GEF IEO RESPONSE TO GEF Secretariat Comments on the Concept Note of the IEO's "*Evaluation of GEF Support for Policy Coherence*"

REFERENCE TEXT	COMMENTS	GEF IEO RESPONSE
General Comment	While referring to the GEF's work on Policy Coherence, for increased clarity, consider specifying that in the context of the GEF, enhanced policy coherence is related to the generation of global environmental benefits.	No change. See last paragraph of Background section and Key Evaluation Question #1
General Comment	While the GEF has supported policy development and elements of policy coherence throughout the years, the mandate to explicitly focus on Policy Coherence has only recently been received in October 2023 at the 65th Council, with the approval of the council paper on policy coherence. Much of what was outlined in that paper as the GEF's workplan on policy coherence is still in nascent stages. Therefore, to be evaluated along these lines at this moment seems premature. Relatedly, to evaluate projects and programs going back to GEF-6 relative to the current definition and plan for 'policy coherence' is misaligned. It would be useful to rescope/revise and include this caveat in the paper as relevant. It is important to note that all policy development and policy reform activities do not necessarily address policy coherence as per the definition used by the GEF, which focuses on cross-sectoral policy alignment. Please consider revisions/clarifications accordingly.	No change. The evaluation does not restrict itself to the definition of "policy coherence" in the Council-approved October 2023 paper to assess GEF-6 projects. It uses a broader frame, as outlined in the Conceptual Framework section, based on how the terms "policy" and "policy coherence intervention" have historically encompassed a wider scope within the GEF context. The October 2023 paper (p.5) states that "while not explicitly targeted, policy coherence has been an increasing feature of GEF programming since inception". One aim of the evaluation is to assess how the GEF's approach to cross-sectoral policy alignment has evolved from when policy coherence was not the focus, so as to gain insights on what was effective and not effective, and thus provide inputs to current and future GEF programming.

REFERENCE TEXT	COMMENTS	GEF IEO RESPONSE
General Comment	The operationalization of policy coherence may vary from one country to another. The concept note does not explicitly outline how country-specific contexts will be reflected in this evaluation.	No change. The Conceptual Framework section (first paragraph, p.8 and figure 1) notes the importance of different country and sector contexts in the extent of policy coherence that can be achieved. The case studies in particular will give more insight into different country contexts.
General Comment	One important element of the GEF Partnership is the role of Implementing Agencies and how they align the respective GEF-funded projects with their overall country portfolios. This Concept Note does not take into consideration the role of the IAs on policy coherence outcomes. One particular example is the policy-related lending of the MDBs. Is there an effort on the side of the IAs to align their respective GEF portfolios to their larger policy-related work? Are there synergies to be explored? Would it be possible to identify best practices?	No change. GEF Agencies are among the corporate- and country-level stakeholders to be engaged through key stakeholder interviews, focus group discussions and an online stakeholder survey (see table 1). Key Evaluation Question #2b looks at contextual drivers and conditions that the GEF can leverage to support policy coherence, one of which is the GEF Agency. The evaluation will highlight differences in policy coherence approaches among Agency types, as well as any synergies, tools and good practices from their non-GEF work that may be applied in the GEF context.
General Comment	Most of the GEF's Policy Coherence related investments before GEF-8 were related to biodiversity mainstreaming. Please consider looking closely into that set of investments, specifically in some of the retrospective analyses that this evaluation aims to do.	No change. The portfolio of biodiversity mainstreaming projects may be reviewed as part of the "sample of completed projects working in sectors known for policy incoherence (e.g. agriculture, tourism, fisheries, water)" (p.9).

REFERENCE TEXT	COMMENTS	GEF IEO RESPONSE
General comment on the scope of the paper and sample of projects	Considering that (enhanced) policy coherence focus has been more explicitly introduced in GEF8 and, therefore, it is now too early to look at outcomes, one possibility could be for this evaluation to focus on the extent to which design stages documents have evolved between earlier phases and GEF8 (for the projects/programs approved to date, at least). While this would not give insights into the results, it would at least compare apples with apples. For instance, some programs now include specific selection criteria related to horizontal policy coherence requirements (i.e., participation in the project of more than one ministry), which are new to the GEF8 phase and could be interesting to highlight.	Emphasis added. The evaluation will compare changes in the project/ program screening templates, as well as the Council-approved PFDs and CEO-endorsed documents (see table 1).
Policy coherence, as defined in the Global Environment Facility (GEF) programming documents, refers to…	This definition is from the policy coherence Council Paper to the 65th Council, not GEF programming documents. Please adjust the text accordingly.	Revised. See first sentence of Background section, p.1
In the context of international development, policy coherence typically entails alignment among environmental, social, and economic policies to support the 2015 Sustainable Development Goals (OECD 2016; 2018).	This is the context of the OECD and how the OECD defines policy coherence, but it is not accurate to say that this is the general context of international development. For example, this is not the context of the GEF – we do not define or intend to measure policy coherence in terms of the SDGs. Please revise this statement accordingly.	No change. This statement refers to the broader international development landscape that the GEF is embedded in. The SDGs are mentioned as an international voluntary agreement that members of the GEF partnership (e.g. Agencies, donor and beneficiary countries) have pledged to work toward, thus requiring them to improve policy coherence in their respective contexts.
In September 2023, the GEF proposed a suite of activities to enhance policy coherence across its multiple levels of operation (GEF 2023).	The council approved this document during the 65th Council Meeting. Thus, please revise this sentence accordingly. Also, rather than a proposal, it is more accurate to refer to the document as a Council Paper.	Revised. See first paragraph, p.4
This evaluation aims to examine the GEF's past efforts in supporting policy coherence, assess the effects of its recent emphasis on this theme on the nature of support provided, and analyze the	While it is a fact that the GEF supported policy coherence in the past, we only recently have an explicit focus on policy coherence. Therefore, it would be useful if this caveat was made.	Emphasis added. See last paragraph of Background section (p.5) and first paragraph of Methodological Approach section (p.8)

REFERENCE TEXT	COMMENTS	GEF IEO RESPONSE
mechanisms through which it provides this support.	Furthermore, as stated in earlier comments, to "assess" at this time "the effect of its recent emphasis on this theme" seems premature, given that (i) GEF-8 projects and programs are now at the design stage, and (ii) the council paper on policy coherence and its associated workplan was only recently approved in October 2023. We do welcome and look forward to this IEO analysis, BUT we would like to emphasize that this needs to be done more with a forward-looking approach in terms of helping us to operationalize that workplan, rather than an evaluation of already-achieved actions, which may be sparse due to the very nature of that timeline.	
Key Questions	Key question #2 could be revised to explicitly make a distinction on whether policy coherence was an explicit or incidental objective of the project at the design stage. This distinction would make it clear that older projects are only suitable to a certain extent to be assessed for policy coherence.	No change. As noted above, the evaluation will use the term "policy coherence" using the broader scope outlined in the Conceptual Framework section. The focus will be on drawing insights from past GEF support to understand how these may be relevant in today's context.
Key Questions	It will be important to identify the specific GEF-funded interventions and/or activities the set of questions will address. For example, question 1. b could be paraphrased to, *"How have the outcomes of policy-related activities (e.g., advocacy, stakeholder engagement, policy briefs, etc) affected the overall outcomes of the project?"*	No change. Key Evaluation Question #1 aims to identify the types of GEF-funded interventions and/or activities supporting policy coherence, which are currently not systematically known. Table 1 provides a list of data and information sources.
Key questions *"In what ways have GEF activities contributed to sustained (or unsustained) policy coherence?"*	GEFSEC has not defined "sustained" or "unsustained" policy coherence. It would be helpful to have an explicit definition of this important criterion in this evaluation.	Definition added. See footnote on p.5
Conceptual Framework	This concept note defines policy coherence across four dimensions: horizontal, vertical, temporal, and political. However, the definition used by the GEFSEC on policy coherence aligns with the horizontal dimension only, which focuses on cross-sectoral and cross-ministerial	No change. Apart from the primary focus on horizontal coherence mentioned in the Scope and Limitations section, this section also states that "given the topic's

REFERENCE TEXT	COMMENTS	GEF IEO RESPONSE
	policy integration. The scope of this evaluation is, therefore, larger than the GEF's policy coherence mandate, as approved by the GEF Council in October 2023. While the concept note eventually mentions that the horizontal dimension will be the focus, while other types of policy coherence will be assessed, it will be good to mention this upfront. In addition, the paper does not explicitly explain the scope and definition adopted by GEFSEC and its difference from the conceptual framework as mentioned in this concept note. Please revise with the above-mentioned additions and caveats.

Relatedly, for consistency, the proposed evaluation questions could focus on the aspects outlined in the last paragraph of this section: i) capacity building, ii) enabling environments, iii) integration and synergies across sectors, and iv) operationalization of opportunities to enhance policy coherence. | broad scope and nuances, the evaluation's conceptual framework and working definitions of these terms will be further refined in dialogues with key stakeholders" (p.12). |
| *Methodological Approach* | It is appreciated that the evaluation clearly states its focus on "*Corporate activities identified in the GEF's 2023 strategy document,*" as this makes a good baseline to look back on what has happened and how future interventions will improve.

Nonetheless, as mentioned in previous comments, the methodology must be consistent with the fact that Policy Coherence and its elements have been approached differently in the previous cycles (GEF-6&7), and it is only from GEF-8 that the emphasis on "Policy Coherence" becomes pronounced and mainstreamed in GEF programming and strategies.

It is also important to have a clear sampling design. Several questions could be further clarified, such as: How many PFDs and PIFs will be screened? What is regional/country distribution? Which Focal Areas and IP distribution will be considered, and how? And How many projects will be visited and how were these projects selected? The concept note only lists Zimbabwe, Azerbaijan, and Georgia. | No change. See table 1 for populations (n) of PFDs and CEO-endorsed documents to be screened for the different portfolio reviews. Part of the evaluation process is narrowing down these populations to identify the number of projects and programs to be assessed in more detail.

The pre-identified case study countries were selected on an opportunistic/ synergistic basis given existing IEO missions. Other case studies will be identified as part of the evaluation process (portfolio reviews and Agency inputs). The paragraph on Field-based case studies (p.10) outlines key selection criteria. |

REFERENCE TEXT	COMMENTS	GEF IEO RESPONSE
To determine changes in the GEF's approach to policy support, GEF-8 activities will be primarily compared to those in GEF-6 and GEF-7, when its focus shifted to more integrated programming. Integrated programming, by its nature, requires coordination across multiple sectors and administrative scales to tackle drivers of environmental degradation; thus, this integrated focus will serve as a baseline for how the GEF has previously helped enhance policy coherence in countries.	We are only mid-way through GEF-8, and projects/programs are still being programmed, including some IPs for which projects have only recently been approved. Therefore, not all projects/programs for GEF-8 can be accurately covered by this evaluation to compare them to the GEF-6 and GEF-7 portfolios. Will the evaluation only cover the IPs or all projects? As it is only in GEF-8 IPs that Policy Coherence has been integrated as an explicit cross-cutting factor, including all GEF-8 projects and programs in the evaluation will not be an accurate representation of the evolution of policy coherence in GEF-8. Please consider revising/clarifying the scope of the evaluation.	No change. Part of the evaluation process is narrowing down the population of projects/ programs to identify which ones have policy-related dimensions to be assessed in more detail.
The evaluation will focus on corporate activities identified in the GEF's 2023 strategy document as areas for mainstreaming policy coherence…. Results-Based Management Framework, especially the Core Indicators.	It is not clear why the "Results-based Management Framework and the Core Indicators" is the focus of this evaluation. The Council Paper on Policy Coherence specifies that the *"Secretariat will consider the development and inclusion of a core indicator and/or subset of indicators on Policy Coherence, as a part of the <u>GEF-9 Results Measurement Framework</u>"*. Therefore, evaluating the Results Framework for GEF-8 with a focus on Policy Coherence seems premature and unfair. Please revise accordingly. Some core indicators, such as Biodiversity (1.2, 2.2), International Waters (7.2, 7.3), and Chemical and Waste (9.4, 10.1), specifically speak to legal/policy reform. Will this evaluation focus on these relevant core indicators, or will the entire suite of core indicators be considered? Please clarify.	No change. Key Evaluation Question #3 aims to systematically determine the extent to which GEF support is adapting to effectively promote policy coherence, not the extent to which it has already achieved its proposed targets. Both explicit and implicit/ indirect indicators of policy coherence will be considered to capture the breadth of GEF support for policy coherence.

REFERENCE TEXT	COMMENTS	GEF IEO RESPONSE
Competitive and Innovation Windows	The Innovation window is not dedicated to Policy Coherence, while the Competitive Window is. Evaluating both these windows with the same lenses is therefore inaccurate. Consider revising the methodological approach here.	No change. The October 2023 paper (p.9) states that "the thematic area of policy coherence is therefore a candidate for a subset of thematic programming within the GEF Innovations Window." Both explicit and indirect/ potential channels of policy coherence intervention will be considered to capture the breadth of GEF support for policy coherence.
The evaluation will focus on corporate activities identified in the GEF's 2023 strategy document as areas for mainstreaming policy coherence: • *Country Engagement Strategy, especially the National Dialogues* • *Knowledge Management & Learning Strategy* • *Competitive and Innovation Windows* • *Program and Project Screening* • *Results-Based Management Framework, especially the Core Indicators* *Features of these corporate strategies and processes will be compared to their precursors in GEF-6 and GEF-7 on how they deliberately enhance and track policy coherence within countries, and in relation to international institutions such as GEF Agencies and the Conventions.*	As stated in several earlier comments, assessing the GEF along these dimensions, which were approved at the 65th Council in October 2023, seems premature. These strategies and processes are only now being adapted to include elements of policy coherence, and some of them (such as core indicators) can only be adopted at the next replenishment. Therefore, "comparing" these dimensions to their GEF-6 and GEF-7 precursors will not yield much information. The IEO's proposed analyses, as outlined in this approach paper, can indeed be useful and relevant, but these need to be cast in a forward-looking mode and with the appropriate caveats made as to the timeline.	Emphasis added. See first paragraph of the Methodological Approach section (p.8) and last paragraph of the Scope and Limitations section (p.12). The evaluation timeline (table 2) has also been revised to allow more time for activities in the October 2023 paper to be implemented. One aim of the evaluation is to assess how the GEF's approach to cross-sectoral policy alignment has evolved from when policy coherence was not the focus, so as to gain insights on what was effective and not effective, and thus provide inputs to current and future GEF programming.
PFDs will also be assessed on their use of policy-related indicators, where relevant.	Please clarify which indicators will be used for the assessment. If GEF core indicators will be used, please note that the GEF-8 core indicators were not designed to measure policy coherence in projects/programs.	No change. These do not refer to core indicators. The results frameworks of PFDs will be reviewed for program-specific indicators that measure results

REFERENCE TEXT	COMMENTS	GEF IEO RESPONSE
	The GEF-8 project templates request an elaboration on the integration of policy coherence in the project description. It asks to "*Explain how this project will improve or develop national policies, including an improved alignment of existing policies (Policy coherence).*" This information in the templates will be systematically captured by the GEF Portal. This datapoint might be more appropriate to assess PFDs/PIFs rather than the core indicators, which were not intended to assess policy coherence. And even so, as per earlier comments, this template applies to GEF-8 projects only, therefore, this datapoint will not be available for earlier phases.	related to the programs' policy-related components. The evaluation will make sure to use the GEF Portal dataset based on the GEF-8 project templates.
"GEF-6 and GEF-7 integrated focus will serve as a baseline for how the GEF has previously helped enhance policy coherence in countries" *"A portfolio review of projects funded from GEF-6 and onwards will identify the types of policy coherence support the GEF has provided"*	It is not clear why projects funded from the earlier phases are not included. Projects funded during GEF-5 and earlier may very well serve as a better baseline because, in earlier phases, integration was not the primary focus. In addition, projects from GEF-6 and onwards are relatively "young" – with many not yet reaching the implementation stage, let alone the mid-term stage when agencies start reporting on outcomes. As the impact of policy coherence may take many years, it seems to be more logical to include projects from the earlier phases in the review. Consider revising the scope of the evaluation.	No change. As stated in the Methodological Approach section, "earlier projects will be assessed using specific criteria as appropriate" (p.8). The comparison between GEF phases will focus on the project/ program design (see table 1).
Scope and limitations	Regarding the key criteria mentioned here, it would be interesting to assess which *stakeholders* are most effective when engaged by the GEF in aligning incentives and objectives within the different government structures/agencies and affecting policy coherent outcomes.	No change. Key Evaluation Question #2b will identify contextual drivers and conditions that the GEF can leverage to support policy coherence, such as which stakeholders are most effective to engage.
Depending on the number of projects, the final portfolio for review may consist of samples that meet the identified criteria, to accommodate the evaluation's logistical constraints.	It is not clear what this means. Please clarify.	Revised. See corresponding sentence on p.12

REFERENCE TEXT	COMMENTS	GEF IEO RESPONSE
Table 2: Evaluation Timeline	Will there be a reference group for this Evaluation? If so, can the GEF Secretariat be a part of this reference group? As a general question, what determines whether or not an Evaluation will have a reference group? The timeline refers to two field visits. Would the GEF Secretariat be able to join these field visits in order to enhance our own first-hand knowledge and learning on policy coherence? We can establish some clear lines to ensure that we do not impact the IEO's data collection process. The IEO has joined the GEF's field visits in the past, so there is precedence.	No change. The evaluation is holding separate focus group discussions with key stakeholder groups soliciting both feedback on the evaluation design (e.g. on the concept note) and milestones (e.g. draft evaluation report), as well as insights and data on relevant experiences. Stakeholder engagement in evaluations takes place through different mechanisms. The Reference Group is only one of these. Evaluations engage key stakeholders, whether individually or in group format, based on timing, availability and other factors. The GEF IEO may accommodate GEFSEC staff on an evaluation mission to foster learning and knowledge.