



1. Project Data

Project ID P130474	Project Name BZ Mgmt and Protection of KBAs	
Country Belize	Practice Area(Lead) Environment, Natural Resources & the Blue Economy	
L/C/TF Number(s) TF-16773	Closing Date (Original) 30-Sep-2019	Total Project Cost (USD) 3,558,939.27
Bank Approval Date 29-Sep-2014	Closing Date (Actual) 30-Sep-2019	
	IBRD/IDA (USD)	Grants (USD)
Original Commitment	6,085,600.00	6,085,600.00
Revised Commitment	6,085,600.00	6,085,600.00
Actual	3,558,939.27	3,558,939.27

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2. Project Objectives and Components

a. Objectives

According to the Project Appraisal Document (PAD) (p. vii) and the Global Financing Facility Agreement of May 11, 2014 (p. 6) the objective of the project was "to strengthen natural resource management and biodiversity conservation in Key Biodiversity Areas (KBAs) of Belize".

b. Were the project objectives/key associated outcome targets revised during implementation?



No

c. Will a split evaluation be undertaken?

No

d. Components

The project included four components:

Component 1: Supporting Forest Protection and Sustainable Forest Management Activities in Key Biodiversity Areas (appraisal estimate US\$2.18 million, actual US\$ 0.85 million): This component was to finance the support of forest protection and sustainable forest management (SFM) to contribute to a reduction of emissions from deforestation and degradation and increase in sequestration of CO₂. Forest protection activities that were supported included: review of Belize's land tenure legislation, training to promote an Reducing Emissions from Deforestation and Degradation (REDD+) program, and development and establishment of a fire incidence rapid response team. Activities to support sustainable forest management included rehabilitation of critical areas of high conservation value, incorporation of climate change mitigation and resilience measures through community-based sub-projects, implementation of community sub-projects for sustainable harvesting and marketing of non-timber forest products, awareness raising for SFM and development and implementation of SFM plans including establishing a forest information system (FIS).

Component 2: Promoting Effective Management of Key Biodiversity Areas (appraisal estimate US\$2.59 million, actual US\$1.45 million): This component financed two sub-components:

Sub-component 2.1: improving management of Key Biodiversity Areas (KBA): This sub-component was to finance activities such as the development of procedures, guidelines, criteria and regulations for the declaration, re-alignment and re-reservation of Protected Areas (PAs).

Sub-component 2.2: Monitoring and compliance of PAs: This sub-component was to support activities such as reviewing the legal framework for the protection of biodiversity and forests, monitoring and compliance support for PAs, and development of a biodiversity monitoring system for KBAs.

Component 3: Institutional Strengthening and Capacity Building for Enhanced Enforcement of Environmental Regulations (appraisal estimate US\$1.0 million, actual US\$0.85 million): This component financed two sub-components:

Sub-component 3.1: Increased coordination for balancing environmental management and development: This sub-component focused on improving the Environmental Impact Assessment (EIA) process and strengthening compliance monitoring capacity of staff in the department of the environment of the ministry of forestry, fishery, and sustainable development (MFFSD) and other key agencies.

Sub-component 3.2: Strengthening and improving environmental screening tools and processes: This sub-component was to support the development of a departmental committee for the promotion of a balance between environmental management and development needs and support the establishment of a standardized environmental impact assessment (EIA) program and protocols for an enhanced environmental screening and scoping.



Component 4: Project Management, Monitoring and Assessment (appraisal estimate US\$0.31 million, actual US\$0.40 million): This component was to finance the operating costs of project management by the Project Implementing Agency Group (PIAG) based within the Ministry of Forestry, Fisheries and Sustainable Development (MFFSD). Activities included under this component were to be project coordination, supervision, monitoring and evaluation, quality control, socio-environmental management, reporting and fiduciary management.

e. Comments on Project Cost, Financing, Borrower Contribution, and Dates

Project Cost: The project was estimated to cost US\$9.08 million, actual cost was US\$6.22 million.

Financing: The project was financed by a US\$6.09 million Trust Fund Grant by the Global Environment Facility of which US\$3.56 million was disbursed (see Sections 8b and 10b for details).

Borrower Contribution: The Borrower was to contribute US\$3.0 million. Actual contribution was US\$2.66 million.

Dates: On November 2, 2017 the project was restructured to: i) amend part 4 of “project management, monitoring and assessment” to include resettlement expenditures; ii) add a definition for resettlement expenditures to be financed under the project; and iii) change the cost of the respective components.

3. Relevance of Objectives

Rationale

According to the PAD (p. 2) Belize has a high level of terrestrial and aquatic biodiversity which includes more than 150 species of mammals, 540 species of birds, 151 species of amphibians and reptiles, nearly 600 species of freshwater and marine fishes, high numbers of invertebrates, and 3,408 species of vascular plants. Also, Belize has two large intact virgin forests, which are protected by 103 protected areas (PAs) covering 35.8 percent of the country’s total land area.

While Belize was able to manage the preservation of its existing forests and outstanding biodiversity to a great extent, the country still faced several growing challenges. Agricultural expansion, housing, tourism, illegal logging, hunting and poaching resulted in a decrease in the size of the forest cover by approximately 9,416 hectares per year between 1980 and 2010 and was predicted to continue to decrease. According to the ICR (p. 1) between 2010 and 2012, natural disasters such as wildfires and hurricanes damaged approximately 33,129 hectares of forest and 25,092 hectares suffered from land clearing. Also, climate change related events such as intense and frequent tropical storms and hurricanes, floods and rising sea levels resulted in an additional risk to the natural ecosystems. Therefore, Key Biodiversity Areas (priority areas for biodiversity protection focusing on the presence of globally threatened species) needed to be protected.

According to the PAD (p. 3) Belize is a signatory to the 1993 Convention on Biological Diversity (CBD). At the time of project appraisal, the objective of the project was fully aligned with Belize’s National Biodiversity Strategy and Action Plan (NBSAP) submitted to the CBD, which aimed to promote the comprehensive use



and management of Belize’s biological resources. Also, the objective of the project supported the 2005 National Protected Areas System Plan (NPASP), which targeted the enhanced management of PAs and fulfilling Belize’s commitments to the CBD Program of Work on Protected Areas. Finally, the objective was also aligned with Belize’s long-term development plan “Horizon 2030” which highlighted the central role of sustainable environment and natural resource management in the Belizean economy.

According to the Bank team (April 9, 2020), while the project design included some activities that were to support government policies such as the development of instruction notes for wildlife management legislation or the Forest Act revision, these activities were either dropped due to delays or did not result in the adoption of government policy. Therefore, the project did not support any recent government policies.

Finally, the objective of the project was in line with the Bank’s most recent Country Partnership Framework (CPF) (FY18-22) which emphasizes the importance of Belize’s natural resource base, especially the benefits from extensive areas of pristine tropical forests, vital to limiting soil erosion and runoffs, as well as providing communities with livelihood opportunities. The objective of the project also supported Belize’s international commitments, especially on climate change, as outlined in its Nationally Determined Contribution (NDC) under the Paris Agreement and its sectoral priority on sustainable forest management.

Given that the project did not support any relevant recent government policies at the time of closing, the relevance of objective is rated Substantial.

Rating

Substantial

4. Achievement of Objectives (Efficacy)

OBJECTIVE 1

Objective

To strengthen natural resource management in Key Biodiversity Areas (KBAs) of Belize:

Rationale

The project’s theory of change envisioned that project outputs such as reviewing land tenure legislation and identifying improvements, providing training to promote a Reducing Emissions from Deforestation and Forest Degradation (REDD)+ program, establishing a fire incidence rapid response team and providing it with equipment and training as well as completing sub-projects for rehabilitation of critical areas and sustainable forest management plans developed and implemented were to result in the project outcomes specified below, which in turn were to result in the overall outcome of strengthening natural resource management. According to the ICR (p. 2) the areas of interventions were selected based on prioritization and criteria related to biodiversity, climate change, and sustainable forest management. Target areas were selected out of 32 terrestrial PAs within KBAs following a deliberate and consultative process and covered 215,729 hectares. The ICR did not state if any assumptions were made.



Outputs:

- 16,366 hectares of forest area were brought under management plans, not achieving the target of 106,557 hectares.
- A fire incidence rapid response team (FIRRT) was developed and established and a work plan for the community fire brigade was prepared. Also, equipment such as protective clothing, mobile water tanks, water pumps and hoses were procured. 136 people were trained and equipped in enforcement and forest fire reduction techniques, surpassing the target of 50 people being trained.
- An awareness raising program on Sustainable Forest Management and forest fire prevention was developed and implemented.
- A Forest Information System (FIS) for data and information on forests, wildlife, and PAs were developed. The system connected all FD offices and was piloted for one year. However, there was uncertainty about funding after project closure.
- Permanent Sample Plots (PSPs) in different forest types and ecosystems and existing PSPs contributed to the collection of data on carbon and traditional parameters such as tree mortality, regeneration, litter).
- An “assessment of the KBAs to identify priority rehabilitation and resilience opportunities for community-based sub-projects”.
- An “assessment of the KBAs to identify opportunities for sustainable harvesting and marketing of non-timber forest products and other community-based forestry initiatives” which identified Non-Timber Forest Products (NTFPs) with commercial value.
- A one-year operational plan (2018-2019) was developed (not implemented) to promote conservation and the sustainable use of NTFPs within the KBA focusing on pilot projects to develop agroforestry or multi-cropping systems, plantations and processing plants for NTFPs and animal husbandry.
- Seven government institutions (the Forest Department (FD), Belize Defense Force, Police, and the Department of the Environment (DOE)) were provided with capacity building support to improve management and compliance monitoring of forest resources and environment, surpassing the target of four government institutions. The project supported the DOE in developing a National Water Quality Monitoring Program and Protocol and contributed to updating the National Water Quality Monitoring Plan. The project also completed an assessment of the existing environmental clearance process (ECP) of the DOE, which contributed to the amendment of the Environmental Clearance Regulation Act in August 2017. Also, an analysis of information management needs was conducted and an Environmental Information System (EIS) for the DOE to improve capacity for decision making in the Environmental Impact Assessment (EIA) process was implemented. The EIA program was revised and the EIA manual was updated and endorsed, achieving the target of doing so.
- Reforms in forest policy, legislation or other regulations were not supported, not achieving the target of doing so.
- One forest management plan was developed and implemented in targeted forests, not achieving the target of four plans.
- 25 staff in government institutions were provided with training to better equip them with monitoring and compliance skills, surpassing the target of 20 staff.

Outcomes:

- The project did not conduct the planned baseline survey and periodic surveys to measure the PDO indicator on “people in targeted forests and adjacent communities with increased monetary or non-



monetary benefits from forests”. Also, no sub-projects were implemented, not achieving the target of 3,425 hectares of area being restored or re/afforested.

- The indicator of 50 men and women engaged in sub-projects supporting sustainable harvesting and marketing of NTFPs in target areas was not achieved since no sub-projects were implemented.
- The indicator of 2.5 million metric tons of CO₂e reduction due to avoided emissions and/or increased sequestration was not achieved since on the ground verification of the 10 new PSPs were pending at the time of project closure.

Rating

Negligible

OBJECTIVE 2

Objective

To strengthen biodiversity conservation in Key Biodiversity Areas (KBAs) of Belize:

Rationale

The project’s theory of change envisioned that the project’s outputs such as developing procedures, guidelines, criteria for PA management, updating the National Protected Areas System Plan, reviewing the legal framework for biodiversity and forests, implementing compliance and monitoring systems for PAs, and developing and establishing biodiversity systems for KBAs were to result in project outcomes (see below), which in turn were to result in the overall outcome of strengthening biodiversity conservation.

Outputs:

- A management plan for the Spanish Creek Wildlife Sanctuary (SCWS), a national park, for the period 2016-2021 was developed, not achieving the target of six management plans. The plan was based on multiple consultations with local communities and NGOs. Boundaries of SWCS were demarcated and maps were developed and delivered. According to the Bank team (April 9, 2020) this activity aimed to lay survey lines for specific sections of the boundaries of the SCWS, place survey marks at all appropriate locations, and produce an authenticated survey plan of the boundaries of the Spanish Creek Wildlife Sanctuary.
- Clear procedures and criteria for the declaration, re-alignment and de-reservation of PAs were not established, not achieving the target of doing so.
- The 2005 National Protected Areas System Plan (NPASP) was not updated to incorporate climate change mitigation and resilience measures, not achieving the target of doing so.

Outcomes:

- 20.8 hectares were brought under enhanced biodiversity protection in the targeted KBAs, not achieving the target of 60 hectares.



- The target of increasing the sightings of target indicator species by 20 percent was not achieved. This indicator also lacked a baseline which would have made it challenging to measure an increase.

Rating
 Negligible

OVERALL EFFICACY

Rationale

The achievement of both objectives was Negligible.

Overall Efficacy Rating
 Negligible

Primary Reason
 Low achievement

5. Efficiency

Economic efficiency:

The PAD (p. 46) included an Economic analysis. The PAD identified the benefits as decreased deforestation and illegal wildlife harvesting through reduced illegal trespass for hunting or land clearing, protection of KBA forest resources through fire protection, and restoration of degraded sites through reforestation. A cost effectiveness analysis was conducted to estimate what Belize would have had to spend in order to achieve the same protection as the project. It was assumed that Belize would have to purchase credits for deforestation that was to occur without the project (a total of 12,430 hectares for the 10-year time horizon, and 24,858 hectares for the 20-year time horizon. Taking the conservative mid-range of these values from the analysis, it was assumed that Belize would need to spend US\$1,000 per hectare to offset the damage from not implementing the project. Using this figure, and assuming that the cost was paid at year zero, the total costs from this alternative action were to be US\$12.4 million for the 10-year time horizon, and US\$24.8 million for the 20-year time horizon versus the project cost of US\$6.08 million.

However, project calculations were unrealistic. The project was to bring 106,557 hectares of land under management plans. However, the ICR (p. 12) stated that a study had shown that the financial needs for managing protected areas in the Latin America and Caribbean region were at US\$3.54/hectare-year, 30 percent more than the total financing for this component.

The ICR (p. 12) stated that it was not possible to conduct an Economic analysis after project closing due to project implementation limitations, country conditions, and substantial data constraints.

Operational efficiency:



The project only disbursed US\$3.55 million instead of the appraised US\$6.09 million. While the project management costs were estimated at US\$0.31 million (five percent of total project financing), they ended up being US\$0.4 million (11 percent of total project financing). The ICR (p. 12) stated that these costs were comparable to other community-driven projects. However, the objectives of this project and the implementation of community-based sub-projects were not achieved but project management costs were higher than at appraisal. This might indicate an inefficient use of the project’s resources.

Taking into account these findings, the Efficiency of the project is rated Negligible.

Efficiency Rating

Negligible

a. If available, enter the Economic Rate of Return (ERR) and/or Financial Rate of Return (FRR) at appraisal and the re-estimated value at evaluation:

	Rate Available?	Point value (%)	*Coverage/Scope (%)
Appraisal		0	0 <input type="checkbox"/> Not Applicable
ICR Estimate		0	0 <input type="checkbox"/> Not Applicable

* Refers to percent of total project cost for which ERR/FRR was calculated.

6. Outcome

Relevance of the objective was Substantial given that the project did not support any recent government policy at the time of closing. Efficacy and Efficiency were rated Negligible resulting in an overall outcome rating of Highly Unsatisfactory.

a. Outcome Rating

Highly Unsatisfactory

7. Risk to Development Outcome

The project outcomes face several risks broadly outlined in three categories:

Political: According to the ICR (p. 15) the contribution and overall commitment from technical departments was limited. However, the ICR (p. 21) stated that the government is committed to the achievement of the objectives of the project as demonstrated by its engagement in the on-going Marine Conservation and Climate Adaptation project (which aims to implement priority ecosystem-based marine conservation and



climate adaptation measures) and the REDD+ project (which aims to assist Belize in strengthening its capacity to participate in future REDD+ carbon payment transactions).

Technical: The project experienced several shortcomings due to limited technical capacity. According to the ICR (p. 21) the project strengthened technical capacity through procuring monitoring equipment, and conducting assessments to identify opportunities for community-based livelihoods sub-projects. However, more capacity building will be required to ensure the sustainability of the capacity already built. Also, the ICR (p. 21) stated that currently another Bank project (the FCPF REDD Readiness project) was implementing project activities such as providing training on REDD+ and carbon estimation to the FD. However, further institutional strengthening of the FD, DOE, Pact and other relevant institutions will be critical.

Legislative: According to the ICR (p. 21) Belize continues to encounter political challenges in regards to examining existing requirements for land clearing within the legal structure. Until the land tenure system, legislation and actual registration of boundaries will be clarified and indigenous communities will be re-engaged with to ensure the sustainability of results, but managing and supervising of management plans will remain challenging.

8. Assessment of Bank Performance

a. Quality-at-Entry

According to the ICR (p. 20) the objective of the project was strategically relevant for the country and based on sound ecological analysis and stakeholder consultation. For example, the ICR (p. 14) stated that the selection criteria for project sites were collaboratively agreed on between the Forest Department (FD), the National Protected Areas Policy Secretariat (NPAS) and the Project Steering Committee (PSC).

However, the ICR (p. 13) stated that the project's objective was highly ambitious given the limited institutional capacity of the government. Also, the project's design was overly complex and included a wide scope of activities such as sustainable forest management, biodiversity, ecosystem services, PA management, environmental policy, community-based development, small business development and several others. Also, project preparation was lengthy and took over 28 months. While the ICR (p. 20) stated that the Bank team had the adequate skills for project preparation, it would have benefited from forestry expertise to ensure effective forest fire activities.

According to the ICR (p. 14), the Bank team identified relevant risk factors. However, all risks were underestimated and mitigation measures were inadequate. Only the risk that the proposed development of management plans for the targeted PAs might inadvertently affect the security of Mayan communities' led tenure was rated High. Other risks, such as community-based activities taking time for implementation to start due to insufficient capacity, which was rated as moderate in the PAD, was underestimated. Also, the ICR (p. 14) stated that risks related to implementation arrangements such as the decision-making process including the PSC and Technical Advisory Committee (TAC) was not identified and resulted in implementation delays. Furthermore, the risk of weak government commitment and delays due to the ministerial change following the general election in 2015 were not identified as risks. Finally, the Bank team did not identify the risk from illegal, activities in national parks, which resulted in the CNP to be excluded from project areas. (According to the Bank team (April 9, 2020) in July



2018, it came to the Bank's attention that an Environmental Impact Assessment was developed for an underground gold mining activity in Chiquibul National Park (CNP) with a view to securing an approval for proceeding with the mining phase of the proposed activity. The Bank felt that the proposed mining activity in such an area was not consistent with the development objective of the project. Therefore, clarification was sought with respect to permitting mineral exploitation activities in the CNP, including its legality and potential conflict with the preservation of the park. Due to delays in the clarification process the government informed the Bank in December 2018 that the CNP will be removed from the project sites.)

The ICR (p. 14) stated that the project received a Project Preparation Grant in the amount of US\$120,000. However, grant activities advanced slowly and some planned activities such as technical studies to establish baselines were not fully achieved since the line departments' commitment and knowledge and experience related to the establishment of the new Ministry of Forestry, Fisheries, and Sustainable Development was limited.

Also, according to the ICR (p. 12) cost estimations for the project were off. The project aimed to bring 106,557 hectares of land under management plans but only achieved 15 percent of this target. Achieving the target would have required financing in the amount of US\$1.89 million, more than 30 percent of the total appraisal budget for this component.

The project's Results Framework had several shortcomings. For example, the targets of some PDO indicators were overly ambitious and difficult to measure (see section 9a for more details).

Quality-at-Entry Rating

Unsatisfactory

b. Quality of supervision

According to the ICR (p. 20) the Bank conducted nine supervision missions and several field visits throughout project implementation to assess implementation progress and bottlenecks. During the initial phase of project implementation the Bank provided financial management support to ensure that the project's Interim Financial Reports (IFRs) complied with the Bank's regulations. The ICR (p. 20) stated that the Bank's response to the fire incident was adequate (see section 10b for more details). However, reporting on the overall implementation progress was overly optimistic and remained satisfactory despite limited disbursement and progress towards the targets during the initial years of project implementation. Only in June 2016, when only 16 percent of the financing was disbursed was the rating downgraded to moderately satisfactory.

The ICR (p. 21) stated that the Mid-Term Review was only conducted during the fourth year of project implementation when the project faced several implementation challenges. After the Mid-Term Review it was decided to close the project and the Bank team developed an action plan to prioritize the completion of activities, which would maximize achievements.

Quality of Supervision Rating



Moderately Unsatisfactory

Overall Bank Performance Rating

Unsatisfactory

9. M&E Design, Implementation, & Utilization

a. M&E Design

The project's objective was clearly specified. The PDO and intermediate outcome indicators encompassed all outcomes of the PDO statement and the project's theory of change and how key activities were to lead to the intended outcomes was adequate.

However, all PDO indicators and the majority of intermediate outcome indicators did not have a baseline. Also, several indicators measured two different aspects such as intermediate outcome indicator 5 "men and women engaged in sub-projects supporting sustainable harvesting and marketing of NTFPs in target areas", or PDO indicator 2 "people in forest & adjacent community with monetary/non-monetary benefit from forest". Furthermore, PDO indicator 3 "government institutions provided with capacity building to improve management of forest resources" was also stated in the Results Framework as an intermediate outcome indicator. However, the two indicators measured different outcomes. While the PDO indicator measured number of institutions, the intermediate outcome indicator measured number of staff. Finally, several indicators were not sufficiently concise and focused on outputs rather than outcomes such as intermediate outcome indicator 3 and intermediate outcome indicator 8 "forest management plans developed and implemented in targeted forests" and indicator 3 "PA management plans developed and implemented in targeted areas".

The Ministry of Forestry, Fisheries and Sustainable Development (MFFSD) was to be responsible for the overall monitoring and evaluation (M&E) through the Project Implementing Agency Group (PIAG).

b. M&E Implementation

According to the ICR (p. 17) due to the Project Implementing Agency Group's (PIAG's) limited experience in implementing Bank projects and conducting M&E activities, the project experienced shortcomings in M&E reporting, analysis, data collection, and measuring of PDO indicators. The ICR stated that until November 2015 (when the elections took place) the PIAG collected data for progress reports.

After the election, due to focus being moved elsewhere, and limited capacity in project management, quarterly reports were delayed and M&E reporting only happened on an occasional basis. According to the ICR (p. 17) the Bank did not recognize these shortcomings until the Mid-Term Review in April 2018 (the fourth year of project implementation). Following the Mid-Term Review, an international biodiversity-monitoring specialist was hired to support the implementation of biodiversity conservation activities. Also, during the Mid-Term Review, the Bank attempted to modify the indicators and targets to align them with the adjusted project activities. However, according to the ICR (p. 17) mining related safeguard issues were addressed first and the project was not restructured to modify the Results Framework. The ICR stated that the PIAD used the modified Results Framework for monitoring until the project closed.



c. M&E Utilization

1. According to the ICR (p. 18) the project did not use M&E data to support project management or to inform decision-making. For example, the Implementation Status Reports did not report any M&E data during the first year of implementation and the M&E rating remained Satisfactory until June 2016 despite obvious M&E shortcomings. Even though the Mid-Term Review in April 2018 identified these shortcomings, the M&E rating was Moderately Satisfactory and was only downgraded to Moderately Unsatisfactory in November 2018.

M&E Quality Rating

Negligible

10. Other Issues

a. Safeguards

The project was classified as category B and triggered the Bank's safeguard policies OP/BP 4.01 (Environmental Assessment), OP/BP 4.04 (Natural Habitats), OP/BP 4.36 (Forests), OP/BP 4.09 (Pest Management), OP/BP 4.11 (Physical and Cultural Resources), OP/BP 4.10 (Indigenous people), OP/BP 4.12 (Involuntary Resettlement) and OP/BP 7.60 (Projects under Disputed Areas). The project prepared an Indigenous Peoples Framework, an Involuntary Resettlement Policy Framework, and a Livelihood Restoration Process Framework.

According to the ICR (p. 18) overall safeguard compliance was Moderately Satisfactory throughout project implementation except for a period in 2017 when safeguard compliance was downgraded to Unsatisfactory due to lack of compliance with the project's Involuntary Resettlement Policy Framework following the fire incident that occurred in the Columbia River Forest Reserve (CRFR) in mid-February 2017. According to the ICR (p. 6), the government accidentally burned down active crops and huts of two Maya families as part of a security operation. The ICR stated that the incident was brought to the Bank's attention in April 2017 and the Bank determined that resettlement compensation was required, which was in line with the project's safeguards instruments. A Resettlement Audit and Action Plan (RAAP) was prepared by the government, which complied with the project's Involuntary Resettlement Policy Framework (IRPF). The IRPF was consulted with the affected farmer families and the community leaders and the Bank approved the resettlement compensation.

Also, the ICR (p. 18) stated that the project conducted an Environmental and Social Safeguards workshop with discussions on a long-term engagement with Maya implementation of social safeguards and the RAAP.

b. Fiduciary Compliance



Financial Management:

According to the ICR (p. 19), by December 2016 Protected Areas Conservation Trust (PACT) had a financial management system in place. However, the project continued to face issues regarding an adequate establishment of the project’s chart of accounts, adequate reviews and approvals of transactions posted to project accounts and delays in addressing differences between the expenditure records of PACT and the Bank. PACT and the Bank developed an action plan to address these issues. The following financial management supervision missions confirmed that the action plan’s recommendations were addressed by PACT adequately. The ICR (p. 19) stated that the project submitted all outstanding Interim Financial Reports (IFRs) and the project’s external auditor provided an unmodified opinion on the project’s final audit.

The ICR (p. 19) stated that except during the initial phase between approval and November 2015 when the Financial Management ratings were Satisfactory, and between December 2016 and November 2017 when the ratings were Moderately Unsatisfactory, the project’s Financial Management ratings were Moderately Satisfactory. The rating of Moderately Unsatisfactory was due to delayed and inaccurately prepared Interim Financial Reports (IFRs) and lack of compliance with the Bank’s requirements.

Procurement:

According to the ICR (p. 19) the project implemented the procurement processes according to the Bank’s guidelines. The Protected Areas Conservation Trust (PACT) hired a dedicated procurement officer in August 2014 who was responsible for preparing and implementing the procurement plan. However, due to the limited experience of PACT and the Project Implementation Agency Group (PIAG) the project experienced challenges in processing and managing contracts. Also, the project encountered low numbers of bidders and consultants in some selection processes, which resulted in implementation delays.

According to the ICR (p. 19) in June 2019, the last post review was conducted which found that activities complied with the Bank’s procurement guidelines as well as the project’s legal agreement. Until June 2016 the project’s procurement rating was Satisfactory, then it remained at Moderately Satisfactory until project closing.

c. Unintended impacts (Positive or Negative)

NA

d. Other

11. Ratings

Ratings	ICR	IEG	Reason for Disagreements/Comment
Outcome	Highly Unsatisfactory	Highly Unsatisfactory	



Bank Performance	Moderately Unsatisfactory	Unsatisfactory	Unsatisfactory Quality at entry and Moderately Unsatisfactory for Supervision.
Quality of M&E	Negligible	Negligible	
Quality of ICR	---	Substantial	

12. Lessons

The ICR (p. 22-23) included several lessons learned:

- **Building and sustaining government ownership at all levels is critical for a timely delivery of project results and outcomes.** In this project, technical contributions from the technical departments was limited and commitment to monitoring, reporting and coordination among implementing agencies was weak and had a negative impact on project implementation.
- **The complexity of a project needs to match the local technical capacity and level of financing.** In this project design was complex, partly as a result, the Bank was not able to build sufficient local capacity due to financial constraints in regards to project management.
- **Engaging with local communities is critical to ensure positive outcomes and their sustainability.** In this project, some stakeholders such as co-mangers of PAs in the KBAs were not aware of the project and were therefore unwilling to participate in the assessment of priority rehabilitation and resilience opportunities.

13. Assessment Recommended?

No

14. Comments on Quality of ICR

The ICR provided a good overview of project preparation and implementation. The ICR is concise and appropriately candid. Also, it included useful lessons learned. The ICR did not include an Economic analysis due to the lack of data. Overall, the quality of the ICR is rated Substantial.

- a. **Quality of ICR Rating**
 Substantial

