



## FAO-GEF Mid-Year Implementation Update

Period covered: 1 July 2020 to 31 March 2021



### 1. Project Basic Data

#### General Information

<b>Region:</b>	Europe and Central Asia
<b>Country (ies):</b>	Turkey
<b>Project Title:</b>	Conservation and Sustainable Management of Turkey's Steppe Ecosystem
<b>FAO Project Symbol:</b>	GCP/TUR/061/GFF
<b>GEF ID:</b>	5657

#### Review and Evaluation

<b>Expected Mid-Term review date:</b>	-
<b>Actual Mid-term review date:</b>	14 November 2019
<b>Terminal Evaluation Date planned (if applicable):</b>	-
<b>Expected Project Completion date (NTE):</b>	30 June 2022

#### Project Contacts

Contact	Name, Title, Division/Affiliation	E-mail
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## 2. Information on Progress, Outcomes, and Challenges of Project Implementation Activities

Please structure your response as follows:

1. *Progress since the FY20 update.* Assess component by component the progress of activities and delivery of outputs (and outcomes, if appropriate) in relation to the implementation plan to deliver on the project objective. Please provide one or two paragraphs per component summarizing the progress of each outcome.
2. *Challenges.* Provide an update on the key challenges faced by the project such as procurement, disbursement, audit findings, co-financing, M&E, and effectiveness. This section should look in particular at how the challenges posed by COVID-19 are impacting project activities.
3. *Adaptive measures and actions.* Highlight the workarounds identified to adapt and enhance implementation. References to proactive actions being taken to improve implementation should be highlighted here, including management change, update in activities and possible project restructuring.

'The Conservation and Sustainable Management of Turkey's Steppe Ecosystems Project' was endorsed by GEF on 28 April 2016. The Project Agreement was signed by the Government on 24 October 2016, and the project became operational on 15 January 2017.

### **Component 1: Effectiveness of protected area system to conserve steppe biodiversity increased**

Under component 1, five sets of guidelines that provide standards and recommended practices for the management of Turkey's natural assets have been finalized and endorsed by the Ministry in mid-2020.

The Guidelines for

- Establishing Protected Areas
- Protected Area Management Planning
- Biodiversity Monitoring
- Engaging Stakeholders in Managing Protected Areas
- Assessing the Management Effectiveness of Protected Areas

Even if, the preparation process had started in the second year of the project, completion of the guidelines took longer than expected. However, the process has been completed during this period, and final steps are being taken to upload to the system.

Several awareness-creation materials and publications have been published in terms of results of the project activities, national and provincial level steppe conservation strategies and field survey results. This was done in order to conduct communication activities, inform the stakeholders and raise public awareness.

Due to Covid-19 pandemic, the meetings and workshops took place via zoom platform. Several technical meetings were held with the implementing partners, Working Groups and Independent Expert Groups.

In addition, several small group meetings were held with the contracted companies and LoA holders (PGlobal and DKM teams) to finalize the publications and awareness materials such as brochures, booklets, posters, etc.

Although one of the important activities was the completion of management plans for the pilot project sites, unfortunately, the project was not able to achieve sufficient success on it. Even if, the tendering process for management plans of the Kızılıkyu Wildlife Development Area, Tek Tek Mountains National Park and the Karacadağ Steppes were initiated in 2019, due to a lengthy of preparation process for RFP, the tender announcement was held on January 1st 2020 and its evaluation was completed by beginning of 2021 and contract signing was in mid of March 2021. Due to delay in the tendering process, linked activities such as drafting a specific Species Action Plan for management and conservation of important (flagship) species were not able to start in this period.

Establishment of a rigorous monitoring program for three steppe protected areas is one other main activity under this component. The current LoA with the Doga Koruma Merkezi (DKM) was amended and signed on 10 June 2020. The Monitoring Program was drafted by the LoA partner in close cooperation with FAO and the Ministry team. It was reviewed by the partners at the end of December 2020. Right after that, the final- draft Monitoring Program will be developed and finalized by the end of April 2021 according to the LoA (which was granted a no-cost extension).

## **Component 2. Steppe biodiversity conservation mainstreamed into production landscapes**

Under component 2, two sets of guidelines that provide standards and recommended practices for the management and monitoring of Turkey's pastures have been finalized and endorsed by the Ministry in mid-2020. The process for these two guidelines have been conducted as similar with above listed five guidelines.

- The Guidelines for Grazing Management Planning
- The Guidelines for Grazing and Livestock Monitoring

Identifying the best grazing management models for each site and developing grazing plans for the three sites are the main activities under this component. Due to the cancelation of the first tender, and initiation of a re-tendering process, implementation of this activity took longer than planned. Besides, due to a lengthy technical clearance and preparatory process for re-tendering and evaluation, the contract was signed on 15 March 2021. The implementation process has started.

The livestock monitoring program is being developed together with producing and putting in place a monitoring program for the three project pilot sites under the guidance of the BD Monitoring Guideline.

During this reporting period, several materials such as training manual and booklets, brochures, posters have been drafted by the Global Advisory and Training Services Inc. (PGlobal) within the scope of the Contract Agreement signed on 16 December 2019. This was done in order to conduct a modal steppe conservation training program for pastoralists.

Due to continuing spread of COVID-19, implementation of the training programs had to be postponed, and, therefore, no planned activities regarding the training programs were fulfilled in 2020. In order to compensate these unexpected turnouts, no-cost extension amendment was carried out, and, in turn, all envisaged training activities were moved from 2020 to 2021. First training will be organized in the third week of April and will follow through mid-June 2021.

### **Component 3: Enabling environment established for effective conservation of steppe biodiversity across large landscapes**

An LoA was signed between FAO and DKM on 21 March 2019 for implementing the activities under Component 3. Two strategies that will support collaborative and participatory management of Turkey's steppe ecosystems in Sanliurfa Provincial level and National level have been completed in close cooperation with a large number of stakeholders and ministry partners. A working group was established during the January-June 2020 period and the group members took part in all meetings and studies within this period to finalize the strategies.

Several technical meetings and team meetings were held to develop the Sanliurfa and National Steppe Conservation Strategies and Action Plan between July and December 2020 with the participation of the implementing partners, national working group, scientific board and ministry staff during the reporting period. These two strategies were completed and will be published in second quarter of 2021.

Due to Covid-19 pandemic, the meetings and workshops took place via zoom platform.

Moreover, two workshops were held to finalize the two strategies with participation of large number of stakeholders. A face to face meeting was held in Sanliurfa on 13 October 2020 with the high-level participants from Ministry and Sanliurfa Governorship in order to carry out the final evaluation of the Şanlıurfa Steppe Conservation Strategy and Action Plan.

Within the scope of designing and implementing a steppe conservation and management training program for agricultural and national parks extension staff, several publications were drafted and several activities were implemented. For instance, education activities were planned for schools and majority of them implemented in previous period. However, due to Covid-19 pandemic, some others have been postponed. After a long break, new school activities were planned once again for the remaining schools. The wall painting activities were performed between 17-20 November 2020 in two schools in Küçüksenemmagarası and Karacadağ. Remaining two school activities in Ekinci and Karabahçe will be conducted on 23 April 2021.

In the framework of the training activities, a steppe training kit was completed. The kit includes a guidebook for teachers, and 4 activity books. Besides, several training materials such as Booklet, Poster, Brochure, Illustrated Map about steppe plants, steppe animals, archeology/history of steppes, life in steppes, ancestors of wheat, Turkey's steppes and Sanliurfa Steppes (both in Turkish and English versions) were completed and designed, accepted by the ministry. All training materials have now been published.

One of the training activities planned for this reporting period was a training seminar for teachers. Due to the Covid-19 pandemic, the face to face training had to be cancelled, nevertheless, it was conducted through zoom online platform.

Life in Steppes Poetry and Painting Competition was another training activity planned. As a result of the devoted efforts of teachers and administrators from the schools which are located in the project sites Kızılkuyu Wildlife Development Area, Tek Tek Mountains National Park and Karacadağ steppes, a total of 29 students submitted their works. The awards and certificates were distributed to the winners in November 2020. FAO Assistant Represent, Aysegul Selisik, Deputy General Director, Mustafa Bulut and

other participants from the local Branches of the Ministry and Provincial Directorate of National Education were present in the field during the award ceremony that was held on 19 November 2020.

Additionally, Second National Steppe Conservation Workshop was held on 30 December 2020 with a large number of participants from the ministry, universities, NGOs and individuals to build an effective cooperation environment in order to increase the recognition and awareness of steppe ecosystems.

In addition, several small group meetings were held with the contracted companies and LoA holders (PGlobal and DKM teams) to finalize the publications and awareness materials such as brochures, booklets, posters, etc. Majority of the meetings were held via zoom platform.

### **3. Stakeholders Engagement**

**Please report on progress, challenges and outcomes on stakeholder engagement (based on the description of the Stakeholder engagement plan included at CEO Endorsement/Approval (when applicable))**

Due to unexpected impact of COVID-19 restrictions, a contingency plan has been drafted. Some project activities, including several workshops and meetings, study visits, field excursions, demonstration activities with journalists, several education activities, field visits and studies, have been postponed to future calendar dates due to result of COVID-19 measures. New adopted measures have also incorporated the stakeholder engagement plan and modality. Establishment of WhatsApp groups with key partners and local stakeholders, establishment of mail groups with the scientific and independent expert groups, using web-based applications to provide information flow among stakeholders, using survey monkey and cloud mapping applications were among these new modality approaches. Face-to-face meetings, small group meetings, zoom meetings and regular meetings with all related project partners and project team took place through these communication tools and it was mostly refrained from using back and forth email correspondences between parties in order to avoid possible delays.

In this period, several stakeholder participatory events such as one of the training activities for the teachers were also conducted. Due to the mandatory pandemic restrictions, face to face trainings were mostly cancelled. Life in Steppes Poetry and Painting Competition was another training activity planned. As a result of the devoted efforts of teachers and administrators from the schools which are located in the project sites Kızılkuyu Wildlife Development Area, Tek Tek Mountains National Park and Karacadağ steppes, a total of 29 students submitted their works. A certificate of appreciation was prepared for all participants. The awards were distributed to the winners in November 2020. AFAOR in Turkey, Aysegul Selisik, Deputy General Director, Mustafa Bulut and other participants from the local Branches of the Ministry and Provincial Directorate of National Education were present in the field during the award ceremony that was held on 19 November 2020.

Besides, several measures have been undertaken to address and alleviate the problems and to avoid the further delays of the project activities. For instance, the measures included organizing small groups and face-to-face consultations with various departments of the Ministry that were involved in providing

feedback on reports and terms of reference, and organizing technical meetings with bidders, LoA partners and implementing partners to come to a common understanding of the implementation strategy and expectations. Delays happened not only because of COVID-19 impediments, they happened also because activities were not being fulfilled on time. In addition, expected information were not obtained in time by the partners, also internal clearances and tender announcement durations took long time due to internal procedure of the FAO. Besides, achieving consensus on reports, products and technical proposals both internally and externally (FAO and Ministry partners) were required a significant amount of time to be completed fully. The lengthy tender processes and consequent evaluation and decision-making processes have been time consuming as well.

#### **4. Gender-responsive measures**

**Please report on the progress of gender-responsive measures taken as documented at CEO Endorsement/Approval in the gender action plan or equivalent (when applicable)**

This project is a nature conservation project. Beginning of the project, a detail social analysis were conducted. The working groups and detail stakeholder lists were drafted.

During the Covid-19 period, even if majority of the activities were conducted via zoom, some small face-to-face meetings and field studies were done as well. The list of the participants was drafted with taking into consideration of gender balance.

## 5. Knowledge Management Activities

**Please report on the progress of implementation of the project's Knowledge Management Approach approved at CEO Endorsement (when applicable), knowledge products documenting good practices, lessons learned, websites/ other platforms developed, a communication strategy adopted.**

Within the scope of the project, several training materials which had been produced earlier in the project were published during this period. Different groups were targeted including:

- teachers and students
- experts and decision-makers responsible for the management of protected areas,
- shepherds

The following materials are finalized, designed and published.

- Leaflets (6 leaflets, 2 pages A3 format)
- Booklets (5 different booklets)
- Film documentary, social media spot and thematic shorts films
- Posters (total 5)
- Village guidebooks for each project site (total 3)
- Teacher guidebook and activity books for kids on nature activities in schools

The following seven sets of guidelines providing standards and recommended practices for the management of Turkey's natural assets initiated since 2018 had gone through the process of drafting, designing, translation into Turkish and they were technically cleared for publishing in mid-March 2021. They still need to go through FAO's internal clearance before dissemination.

- Guidelines for Establishing Protected Areas
- Guidelines for Protected Area Management Planning
- Guidelines for BD Monitoring
- Guidelines for Engaging Stakeholders in Managing Protected Areas
- Guidelines for Assessing the Effectiveness and Efficiency of Protected Areas
- Guidelines for Grazing Management Planning
- Guidelines for Grazing and Livestock Monitoring

In addition, several training and awareness-raising materials were prepared, designed as part of the development and implementation of the "Training Manual and Resource Materials under the Model Steppe Conservation Training Programme For Pastoralists" component of the project. They include:

- Training Manual and booklets
- Five booklets
- Manual for the Users of Steppe Rangelands,
- Edible Wild Plants of Steppe & Wild Relatives of Cultivated Plants,
- Common Plant Species of Steppe Rangelands,
- Small Ruminant Breeding in Steppe Rangelands and
- Common Small Ruminant Diseases in Steppe Rangelands.

Five different brochures were completed, designed in close cooperation with the project team and ministry partners, and accepted by the ministry. The list of these brochures is given below.

- Plant Diversity of the Steppes
- Usage Calendar of the Steppe Rangelands
- Healthy Stock Raising in the Steppes
- Sustainable Management of the Steppe Rangelands
- Richness of the Steppe Rangelands& Wild Relatives of the Cultivated Plants

Five different posters were completed, designed in close cooperation with the project team and ministry partners, and accepted by the ministry. The messages and slogans which were used in the posters are listed in below:

- Our past brought up to date, our future passed on to tomorrow.
- If there is steppe then there is life - steppe rangelands are not only for grazing.
- They are also sensitive lands with rich biodiversity of species. Let's value steppes and conserve them.
- Proper grazing improves productivity and biological benefits of rangelands.
- In the silence of the steppes there are many invisible lives- see your future in the invisible steppe.
- If used in a planned and proper way, rangelands can rehabilitate themselves and survive; steppe rangelands prevent erosion by holding the soil. They prevent climate change by sequestering carbon. They host the wildlife. They provide habitat for insects and butterflies with their colourful plant diversity. They offer an enabling environment for pollination

Four newsletters were published during this period.

- 1st National Steppe Conservation Workshop for Common Understanding and Collaboration
- Guidelines Providing Standards and Recommended Practices for The Management of Steppe Ecosystems
- Steppe Conservation Awareness Activities for Children
- Surveys and Assessments on Biodiversity, Socio-Economic and Socio-Cultural Aspects, Ongoing Grazing Activities and Livestock Situation for Tek Tek Mountains National Park, Kizilkuyu Wildlife Development Area and Karacadag Steppes

Two stories were drafted and one of them was published.

- Capacity Building and Awareness on Conservation of Steppe Ecosystems. It was drafted as a case study for Gender mainstreaming practices of the projects in Turkey booklet.

Preparation of a web-page for the project is one of the ongoing activity.



## 6. Risks

RISK TABLE					
<i>The following table summarizes risks identified in the <b>Project Document</b> and reflects also <b>any new risks</b> identified in the course of project implementation. The <u>Notes</u> column should be used to provide additional details concerning manifestation of the risk in your specific project, <b>as relevant</b>.</i>					
	Risk	Risk rating <sup>1</sup>	Mitigation Action	Progress on mitigation actions <sup>2</sup>	Notes from the Project Task Force

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<sup>1</sup> GEF Risk ratings: Low, Medium, Substantial or High

<sup>2</sup> If a risk mitigation plan had been presented as part of the Environmental and Social management Plan or in previous PIR please report here on progress or results of its implementation. For moderate and high risk projects, please Include a description of the ESMP monitoring activities undertaken in the relevant period.

1	Challenges to project coordination	High	<p>Close and collaborative cooperation among numerous institutional stakeholders (particularly the MFWA and the MFAL) will be essential for the project to achieve its stated goal and objectives. Such cooperation is supported by the coordinating structure of the National Project Implementation Unit and existing collaboration with the project management team at FAO. As all relevant departments are represented in the Project Steering Committee, it will be the main task of this body to mitigate any challenges to project coordination.</p>	<p>As the project has several different partners and changes in the teams is inevitable. It is more likely that the members of the steering committee change as well. However here is a strong relationship and network with the ministry partners and NPC.</p> <p>NPC is working in close cooperation with the project team and the Ministry project team in order to strengthen collaboration and cooperation.</p> <p>Besides, formal and informal meetings and events between high level decision makers are being arranged to strengthen the collaboration and to support continuity of relationship and information flow.</p>	
2	Low capacity of local and national institutions	Medium	<p>National institutional capacity and technical expertise among MFWA/MFAL staff at various levels are weak. To mitigate this risk, the National Project Implementation Unit will support the institutional framework and technical capacity development at national and local levels, through a capacity-building programme and training at central and local levels.</p>	<p>The project foresees significant capacity-building activities and implementation of a communication plan</p>	

3	Climate change	Low	<p>Climate change will require evolving research on proposed approaches and new best practices. MFAL and MFWA, with their own unique research institutions and the contribution of FAO's technical expertise, are in a good position to steer research and adopt forthcoming results in the field. This will be the responsibility of the National Project Implementation Unit. Climate change impacts can also increase political support for the project.</p>	<p>The project is not directly affected by climate change, because of its effects can be seen in the long term period. Nevertheless, short rainy season and high temperature in summer season are affecting vegetation period of flora. In these circumstances, biodiversity related activities in the field are negatively affected. And this is because there is no possibility to observe or discover some of the species in these unsuitable conditions.</p> <p>In addition, due to these changes, the grazing is starting very early in the season before plants have had a chance to grow. This causes soil erosion and sometimes losing of the species.</p>	
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4	Low ownership and lack of sustainability of new technologies and techniques	Low	<p>Lack of ownership and subsequent lack of sustainability of new technologies promoted under the project could hinder attainment of desired adoption levels. This challenge will be mitigated through the above-mentioned capacity building programme and an awareness campaign targeted at project beneficiaries. The capacity-building programme will involve tools such as economic models and plans, with economic analyses clearly demonstrating the economic and social benefits of the adoption of these technologies (win-win). This will fall under the responsibility of the project's Field Office.</p>	The project foresees significant capacity-building activities	
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5	Incentives for local stakeholders are not adequate to generate engagement	Medium	<p>The project is designed to Low capacity of promote engagement with local stakeholders, ensuring that local resource users both female and male have the opportunity to help decide how best to conserve steppe resources. This effort will involve working directly with pastoralists to help them assess the economic benefits of various steppe conservation activities. For instance, the project will provide pastoralists with the technical support necessary to measure how improved management of steppe delivers both enhanced ecosystem services as well as improvements to livestock production and value. This approach will serve as a major incentive for local project support. Both the National Project Implementation Unit and the Field Office will be responsible for generating engagement.</p>	<p>Several working groups have been established to encourage intensive participation by local stakeholder.</p> <p>An independent expert group and local based stakeholder group have been established to strength stakeholder participation through the implementation process.</p> <p>Field level focal groups have been listed such as teachers, muhtars and academicians. The WhatsApp groups have been established with these different groups.</p>	
6	Regional political conflict may stimulate security measures limiting implementation	Medium	<p>Since the PIF was approved, political conflicts in the region have escalated. The project's pilot sites are located in areas relatively far from current conflict zones and places of security risk. FAO/Turkey and the government are certain that the project sites will continue to be considered safe zones throughout the implementation process. However, the situation will be continually monitored by the National Project Implementation Unit throughout the project period.</p>	N/A	

7	COVID-19 Pandemic	High	<p>The current pandemic situation will have a significant impact on implementation of the field-based activities. In order to avoid negative impact to the project implementation, wherever possible, to do meetings and events on-line and video-conferences.</p> <p>However, any field-based activities do not implement via IT based tools, therefore, field works such as surveys and investigations may be carry out with the small groups via take maximum precaution.</p> <p>Drafting contingency plan and use alternate tools and approach such as IT based implementation (zoom, skype business, etc)</p>	<p>Majority of the activities were conducted via zoom, small face-to-face meetings and field studies were done as well.</p> <p>IT based applications are mainly used and several WhatsApp groups have been established.</p>	
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**Project overall risk rating** (Low, Medium, Substantial or High):

FY2020 rating	Mid-Year 2021 rating	Comments/reason for the rating for Mid-Year 2021 and any changes (positive or negative) in the rating since the previous reporting period
M	M	

## 7. Development Objective Ratings, Implementation Progress Ratings and Overall Assessment

	Mid-Year 2021 Development Objective rating <sup>3</sup>	Mid-Year 2021 Implementat ion Progress rating <sup>4</sup>	Comments/reasons justifying the ratings for Mid-Year FY2021 and any changes (positive or negative) in the ratings since the previous reporting period
<b>Project Coordinator</b>	<b>S</b>	<b>S</b>	<p>All desk works such as preparing training and awareness materials and designing and editing guidelines, were completed. Several zoom meetings, face to face small group meetings were organized to follow-up on activities.</p> <p>Although a lengthy technical clearance and preparatory process for re-tendering and evaluation of a comprehensive tender regarding to the Management and Grazing Planning, finally, the process was completed.</p> <p>The implementation process for the postponed training programs for the ministry staff and pastoralists have been initiated. All the seven guidelines were edited and re-designed. Two steppe conservation strategies, one for Sanliurfa and one for National level were completed, and accepted by the Ministry partners. A comprehensive monitoring program was drafted. Tendering process for the grazing demonstration program is initiated.</p> <p><b>More importantly, the process overall has been managed effectively without any health problem and with strong connection and cooperation with the ministry partners and key stakeholders.</b></p>
<b>Budget Holder</b>	<i>Moderately satisfactory</i>	<i>Moderately satisfactory</i>	Due to the COVID 19 restrictions, several activities had to be postponed for 2021
<b>Lead Technical Officer<sup>5</sup></b>			

<sup>3</sup> Development/Global Environment Objectives Rating – please refer to Annex 1.

<sup>4</sup> Implementation Progress Rating – please refer to Annex 1.

<sup>5</sup> The LTO will consult the HQ technical officer and all other supporting technical Units.

<b>FAO-GEF Funding Liaison Officer</b>	<i>Moderately satisfactory</i>	<i>Moderately satisfactory</i>	<p>The project has found its rhythm of operation in the context of the pandemic and managed to publish several guidelines, training materials, and awareness raising material that were well received by project stakeholders. Though field work has been delayed, the advent of technologies like zoom have allowed the project to remotely continue with operations and capacity building. As vaccination rates advance in Turkey and it becomes safe to travel, the project is trying to maintain a field presence. In this context, the project managed to carry out a face-to-face validation of the Sanliurfa Steppe Conservation Strategy and action plan, a key milestone in the conservation of this important area. Finally FAO is working to address internal operational issues to speed up project delivery.</p>
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## Annex 1. – GEF Performance Ratings Definitions

**Development/Global Environment Objectives Rating** – Assess how well the project is meeting its development objective/s or the global environment objective/s it set out to meet. **DO Ratings definitions:** **Highly Satisfactory (HS)** - Project is expected to achieve or exceed **all** its major global environmental objectives, and yield substantial global environmental benefits, without major shortcomings. The project can be presented as “good practice”); **Satisfactory (S)** - Project is expected to achieve **most** of its major global environmental objectives, and yield satisfactory global environmental benefits, with only minor shortcomings); **Moderately Satisfactory (MS)** - Project is expected to achieve **most** of its major relevant objectives but with either significant shortcomings or modest overall relevance. Project is expected not to achieve **some** of its major global environmental objectives or yield some of the expected global environment benefits); **Moderately Unsatisfactory (MU)** - Project is expected to achieve of its major global environmental objectives with major shortcomings or is expected to achieve only **some** of its major global environmental objectives); **Unsatisfactory (U)** - Project is expected **not** to achieve **most** of its major global environment objectives or to yield any satisfactory global environmental benefits); **Highly Unsatisfactory (HU)** - The project has failed to achieve, and is not expected to achieve, **any** of its major global environment objectives with no worthwhile benefits.)

**Implementation Progress Rating** – Assess the progress of project implementation. **IP Ratings definitions:** **Highly Satisfactory (HS):** Implementation of all components is in substantial compliance with the original/formally revised implementation plan for the project. The project can be resented as “good practice”. **Satisfactory (S):** Implementation of most components is in substantial compliance with the original/formally revised plan except for only a few that are subject to remedial action. **Moderately Satisfactory (MS):** Implementation of some components is in substantial compliance with the original/formally revised plan with some components requiring remedial action. **Moderately Unsatisfactory (MU):** Implementation of some components is not in substantial compliance with the original/formally revised plan with most components requiring remedial action. **Unsatisfactory (U):** Implementation of most components is not in substantial compliance with the original/formally revised plan. **Highly Unsatisfactory (HU):** Implementation of none of the components is in substantial compliance with the original/formally revised plan.