and development plans targeted with key milestones and how to get there. The road map shall identify at least 3 policies/strategies to be prepared with an effective mainstreaming of NCA into their objectives and concrete actions. <p>2024 (Calendar year):</p> <ul style="list-style-type: none"> Finalization of Mangrove Accounts. Pilot multiple sustainable financing mechanisms. Engagement of at least 1 private sector partner in coastal conservation. Delivery of training programme. 	Corrective	CI-GEF (Immediately following MTE)	Agreed

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<ul style="list-style-type: none"> Implement financial mechanisms with the most promise to deliver sustainable benefits. Increase Community Conservation Agreements. <p>2025 (Calendar year):</p> <ul style="list-style-type: none"> Target policies and development plans for the incorporation of NCA, including also actions on gender mainstreaming. Transition strategy 			
<p>Approve a no-cost extension on the basis of the successful realization of milestone targets and if not, wind down the project gracefully.</p>	Corrective	CI-GEF, Project Steering Committee (Initiate process mid-2024 following PIR, based on achievement of and progress towards milestones)	Agreed
<p>PMU is ill-equipped to fully meet and address the monitoring requirements of the project and should engage an M&E Officer. Once onboard, a review of the Monitoring Plan should be conducted.</p>	Corrective	CI-Liberia, CI-GEF (Immediately following MTE)	A dedicated M&E Manager is in place
<p>Gender and social inclusion measures should be reviewed and updated as necessary as part of the role of a newly assigned or recruited M&E Officer. Indicators should be checked and opportunities to disaggregate data maximized for gender, youth, elderly, indigenous, etc.</p> <p>Going forward technical documents prepared by the project, such as feasibility study and analysis, should consider more the gender mainstreaming, by introducing specific actions to provide more concrete opportunities to women and other disadvantaged groups for sustainable (eco-friendly) economic activities, conservation activities and to support the development of women leadership in management and sustainable valorization of natural capital in the coastal zones.</p>	Corrective	CI-Liberia, PMU (Once recruitment of M&E Officer is complete and individual is onboarded)	This is noted. However, gender and social safeguards data and information has been collected and updated regularly as indicated in the progress reports and other studies or assessments that were conducted
<p>Revisit environmental and social safeguard risks and include training to communities on grievance mechanisms and Free</p>	Corrective	CI-Liberia, PMU (Immediately following MTE)	Noted. However, training on FPIC and GRM was provided in almost every local

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<p>Prior and Informed Consent (FPIC). Training should not be one-off, but an ongoing activity to ensure communities internalize concepts and recourse. As a part of the ongoing process to mainstream safeguards in project operations, the PMU should make efforts to foster broader inclusion within the communities and organizations supported by the project.</p>			<p>community engagements that were held</p>
<p>The current management structure of the project needs to be re-aligned to empower the PMU and enable the Project Manager (PM) to be fully accountable for delivery. This includes oversight of the budget, including the travel budget.</p>	<p>Corrective</p>	<p>CI-GEF, Project Steering Committee (Immediately following MTE)</p>	<p>The Project Manager is responsible for the day-to-day management of the budget but the oversight of the budget squarely lies with the Finance/Operations Director. However, efficiency of the operational procedures is what should be enhanced</p>
<p>More travel to the field and a key is to rebuild trust and relationships with communities, per the stakeholder engagement model and ambition in the Project Document.</p>	<p>Corrective</p>	<p>CI-Liberia, PMU (Next Annual Work Planning cycle)</p>	<p>Agreed</p>
<p>Ensure that community conservation agreements are renewed and not left to expire. Ensure to demonstrate early value so communities see the benefits of extending these agreements.</p>	<p>Corrective</p>	<p>PMU (Immediately following MTE)</p>	<p>Agreed.</p>
<p>Strengthen reporting, particularly the traceability between Quarterly Reports and PIRs. It is recommended that something akin to a 'traffic lights' dashboard system is adopted for reporting quarterly at output level (not activity level which is likely to be too time-consuming), using self-assessed quantitative estimates of progress towards completion, supported by qualitative evidence (photos, etc.).</p>	<p>Corrective</p>	<p>PMU, CI-Liberia, CI-GEF (Following MTE and next PIR)</p>	<p>Rejected. The quarter reports already use a colour code. Additionally, information from the Q4 report is what is fed into the PIR for that Fiscal Year</p>
<p>In the remaining part of the project, the PMU should devote more efforts to systematizing and disseminating the lessons learned from the project, especially those regarding the project's intervention model. With the help of CI-Liberia, any barriers should be removed for communication activities to take place. This should include developing and implementing a Communications Strategy and Action Plan, as well as regular regimented updates to connect stakeholders to the broader narrative.</p>	<p>Corrective</p>	<p>CI-Liberia, EPA, PMU (Immediately following MTE)</p>	<p>Agreed. CI Uses SharePoint for management of</p>

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<p>The Project must invest in a robust Knowledge Management system, including a designated website/repository for technical studies long-term. The project should also establish a dataset, with a GIS component, with all the relevant data needed to implement the NCA in Liberia. The dataset shall be shared online with the relevant stakeholders, that will be able to download and use them. The Project shall also identify external stakeholders which could benefit of this dataset.</p>			<p>knowledge.</p> <p>Also, having a designated website per project is unsustainable since it is unclear who will manage the website after the project ends. All this information might be lost because the website might be shut down after the project ends.</p>
<p>Improve the efficiency of decision-making and communication processes. The Executing Entities should address the challenges identified for efficient decision-making and communication by improving the project's governance system.</p> <p>In particular, multiple layers of approval should be reserved for the most strategic issues, thus letting operational decisions be made by the PMU. As for communication, the Executing Entities should make sure that staff involved in the project in different geographical locations and organizational roles can access updated information regarding project planning, progress and upcoming activities in a timely and user-friendly manner. This might be done either by creating new communication channels, or by improving the quality of those already existing, as considered appropriate. In any case, this should not cause an additional workload to the staff.</p>	Corrective	CI-Liberia, EPA, Project Steering Committee (Immediately following MTE)	<p>Agreed.</p> <p>The Project Manager is responsible for the day-to-day management of the project, with oversight from the Technical Director and Finance/Operations Director.</p>
<p>Develop an adaptation management strategy. Given the delays in implementation, CI-GEF and the Executing Entities, including the PMU, should jointly develop an adaptation management strategy to ensure the achievement of project targets. This strategy should draw on a realistic assessment of a) potential delays in the remaining part of the project (e.g., caused by COVID-19, disruption in management and MCS), b) available cofinancing; and c) of the scope that the project can achieve given the available human</p>	Corrective	CI-Liberia, PMU (Immediately following MTE)	Agreed.

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and financial resources, without sacrificing quality and depth of support.			
<p>Develop a consultative transition plan / sustainability strategy. Given the importance of linking the project with other initiatives to ensure continued work in the priority landscapes and sustained outcomes, the Executing Entities, with the support of the PMU, should formalize and implement a systematic, updated exit strategy. This strategy should be developed by involving project partners and cofinanciers, thus providing articulating the different opportunities that have been emerging, and should consider existing risks to project sustainability, including political risks (elections) and environmental risks (climate change impacts) among others.</p>	Corrective	CI-Liberia, EPA, PMU (Immediately following MTE)	Agreed
<p>Consider changing the format and approach to the PIR so that the narrative and ratings of the PMU, CI-Liberia and CI-GEF are treated as separate entries. This is best practice and aligned to the approach taken by other GEF Agencies. Decentralizing narrative and comments on progress would be an important check and balance, as well as improve the credibility of the project rating.</p>	Augmentative	CI-GEF (by 2024 PIR)	Rejected. In the PIR template, there are separate entries for the Executing teams and Implementing Agency
Consider a neutral third-party entity to manage GEF-funded projects going forward.	Augmentative	CI-GEF (No distinct timeline)	Agreed

CONTENTIOUS AREAS RAISED BY THE EVALUATOR

	COMMENT FROM THE CONSULTANT (CONTENTIOUS AREAS)	RESPONSES FROM CONSERVATION INTERNATIONAL
1.	<p>Designated project website is not operational, currently leveraging CI's infrastructure.</p>	<ul style="list-style-type: none"> • Having a designated website per project is unsustainable because it is unclear who will manage the website after the project ends. All this information might be lost because the website might be shut down after the project ends. • Setting up a website for the project is a matter that was already discussed with stakeholders, and they advised that they rather build on existing platforms - this feedback was also provided for the Liberia GEF-7 FOLUR project as well • There is an existing SharePoint repository where stakeholders can access all the project documents -David to provide access to stakeholders incase they cannot access it
2.	<p>Project implementation is <i>not successful</i>, despite the project's identification, concept preparation, appraisal, preparation of detailed project proposal and approval were adequate. Roles of executing partners are not playing out as envisaged in the Project's design. CI-GEF has provided moderately sufficient supervision and has allowed challenges to accrue, perhaps a function of weak governance. CI-GEF did address challenges in implementation when they became a bottleneck."</p>	<ul style="list-style-type: none"> • In the MTR report, the evaluator fails to acknowledge and extensively elaborate on the impact of the COVID-19 pandemic on the project and its contribution to the delays and challenges including the implication of impeding CI-GEF's supervision mission which is important in assessing project performance. • The Evaluator fails to capture the fact that the majority of the challenges raised in the MTR report are known to the PSC, EPA, CI-GEF, and other stakeholders and that discussions between the PSC and CI-Liberia to troubleshoot and resolve them have been going on for some time. • The EPA advised that recruitment of the project staff should be held off until CI and the EPA resolved some project-related issues. This is the reason why CI could not recruit project staff to replace the previous ones. • Regarding secondary data, the Evaluator focused their evaluation on outdated project reports (FY21, F22) and barely utilized the FY23 reports that we shared with them. The evaluator was unresponsive to CI's request to incorporate data from FY23 reports. • In some sections of the report, the evaluator declined to adopt the required rating scale outlined in their consultancy ToRs and uses random words. In

		<p>this instance: <i>“Project implementation is not successful”</i></p>
3.	<p>Contexts change and projects should be afforded the flexibility to revise outcomes and outputs that clearly cannot be achieved at the end of the project period and replace them with more rational and feasible alternatives.</p>	<ul style="list-style-type: none"> • This point is misleading since no formal request was made to CI to alter the structure of the Results Framework. • The Evaluator declined to add a clarification and to expound this point
4.	<p>Emerging lesson 2 - continuity in leadership and resourcing is key to project delivery and even more so in complex ones: too many resource changes within a project, especially key decision makers, can have significant negative impacts. Team chemistry and careful selection of project management can make or break projects.</p>	<ul style="list-style-type: none"> • There were no changes in the leadership of this project, except for the Project Manager, and Project Officer who resigned for reasons beyond the control of CI. • The technical Lead of this project was the Technical Director, while the finance lead is the Operations Director. • Also, it is important to note that CI as an institution has a robust, transparent, and competitive process for recruiting staff
5.	<p>Emerging lesson 3 - project teams need to be empowered to make decisions: Projects must be country-owned and country-led and delivery teams must have the latitude to make mistakes, learn from them and make firm decisions that stick. As part of the UN Secretary General’s Development Reform, accountability should be concentrated on the Project Manager. The PSC or Advisory Committee(s) should be sufficiently involved in daily execution (more than twice per year) to ensure engagement and facilitate rapid decision-making when needed. Based on Project Management best practice, clear escalation channels and service levels for triaging and resolving issues should be established so projects can focus on delivery.</p>	<p>All the four full time project staff (Project Manager, Project Officer, Contracts and Grants Manager, and Finance and Administration Manager) were Liberians who were supervised by two international staff (Technical Director and Operations Director). Besides, all the Project Steering Committee (PSC) that provides strategic direction and policy guidance and the Technical Advisory Committee (TAC) that provides technical oversight of the project was composed of only Liberians. This clearly shows country ownership of the Project.</p> <p>The PSC and TAC regularly met – quarterly and bi-monthly respectively.</p>
6.	<p>Emerging lesson 4 - too much time focusing on procurement, contracting, and administrative modalities can derail delivery: introduction of new requirements and the reopening of administrative procedures derail projects with many stakeholder contracts and disbursements. These need to be locked from the outset.</p>	<ul style="list-style-type: none"> • Agree that this can be done more efficiently if well-organized from the onset, but the project needs to follow open, transparent procedures that may take time based on the past precedent and best practices with previous GEF projects. • The Evaluator declined to provide more information regarding: what could be done to improve the situation and to address underlying issues e.g., Is it the lack of know-how about the financial processes?; Is it poor planning by the project teams and subgrantees e.g., impromptu procurement requests to the finance team yet these requests could have been made months earlier; Is it weak communication and coordination between the finance team, project teams, sub-grantees, and stakeholders?; Is it inadequate finance personnel coupled with a heavy work load? etc.

7.	<p>Emerging lesson 5 - Budget management should rest with the Project Manager if they are to be accountable for delivery. Projects with remote communities must be prepared financially to spend a lot of time in the field, as these are the key beneficiaries of projects in the GEF's eyes.</p>	<ul style="list-style-type: none"> • We agree that there needs to be strong management from the project manager in coordination with the finance lead. • The evaluator declined to capture that this needs to be in close coordination with the Finance lead that can provide the nuances of financial requirements, but agree
8.	<p>Recommendations: The Project must invest in a robust Knowledge Management system, including a designated website/repository for technical studies long-term. The project should also establish a dataset, with a GIS component, with all the relevant data needed to implement the NCA in Liberia. The dataset shall be shared online with the relevant stakeholders, that will be able to download and use them. The Project shall also identify external stakeholders which could benefit of this dataset.</p>	<ul style="list-style-type: none"> • Having a designated website per project is unsustainable since it is unclear who will manage the website after the project ends. All this information might be lost because the website might be shut down after the project ends. • This aspect was discussed awhile back and the stakeholders advised that they would rather build on existing Knowledge Management platforms - this feedback was also provided for the GEF FOLUR project as well • The Evaluator declined to capture that there is an existing Liberia NCA SharePoint repository where stakeholders can access all the project documents
9.	<p>System for data management and maintenance of records: Data and documents are were catalogued internally in specific folders, in compliance with the ISO 9001:2015 certified Quality Management System adopted by SETIN.</p>	<ul style="list-style-type: none"> • Neither CI nor stakeholders in Liberia have access to SETIN's folders. • The Evaluator declined to capture the CI's SharePoint Folder - which can be accessed by all stakeholders in Liberia and has all the information related to the NCA Project including the Evaluation documents
10.	<p>Challenges to the evaluation Delays and limitation sharing of key documentation by the Executing Agency: The timely availability of documentation was a persistent and ongoing limitation to the MTE, with the bulk shared during the mission to Liberia and some technical reports even trickling into March and April 2023. In some cases, these materialized in early May 2023, a week before the submission of the draft report (as in the Quarterly Reports for FY23), and in other cases not at all (such as the request for summary documentation regarding the changes in the role of the Moore Centre and adaptive management plan that was under development). In spite of constant reminders made by the MTE consulting team, the slow response time and in some cases the unavailability of documentation altogether, prevented the MTE consulting team from formulating a holistic picture of Project status from the outset during the Inception Phase and in many respects was like evaluating a moving target.</p>	<ul style="list-style-type: none"> • While we acknowledge this as a challenge, the evaluator fails to mention that delays in re-sharing the documents were significantly caused by technological issues on SharePoint in that the majority of the documents were bulky and already uploaded on SharePoint (at times severally) but they ended up being blank. Additionally, the evaluator also does not mention that some of the requested documents were also shared through other platforms such as WeTransfer since SharePoint was proving to be a challenge. • CI's decision to restructure the MCS and redefine its institutional priorities took place during the MTE period - this is the only part of the project that was a "<i>moving target</i>" and was understandable given the uncertainties at the time. The decision-making process took some time and the CI teams had to await guidance from the CI Leadership before trickling down information to the stakeholders and Evaluators. Additionally, the evaluators wanted to sit in as "observers" in the CI internal meetings about this matter;

		<p>however, the CI Leadership decision-making process did not need the participation of the evaluators.</p> <ul style="list-style-type: none"> Regarding CI not sharing the adaptive management plan with the evaluator (in relation to the Moore Center pulling out from the project): The Evaluator fails to mention that CI notified them that the next steps regarding MCS pulling out from the project required high-level internal deliberations and approvals before communicating to the Liberian stakeholders and the evaluator and that this process would take time. Nevertheless, despite the MCS pulling out, the NCA component will remain and the pending tasks will be finalized by a consultant.
11.	<p>GEF evaluation policy not followed with respect to GEF Operational Focal Point (OFP) engagement: The GEF Evaluation policy is unequivocal about the roles and responsibilities of the GEF OFP and how they ought to interface with an MTE. Per the policy, “The GEF OFPs will be informed of midterm reviews and terminal evaluations and will, where applicable and feasible, be briefed and debriefed at the start and at the end of evaluation missions. They will receive a draft report for comment, will be invited to contribute to the management response (where applicable), and will receive the final evaluation report within 12 months of project or program completion”. Despite several requests made to CI-Liberia and the GEF Agency, the MTE consulting team was not able to engage with the OFP. There is a clear misalignment of the role of the GEF OFP and their function to collaborate on monitoring and evaluation at project, program and portfolio level.</p>	<ul style="list-style-type: none"> This point is misleading since it insinuates CI a) blocked the engagement of the OFP/is not supportive of the OFP being engaged yet the CI-GEF Evaluation consultancy Terms of Reference require the OFP to be consulted by the Evaluator The Evaluator fails to mention that the OFP (a High-level Government official) was not able to meet them however, a competent Government official that works closely with the OFP was delegated to be consulted. The OFP vested all project-related information to The EPA’s Multilateral Environment Agreement (MEA) Manager, whom the MTE consultant met. Per the reporting and communication structure between the EPA and CI, all briefings and issues related to the CI-GEF projects in Liberia (including this project) are channeled through the EPA MEA Manager who relays to the EPA Executive Director (also the OFP). Noting that the GEF policy on engaging the OFP also states the following regarding engaging the OFP: "where applicable and feasible be briefed and debriefed at the start and at the end of evaluation missions." - The EPA MEA and CI-Liberia share information with the Liberia OFP.
12.	<p>Reluctance by stakeholders to openly participate and value the MTE: On several occasions, key stakeholders were reluctant to actively participate in interviews and stakeholder consultation and embrace the opportunity that the MTE brings, with a case of verbal aggressive reaction and a couple of cases of requests for financial compensation to participate to the consultative meetings. This is consistent with an undercurrent of resentment that has been observed in a number of</p>	<p>CI requested the evaluator to provide additional information regarding this point but the Evaluator was unresponsive. It would have been useful for the Evaluator to indicate at whom the “<i>resentment</i>” was targeted and to expound on the “<i>characteristics of some of the relationships between stakeholders</i>”</p>

	<p>interviews, which characterizes some of the relationships between stakeholders.</p>	
<p>13.</p>	<p>Difficulties accessing local communities and beneficiaries: One of the key beneficiaries of the NCA project are local communities. Per the methodology outlined in the Inception Report, the MTE consulting team places great importance on the engagement of local communities. However, efforts to access communities during the fact-finding mission and thereafter faced multiple hurdles, stonewalling and resistance to problem-solve and find viable solutions in accessing remote communities. In some cases there was a palpable feeling that restrictions were being placed on accessing communities of the MTE consulting team's choosing.</p>	<ul style="list-style-type: none"> • The Consultant was provided with a list of all local communities to choose from. However, the selection of where to go was entirely left to the consultant and CI would support and facilitate. As such, the consultant only visited two communities in Grand Cape Mount as they were not willing to spend a night in the field. Yet, visiting all the local communities involved spending some nights in field locations. In addition, the consultants only visited two communities because they assumed that the local communities were homogenous, which is very questionable. • At the start of the Evaluation, CI communicated that there are communities that could be accessed easily and some that were in remote locations, and we needed to plan in advance before visiting those sites. Additionally, CI requested the evaluator to capture this fact in the report but they declined • The evaluator fails to mention that they did not respond to CI's request to facilitate another visit for them to go to the project site so that they could consult the communities - this could have been done easily since the evaluation team also comprised of a national consult based in Liberia • The Evaluator declined to add more information and to substantiate the following claim: " <i>However, efforts to access communities during the fact-finding mission and thereafter faced multiple hurdles, stonewalling and resistance to problem-solve and find viable solutions in accessing remote communities. In some cases there was a palpable feeling that restrictions were being placed on accessing communities of the MTE consulting team's choosing.</i>" • The evaluator fails to mention that they consulted some communities despite the challenges.
<p>14.</p>	<p>Actions which impinge on the independence of the MTE: During the MTE there were a number of events or actions taken which encroach on the independence of the consultant team's findings and entitlement to independence. Other instances of unprofessional behaviour have</p>	<p>Conservation International's responses to the respective points are provided below:</p> <ol style="list-style-type: none"> a. Formal complaints and allegations against the Evaluator's conduct and unethical behavior including verbal harassment, intimidation asking invasive

created a challenging work environment for the MTE consultant team. Some examples include the following:

- a. Conservation International questioning reasons why the MTE consultant team would like to request an interview with previous Project Managers, mentioning questions from stakeholders.
- b. CI-GEF recommending and dissuading the MTE consultant team from engaging with and interviewing the Moore Centre as part of the evaluation.
- c. Inserting recommendations into the draft MTE report which have not been discussed and corroborated by evaluation team as part of the fact finding phase;
- d. Inserting figures and requesting data in the draft MTE report be presented in ways in which the TORs are not prescriptive.
- e. CI-Liberia contacting SETIN's national consultant and displaying unprofessional and aggressive behaviour towards them regarding the findings of the MTE;
- f. CI-Liberia contacting the EPA in July 2023 to indicate SETIN had yet to submit a draft MTE report, when in fact, it submitted on 10 May 2023 but not shared with the EPA at that juncture. Between mid-June and July 2023, SETIN has been heads down responding to the significant number of comments and responding to these in a 117+ page audit trail in July.

questions, etc. were launched to CI and this matter needed to be formally investigated.

- b. The Consultant was provided with the contacts of the previous Project Managers. In fact, the MTE team interviewed previous project staff and did not corroborate the information, especially on the reasons for their resignation from CI Liberia
- c. The point regarding CI-GEF "recommending and dissuading the MTE consultant team from engaging with and interviewing the Moore Centre as part of the evaluation" is misleading: The Evaluator a) wanted to be part of the CI-Leadership internal deliberation meetings about the next steps after the MCS pulled out from the NCA project b) was pushing to learn CI's adaptive management after the MCS pulled out yet CI-Leadership was still figuring out the way forward.

There were uncertainties at the time that needed to be resolved internally at CI first before engaging the evaluator. CI-GEF clearly explained to the Evaluator that they should hold-off contacting the Moore center and the reason was the MCS was being restructured and internal Leadership deliberations were still ongoing regarding the implication on the NCA project. Overall, there were uncertainties at the time that needed to be resolved internally first before engaging the evaluator.

- d. We acknowledge that we should have discussed before inserting content, however, the draft document was poorly written, had major gaps, and inconsistencies and was not flowing hence the need to guide the evaluator. These insertions should have been deemed recommendations and the evaluator could choose to integrate or reject (which they did). Additionally, the majority of the sections that were inserted were not contentious and were facts based on the GEF-endorsed NCA project documents. Also, the information that was inserted were excerpts from other Evaluations and were meant to be an example of how those sections should be written and how to better present the information. **Overall, the Evaluator is not receptive to guidance especially when the guidance is factual.**
- e. A formal complaint against SETIN's National consultant was brought to CI. **CI-Liberia did not contact the National consultant, it is vice versa.** The

National Consultant is accused of allegedly verbally harassing and intimidating a CI staff because of their comments in SETIN's MTR report.

- f. CI will ensure communication with the EPA is streamlined.
- g. CI would have appreciated it if the Evaluator notified CI immediately regarding the Government following up directly with them about the report since it is not the consultants responsibility to manage the relation with the Government.

In addition to the challenges outlined by the Evaluator, CI also adds the following:

- a. Formal complaints and allegations against the Evaluator's conduct were launched to CI during the evaluation period
- b. Regarding secondary data, the Evaluator based their evaluation on outdated project reports (FY21, F22) and barely utilized reports from FY23. The evaluator was unresponsive to CI's request to incorporate data from FY23 reports. On this basis, the findings of the MTR are questionable.
- c. The Evaluator was not transparent regarding all the respondents that they intended to consult.
- d. The Evaluator declined to provide backup information to substantiate aspects in the MTR report that were deemed untrue.
- e. The Evaluator declined CI's offer to consult more communities since the sample size used was small. Only one or two communities were visited because the Consultant assumed these communities to be homogenous
- f. CI recognizes that the Evaluation is independent, however, the Agency is expected to guide the process. The Evaluator refused the majority of the guidance that CI provided – and these were facts.
- g. In some sections of the report, the evaluator declined to adopt the required rating scale outlined in their consultancy ToRs and used random words to rate. For example:
 - When rating individual outputs, the Evaluator used words such as "achieved", "partially achieved" or "not achieved" instead of being guided by the six-point rating scale that ranges from Highly satisfactory to Highly Unsatisfactory. This also makes it difficult to quantitatively assess the output ratings
 - Implementation section, under the narrative: "Project implementation is

		not successful” instead of the correct rating scale.
15.	<ul style="list-style-type: none"> The value of coastal natural capital is not effectively mainstreamed into the national development policies and strategies, as there is no activity in place to effectively integrate the conservation and maintenance of natural capital and ecosystem services into development actions. Public officers and decision makers responsible for the design and implementation of national development policies and strategies were involved in the project activities, are aware of the importance of NCA and capacitated, but there is no concrete action (such as a road-map) in place to translate technical knowledge and awareness in policy actions Barrier #3 “Inadequate legislation and gaps in national policy” was not addressed. The project, during its first half of implementation, focused most of its efforts on capacity building, without specific actions, such as a road-map, to reduce the gap in the national policy. 	<p>NCA was mainstreamed into the Liberia’s revised NDC. Also, a draft National Strategy and Action Plan (NSAP) for the implementation of NCA in Liberia has been developed and is under review.</p> <p>Policy assessment was conducted and six priority policies for mainstreaming NCA were identified including the Pro-Poor Agenda for Prosperity and Development (PAPD), National Environmental Policy of 2003, National Forest Policy and Implementation Strategy of 2006, National Policy and Response Strategy on Climate Change of 2018, Fisheries and Aquaculture Policy and Strategy, 2014, and National Energy Policy of Liberia (NEPL).</p> <p>According to the workplan, the roadmap for NCA is slated to be developed in FY24 - which falls outside the purview of this MTE</p> <p>Useful to note that NCA is a new concept in Liberia, the Natural capital accounts are just being developed, and overall, updating legislative frameworks takes time - on this basis, it is unrealistic to assume that there should be already policies and/or development actions that have integrated NCA - especially since this project is the first initiative that is attempting to do so</p>
16.	<p>It’s important to underline that the NDC cannot be considered a development policy or strategy, but a key-document to inform policies and strategies. No evidence of integration of NCA into other policies and strategies has been found. In FY22 the project made progress towards completing the technical development of a coastal natural capital account.</p>	<p>The objective of the project is to improve conservation and sustainable use of Liberia’s coastal natural capital by mainstreaming the value of nature into Liberia’s development trajectory. NDC is one way of mainstreaming the value of nature/coastal ecosystems into the development plans of Liberia.</p> <p>The revision of Liberia’s NDC revision was anchored upon key national planning policy and strategic interventions including Pro-Poor Agenda for Prosperity and Development (PAPD) (2018-2023); Environment Protection and Management Law (2003); National Environmental Policy (2003); the National Climate Change and Response Strategy (2018); and Liberia’s Rising Vision 2030.</p> <p>Liberia’s NDC cuts across nine key sectors – Agriculture, Forests, Coastal zones, Fisheries, Health, Transport, Industry, Energy, and waste, which present a platform to integrate Liberia’s Low Carbon Development Strategy into the country’s medium-term development agenda (PAPD) as well as its long-term sustainable development vision by 2030 (Liberia’s Rising Vision 2030).</p>

		<p>By including the key coastal ecosystems into Liberia's revised NDC shows that there is an appreciation of the value of coastal ecosystems into the development of Liberia.</p> <p>Also, policy assessment was conducted that identified five key policy priorities that the Project should influence including the Pro-Poor Agenda for Prosperity and Development (PAPD), National Environmental Policy of 2003, National Forest Policy and Implementation Strategy of 2006, National Policy and Response Strategy on Climate Change of 2018, Fisheries and Aquaculture Policy and Strategy, 2014, and National Energy Policy of Liberia (NEPL).</p>
17.	<p>The agreements are being implemented, but it's not clear how and to what extent the foreseen conservation actions are being implemented, and which are the results and the expected and achievable impacts on NCA maintenance</p>	<p>The consultant did not bother to delve deeper to get more information about conservation agreements.</p> <p>Conservation agreements are implemented to reduce the pressure on mangroves and other coastal resources through provision of various socio-economic benefit packages for resource users. Conservation Agreements (CAs) are also implemented as a mechanism to simultaneously promote conservation whilst providing opportunities to improve livelihoods and socio-economic local development needs and priorities in return for conservation actions by communities.</p> <p>In a CA, incentives are offered to local communities in exchange for conservation actions. Coastal resource users commit to conservation actions in exchange for benefit packages that are defined through participatory processes. As benefits depend on the community keeping to its side of the agreement, monitoring is conducted to assess improved conservation-orientated behavior.</p> <p>The central premise of CA is that people will conserve natural resources if they have the option to do so, and if the benefits of conserving outweigh the costs. CA Benefits may typically include funding for social services like health and education, as well as investment in livelihoods, etc. Examples of conservation commitments in CAs include forgoing forest clearing, adopting sustainable fishing practices, and participating in patrolling and monitoring activities. Rigorous monitoring is conducted to verify compliance with agreement terms and to track both biological and socioeconomic impacts.</p>
18.	<p>Under outputs, the consultant reports progress as either partially achieved or not achieved</p>	<p>Flagged these outputs are not completed since this is a MTE and not a TE but the consultant declined to amend the wording</p>

19.		<p>Most sections under progress to outcomes and outputs dwelt on activities: CI provided guidance that the assessment should not dwell too much on activities and instead also assess and report against the targets, Including what is the progress so far towards achieving the targets; What are the challenges affecting the actualization of the target; What are the evaluators recommendations to ensuring the target is realized?</p> <p>Per the ToR: An identification and assessment of the factors that affected delivery of outputs should also be included. CI flagged this and the evaluator declined to provide the information</p>
20.		<p>The report is heavy of qualitative assessment and weak on quantitative data and assessment. This was raised but the evaluator declined to action</p>
21.		<p>Under output 2.1.2. the evaluator outlines tasks from a the ToRs of a consultancy and does not indicate the lesson to learn or value add of this information.</p>
22.	<p>Data for the design, justification and eventual gazettement of coastal protected areas in southeast Liberia were generated, but the MTE team cannot assess the quality and the usability of such data.</p>	<p>The NCA project does not have any activity on gazettement.</p>
23.	<p>Emerging lesson 1 - more pragmatism and appreciation of systemic constraints (at national and local level) at the design of project targets during the project formulation phase, so they are not entirely out of reach from those who ultimately manage projects: While GEF projects must be ambitious to achieve global environmental benefits, they need to balance and take into consideration the sphere of influence of the management teams that implement them so as not to set them up for failure with unrealistic expectations and targets that are complex, especially those related to species. This is especially true in mainstreaming projects where there is a need to ensure that projects straddle and feed into government processes and timelines. Contexts change and projects should be afforded the flexibility to revise outcomes and outputs that clearly cannot be achieved at the end of the project period and replace them with more rational and feasible alternatives.</p>	<p>This statement is misleading since it appears that CI is not open to adaptive management yet no request to alter outcomes and outputs was made by stakeholders and executing teams.</p> <p>The design of this project involved multiple stakeholder groups including government institutions, civil society, local and international non-governmental organizations, academia, and local communities, which led to the identification of barriers that this project would address and the alignment to national and international policies and plans as described in the Project Document.</p> <p>The NCA project does not have any targets related to species.</p> <p>Also, after the approval of the project, work plans and budgets were revised in line with GEF guidelines. Specifically, during the development of the project's implementation workplan, activities and outputs were revised in compliance with GEF guidelines.</p>

24.	<p><u>The Policy Assessment Report, while a step in the right direction, falls short of defining a roadmap and articulating which national development policies, strategies and plans will be targeted for this project specifically, and how.</u></p>	<p>According to the workplan, the roadmap for developing additional NCA accounts is slated to be developed in FY24 - which falls outside the purview of this MTE. Nonetheless, <u>policy assessment was conducted that identified five key policy priorities that the Project should influence including the Pro-Poor Agenda for Prosperity and Development (PAPD), the National Environmental Policy of 2003, the National Forest Policy and Implementation Strategy of 2006, the National Policy and Response Strategy on Climate Change of 2018, Fisheries and Aquaculture Policy and Strategy, 2014, and National Energy Policy of Liberia (NEPL).</u></p>
25.	<p>It is still difficult and somewhat premature to verify with conviction the true impact of the NCA project at mid-term, since there are still products in the process of delivery given the delays incurred thus far, which in the most extreme cases are 2 years behind schedule from the original milestone dates identified in the early Annual Work Plans before being pushed out in successive progress reports and PIRs due to delays (i.e., Output 1.1.2, Output 1.1.3, Output 1.1.4, Output 1.1.5, Output 1.1.7, Output 2.1.2, Output 2.1.3, Output 3.1.2). There are and many other deliverables that are in the early stages of validation, are still in draft format or have yet to be formally presented and approved by the Project's governance mechanisms.</p>	<p>Impact is usually evaluated at the end of the project and not mid-term. Howbeit, the project has registered some key achievements as outlined below:</p> <p>Component 1: A total of 28 (23 men and 5 women) government officials and other relevant stakeholders were trained on the technical aspects including introduction to ecosystem accounting, the overview of ecosystem accounting concepts; the introduction to ecosystem accounting; the policy applications of NCA focused on six priority policies namely the Pro-Poor Agenda for Prosperity and Development (PAPD), National Environmental Policy of 2003, National Forest Policy and Implementation Strategy of 2006, National Policy and Response Strategy on Climate Change of 2018, Fisheries and Aquaculture Policy and Strategy, 2014, and National Energy Policy of Liberia (NEPL). In addition, five (5) priority natural capital accounts were established namely: Ecosystem Extent, Ecosystem Condition, Ecosystem Services Flow (crop provisioning, wood provisioning, fisheries resources, climate regulation, soil erosion control, and coastal protection), Monetary Assets, and Thematic Accounts (focusing on biodiversity and species accounts). Against that backdrop, a national strategy and action plan was established for the implementation of Natural Capital Accounting (NCA) in Liberia.</p> <p>Component 2: A total of US\$ 2,185,000 was secured. US\$ 185,000 was secured from Broadleaf for the development of the Project Identification Note (PIN), Project Opportunity Profile, and feasibility study for carbon projects in Marshall and Lake Piso. While US\$ 2 million was secured from the World Bank supported Liberia Sustainable Fisheries Management Project granting facility to build capacity of local fisherfolks and provide support to Small and Medium Enterprises (SMEs) in coastal areas. Also, discussions are ongoing with Proctor and Gamble to fund a blue carbon worth US\$ 25 million for 25 years (US\$ 1 million p.a.).</p> <p>Component 3: A total of 2,449.67 ha of mangroves and 551.09 ha of terrestrial</p>

		forest have been protected by six communities that signed conservation agreements in FY22.
26.	Enhancing carbon sequestration in and around coastal areas in target mangrove forests is progressing at the theoretical level through studies of blue carbon potential. Carbon coefficients were developed, and carbon stocks have for the most part been assessed but are not exhaustive. <u>Financial resource targets for for the sustainable management and restoration of coastal ecosystems</u> Restoration targets however are not on track.	A total of 2,449.67 ha of mangroves and 551.09 ha of terrestrial forest have been protected by six communities that signed conservation agreements in FY22
27.	Contracting delays and slow project start-up are the main threats to projectgramme performance and impact. Qualified environmental expertise is available in Liberia but not called upon leading to <u>perception of an</u> overreliance of international consulting firms with no clear knowledge transfer. As a result, various technical deliverables face extended contracting delays that weaken implementation and lower projectgramme delivery. Project timelines are sometimes insufficient to achieve project objectives or contribute meaningfully to the outcome also given the outsourcing model.	All consultancies above US\$ 5000 are advertised internationally for a month (30 days). As such both local and international applications were received and evaluated based on the predefined criteria. In addition, all international Consultants hired local consultants to undertake the assignments.
28.	<u>Significant institutional framework and governance risks prevail in the case of policies and technical studies prepared by the Project, as these are available in draft form or have just been initiated and their timely approval is not fully ensured at MTE, as there has not been discussion on an exit strategy and transitioning the products and services to other entities. It is unclear how the Project will replace the involvement of key institutions key to NCA accounts. This is compounded by weak coordination and communication with government and other partners.</u>	<p>The project has engaged 45 institutions including 16 Government agencies, 19 local communities, four private sector institutions, three Civil Society organizations, and three academic institutions.</p> <p>There is a government focal point person for this project</p> <p>PSC and TAC are functional</p> <p>A total of 28 (23 men and 5 women) government officials and other relevant stakeholders were trained on NCA.</p>
29.	Governance risks are substantial for community agreements and community-based organizations established by the Project also bear substantial governance risks due to limited capacities and lack of political equity. Environmental risks are high and concerning since the Project is putting insufficient emphasis on environmental sustainability through conservation agreements, <u>which have been allowed to lapse.</u>	<p>For the governance of Conservation Agreements, a conservation agreement committee was established for all the six communities that had signed CAs.</p> <p>Also, Frontline Conservationists who are selected from the local communities conduct forest patrols and conduct awareness raising in their respective local communities.</p> <p>It is important to note that CAs are signed periodically – usually after one year where they are appraised and renewed following a renegotiation exercise. It is true that during the MTE, the CAs had elapsed but were to be renewed once a</p>

		<p>substantive Project Manager had been recruited.</p> <p>It is not true that the project is putting insufficient emphasis on environmental sustainability since a total of 2,449.67 ha of mangroves and 551.09 ha of terrestrial forest have been protected by six communities that signed conservation agreements in FY22.</p>
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