



## 1. Project Data

<b>Project ID</b> P131138	<b>Project Name</b> ENPI East Countries FLEG II Program
<b>Country</b> Europe and Central Asia	<b>Practice Area(Lead)</b> Environment & Natural Resources

<b>L/C/TF Number(s)</b> TF-13973,TF-14063	<b>Closing Date (Original)</b> 31-Dec-2016	<b>Total Project Cost (USD)</b> 11,104,290.00
<b>Bank Approval Date</b> 24-Jan-2013	<b>Closing Date (Actual)</b> 31-Dec-2016	
	<b>IBRD/IDA (USD)</b>	<b>Grants (USD)</b>
Original Commitment	6,352,564.00	6,352,564.00
Revised Commitment	6,352,564.00	6,352,564.00
Actual	6,352,564.00	6,352,564.00

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## 2. Project Objectives and Components

### a. Objectives

The project development objective was “to support the seven Participating Countries to strengthen forest governance through improving implementation of relevant international processes; enhancing their forest policy, legislation and institutional arrangements; and developing, testing and evaluating sustainable forest management models at the local level on a pilot basis for future replication” (Grant Agreement).

The statement of the objective in the project appraisal document (PAD) is almost identical; it does not specify the number of participating countries. It however points to the specific development objectives, as follows:  
i) make progress implementing the 2005 St. Petersburg FLEG Ministerial Declaration (see Section 3a for



definitions) in the participating countries and support the participating countries commit to a time-bound action plan to ensure its implementation and follow-up activities (regional level);  
ii) review or revise (or establish a time-bound action plan to review or revise) forest sector policies and legal and administrative structures; improve knowledge of and support for sustainable forest management and good forest governance (including the impact of related EU regulations) in the participating countries (national level);  
iii) test and demonstrate best practices for sustainable forest management and the feasibility of improved forest governance practices at the field-level on a pilot basis in all participating countries (sub-national level).

IEG uses the statement of objectives from the legal document to assess the project achievements.

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

Yes

**Did the Board approve the revised objectives/key associated outcome targets?**

No

**c. Will a split evaluation be undertaken?**

No

**d. Components**

**1: Regional Program** (appraisal US\$ 1.33 million; n/a in the ICR) included the following activities: i) strengthening the policy dialogue between participating countries and institutions regarding the 2005 SPD; ii) monitoring the implementation of the SPD in participating countries; iii) conducting regional studies and developing publications; iv) providing regional support to the implementation of the FLEG country work plans; v) developing a communications strategy; vi) contributing to communication activities to promote regional and national activities; vii) maintaining a high-quality Internet site; viii) regional coordination of this Program through annual meetings of focal points (country representatives) under phase 1 of the European Neighborhood and Partnership Instrument (ENPI) FLEG Program, donors and implementing organizations.

**2: National and Sub-National Program** (appraisal US\$ 8.25 million, n/a in the ICR) included the following activities: *National level:* i) Supporting, continuation from Phase I, the formulation and implementation of forest policy, legal, administrative and institutional reforms; ii) promoting a good investment climate; iii) providing capacity building, training and advice on administrative/institutional reforms; iv) liaising and co-operating with forest sector experts from EU member states, vii) formulating national work plans and ensuring compliance with safeguards. *Sub-national and Local Program level:* i) providing support on forest governance techniques to enable forest staff to ensure law enforcement, ii) documenting and communicating concrete local results; iii) supporting the use of modern technology; iv) involving local communities in policy development and in sustainable forest management; v) increasing public awareness and participation.

**3: Program Management** (appraisal US\$ 1.40 million; n/a in the ICR) included the following activities: i)



overall management of the Program; ii) ensuring compliance with World Bank and EU safeguard policies and directives; iii) quality control; iv) Program reporting and monitoring v) organizing joint meetings for focal points and other Program-level coordination events exchange of information between the participating countries and planning and coordination of national work plans.

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

*Project Cost.* The total project cost was US\$10.9 million equivalent, as compared to the appraised US\$11.2 million equivalent.

*Financing.* The project was financed by a European Union grant in the amount of € 9.0 million (US\$11.21million). It was jointly implemented by three implementing organizations (IOs): The World Bank, and the international non-governmental organizations- the Worldwide Fund for Nature (WWF) and the International Union for Conservation of Nature (IUCN). The Bank was the main recipient acting as administrator of grant funds provided by the European Community; and the other IOs were sub-grantees. Starting in 2013, the Austrian Development Agency (ADA) provided parallel financing to complement project activities in Armenia and Georgia through the “ENPI East Countries FLEG II Program– Complementary Measures for Georgia and Armenia” (P147833).

*Recipient contribution.* No recipient contribution was planned nor received.

*Dates.* The project closed as originally scheduled on December 31, 2016. It was restructured once to introduce changes into the results framework, per donor (EU) request.

### 3. Relevance of Objectives & Design

**a. Relevance of Objectives**

This FLEG II Program was designed and implemented in the context of three key initiatives: i) the St. Petersburg Declaration (SPD); ii) the European Union's Forest Law Enforcement Governance and Trade (FLEGT) Action Plan and, to a lesser extent, with iii) FOREST EUROPE (a pan-European policy process for the sustainable management of the continent's forests). The SPD was the result of the November 2005 Europe and North Asia Ministerial Conference on Forest Law Enforcement and Governance, where 44 governments committed to take action to address illegal logging and associated forest crimes. The declaration included a list of 22 indicative actions. The FLEGT Action Plan (endorsed in November 2003) covered supply and demand side measures to address illegal logging. It led to two key pieces of legislation: i) FLEGT Regulation (2005) allowing for control of entry of timber to EU from countries with bilateral FLEGT Voluntary Partnership Agreements (VPA); and ii) EU Timber Regulation, adopted by the European Parliament (2013).

The Program was aligned with the World Bank's ECA Regional Strategy on closer cooperation with the EU, including the EU Member States. The objectives were aligned with the related World Bank strategies, such



as Environment and Forest Strategies and the Roadmap for Environment and Natural Resource Law Enforcement. The objectives were also aligned with IUCN and WWF programs, complementing IUCN’s “One Program” approach linking its natural resource management problems, and embedded in WWF’s 5-year strategic plans.

to support the seven Participating Countries to strengthen forest governance through improving implementation of relevant international processes; enhancing their forest policy, legislation and institutional arrangements; and developing, testing and evaluating sustainable forest management models at the local level on a pilot basis for future replication

A significant shortcoming of the project is the undefined nature of the objective's reference to "support" and "governance" and all that this entails. In this instance, the ambition of the objective is too closely aligned to outputs rather than to outcomes, thus deriving scant evidence on the expected transformational affect of the project. While there is an inferred reference to governance being applied to forest models where the project seeks to pilot new approaches, this is vague and not easily applied to the components of the project. Thus, while the project's PDO is relevant to the needs of the countries, it does not sufficiently respond to this need in its formulation. Hence, the rating for relevance is Modest.

**Rating**

Modest

**Revised Rating**

Not Rated/Not Applicable

**b. Relevance of Design**

This technical assistance project focused on capacity building for improving forest governance in the seven countries of the European Union’s (EU’s) European Neighborhood and Partnership Instrument (ENPI) East region: Armenia, Azerbaijan, Belarus, Georgia, Moldova, Ukraine, and the Russian Federation. It was the second phase of the ENPI-FLEG Program in partnership between the EU and the World Bank Phase I, which was implemented from 2008-2012 in collaboration with IUCN and WWF (P111139).

The project had technical activities in seven participating countries- Armenia, Azerbaijan, Belarus, Georgia, Moldova, Ukraine, and the Russian Federation. Technical support and activities were aimed at improving implementation of relevant international processes; enhancing their forest policy, legislation and institutional arrangements; and developing, testing and evaluating sustainable forest management models at the local level on a pilot basis for future replication. There were clear logical linkages between the technical assistance activities and these sub-objectives, which could contribute to the overarching objective of strengthening forest governance. The strengthened forest governance was, however, not defined at the outcome level.

**Rating**

Modest

**Revised Rating**

Not Rated/Not Applicable

**4. Achievement of Objectives (Efficacy)**



## **Objective 1**

### **Objective**

To strengthen forest governance in Armenia, Azerbaijan, Belarus, Georgia, Moldova, Ukraine, and the Russian Federation.

### **Rationale**

The objective of strengthening forest governance in the seven participating countries was to be achieved through the activities and outcomes under the following sub-objectives:

(1) Improving implementation of relevant international processes of the seven participating countries.

- Seven monitoring plans for implementation of the St. Petersburg Declaration were designed against the targeted 14. They were, however, not regularly updated as planned in participating countries. The ICR notes (p.viii) that the country work plans and their updates were seen by national counterparts as substitutes and updates being incorporated into Program planning.

- A total 15 regional activities to promote cross-border cooperation and information sharing were organized under a regional work plan. The designation 'regional' referred to any activities that were not country-specific, i.e. they involved two or more countries. Most regional activities were in the form of bilateral cooperation and study tours. They included knowledge and learning activities as part SC meetings, international conferences as part of study tours to the participating countries and EU member states, or workshops (on combatting illegal logging, EUTR, Economics of Ecosystems Services and Biodiversity, ICT). A total of 12 outputs/activities were produced.

(2) Enhancing forest policy, legislation and institutional arrangements of the seven participating countries.

- A total of 104 national and sub-national activities were implemented.
- Support to reforms in forest policy, legislation or other regulations was provided under the Program. This included Strategic Forestry Development Plan (Belarus), a National Forestry Consultancy Office to provide necessary expertise and assistance for improved forest management and sustainable development of natural resources (Moldova), and a review and analysis of the current forestry-related legislation, institutional and administrative structure to provide recommendations for the National Assembly (Armenia).
- Training and study tours were carried out to build capacity in government institutions to improve management of forest resources. The government institutions included national level forest agencies;



forest enterprises, local municipalities for natural resource management. The topics ranged from guidance in nursery development and provenance selection, to law enforcement and policy design.

- 3764 forest practitioners were trained on topics such as identifying and documenting illegal forest activities (Armenia), voluntary forest certification (Belarus), traceability system (Moldova), balance of timber use (Russia), and communal forest management (Ukraine). The overall target of 3187 was surpassed, however if disaggregated by gender and minority groups, this was below the target for female participation (75%) and ethnic minority/indigenous people trained (50%). The ICR notes that data is incomplete as gender and ethnic breakdown was not received from all countries.
- The target of 50% for increasing understanding and awareness of the Program principles by forest practitioners and other stakeholders was not achieved. It was 28.4% in 2016, which was a 1.2 percentage point increase from the baseline of 27.2% in 2014. The results were based on two surveys (before -in 2014) and (after -in 2016) of forest practitioners and stakeholders in all seven countries (899 and 930 respondents, respectively). The stakeholders included national and subnational governments, civil society organizations, academia, businesses, media, development partners, and rural residents. The fact that the baseline survey was not conducted prior to start of the Program activities may have affected the before and after score.

(3) Developing, testing and evaluating sustainable forest management models at the local level on a pilot basis for future replication.

- The Program supported 34 best practice models, exceeding the target of 29. These were in Armenia (1), Azerbaijan (3), Belarus (4), Georgia (3) Moldova (8), Russia (13) and Ukraine (2). Best practice models were identified in collaboration with national counterparts and as a result, selection criteria were country-specific and models took various forms, for example: (i) development and application of new methods of sustainable forest management (such as Development of communal forestry practices at Tusheti Protected Landscape in Georgia, considered by the Georgian government a showcase for management of other protected areas; (ii) a briquetting project in Armenia; (iii) a sustainable forest management plan for Ismailly Forest Management Unit in Azerbaijan; and (iv) establishing a primary plantation in Telenesti, Moldova.

The project delivered most of its planned outputs and activities, in particular related to improving implementation of relevant international processes and developing, testing and evaluating sustainable forest management models at the local level on a pilot basis for future replication in the seven participating countries. At the same time, under the sub-objective of enhancing their forest policy, legislation and institutional arrangements, the survey results did not demonstrate the expected change in increasing understanding of the Program principles by forest practitioners and other stakeholders, as well as the decision makers' awareness of modern technology and information to improve forest law enforcement. While



it is reasonable to conclude that the project contributed to strengthening of forest governance in Armenia, Azerbaijan, Belarus, Georgia, Moldova, Ukraine, and the Russian Federation, there is no substantial evidence to support the immediate impact of the Program.

**Rating**  
Substantial

## 5. Efficiency

### *Economic analysis*

At appraisal, the PAD (p.18) made an assumption on the order of magnitude of the potential impact of the Program. The relative importance of the technical assistance program was estimated by comparing the Program budget with the value added of the forest sector to national GDP. An estimate of the economic rate of return of the Program, and subsequently improved forest governance, was able to increase (one-off) the value added in the sector by between 0.5% and 1% from 2006 levels.

At closure, the project team calculated the Program's average cost per output (documents 107, events 89, NPAC meetings 45), which was US\$42,800/output. The Program management budget of \$890,000 coordinated 119 separate activities over a 4-year period (or 30 activities per year at an average cost of \$85,000 each). A reference point was made to another TA regional project for comparisons with other TA, despite the different nature of activities. The ICR reports that in comparison to the Climate Adaptation and Mitigation Program for Aral Sea Basin with a knowledge management component of \$12.5 million for two countries, this Program could reach a larger group of countries with a larger audience with comparable financial resources. IEG struggled with this comparison as it is not clear what type of activities were carried out under the climate adaptation program.

### *Administrative/operational efficiency*

The implementation was affected by slow procurement processes but it did not lead to time extensions; the project closed as scheduled.

## Efficiency Rating

Substantial

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

The relevance of objectives is rated modest given shortcomings with regards to the ambition of the PDO, and that of design is modest due to weaknesses in the results framework. While it is clear that the project contributed to strengthening forest governance in Armenia, Azerbaijan, Belarus, Georgia, Moldova, Ukraine, and the Russian Federation, there is limited evidence to support the impact of the project. However, as the project delivered most of its planned outputs and activities, and the degree of achievement of its three supporting sub-objectives is strong, IEG has rated its efficacy as substantial. Along with substantial efficiency, IEG assigns the overall project outcome rating as moderately satisfactory.

### a. Outcome Rating

Moderately Satisfactory

## 7. Rationale for Risk to Development Outcome Rating

- The gains introduced by the Program can expected to be maintained in medium term, but there are clear risks to sustainability posed by country political, governance and economic environments. Without external coordination and stimulation, there is risk that the forest sector could be downgraded as a priority, given relatively weak advocacy for governance reform and sustainable forest management in many countries.
- At the local level, the translation from policy and legislation into practice was considered uncertain. In countries where forest sector agencies, high level government officials or elites were resistant to the Program principles, the risk of gradually returning to the status quo ante was seen as significant.

### a. Risk to Development Outcome Rating

Substantial



## 8. Assessment of Bank Performance

### a. Quality-at-Entry

Program design was adapted from Phase I, by drawing on lessons, and built on the previously formed partnerships between IOs, and structures. Program management and governance structure functioned as intended, despite the Program design complexities involving multiple implementing partners and numerous activities in seven countries.

Financial management and procurement arrangements were built on the experience from Program I and were in compliance with World Bank requirements. Risks were properly assessed and mitigation measures identified.

There were however weaknesses in the results framework and M&E design that did not adequately capture potential outcomes. Work plans were agreed only after the results framework (RF) had been designed, and, as noted by the ICR (p.), their ‘unpredictability’ was not fully reflected in the RF.

### Quality-at-Entry Rating

Moderately Unsatisfactory

### b. Quality of supervision

Supervision missions were carried out by the Program team leader in all seven participating countries. The frequency of supervision missions is not mentioned in the ICR. The annual Steering Committee meetings provided an additional opportunity to review the implementation of the annual regional and country work plans. Country-based staff and consultants supervised and supported activities in their countries, supported consultant selection and conducted quality control. Their work and the work by other IOs was supervised by the World Bank task team leader in Washington and by the Program secretariat in the Moscow country office. The Bank team monitored the Program implementation vis-à-vis agreed work plans. There were no issues with safeguards or fiduciary matters.

There were, however, the following weaknesses in supervision:

- While the Bank was diligent in ensuring terms of references and written outputs produced by IOs met quality standards, the project team was overextended, as described by the ICR (p.28), in its dual role as fund administrator and implementing team. There was a team leadership (TTL) turnover (3 TTLs over the life of the project) that required adjustments to differences in management style. Responsiveness to queries from partners was perceived as slow at times, and caused occasional delays.
- The original shortcomings in the results framework were not fully addressed during implementation, and as a result, the M&E of the Program could not support implementation to the level expected. Some country teams did not even report sub-indicators and this was not enforced adequately.



### **Quality of Supervision Rating**

Moderately Satisfactory

### **Overall Bank Performance Rating**

Moderately Satisfactory

## **9. Assessment of Borrower Performance**

### **a. Government Performance**

The Governments of the seven participating countries were not formally Program signatories (the recipient-executed grant funds were provided to the two INGOs). At the same time, high level national forest authorities were actively involved in Program management at the regional level through the Steering Committee and at national level through the NPACs. The ICR concludes that the NPACs and national Program focal points showed strong leadership in country programming and activity monitoring. In some countries (e.g. Belarus, Georgia and Moldova), the Program activities and experts were involved in high-level policy design and implementation, while in some other countries engagement was more opportunistic.

### **Government Performance Rating**

Satisfactory

### **b. Implementing Agency Performance**

**The Worldwide Fund for Nature International (WWF).** Cooperation and coordination levels by WWF with the World Bank and IUCN through the program management team were generally good, as noted by the ICR. The WWF's engagement with the countries was strong and the activities largely delivered intended results, positively influencing policy and practice. There was initial resistance to working in countries where it did not have an office (Belarus and Moldova), an issue resolved successfully by having remote program coordinators. There were coordination challenges between and within the four WWF implementing offices (WWF-International, WWF Danube-Carpathian Programme, WWF-Caucasus Programmer and WWF-Russia). Capacity and budget to develop all planned activities was insufficient toward the end of the program, leading to strains on management and negatively affecting the quality of activity preparation. The World Bank found that the quality of TORs and other written outputs developed by WWF varied, necessitating frequent revisions (ICR, p.29).

**International Union for Conservation of Nature (IUCN).** The entity developed strong relationships with country stakeholders. It supported governments in realizing many activities, working closely with counterparts in each country to identify and develop activities that were in line with country priorities. It followed the Program guidelines in facilitating activity selection, preparing and implementing activities. At the same time, IUCN did not deliver on all agreed-upon outputs, and the quality of written outputs and TORs did not always meet World Bank standards, suggesting weak internal quality control procedures.



IUCN did not follow the standard reporting template for its outputs. While country work programs were designed under the guidance of NPAC, it was sometimes evident, especially toward the Program close, that IUCN's institutional objectives influenced the proposed work. Consequently, work planning often became a balancing act between genuine national priority areas and the NGOs' own global program priorities (ICR, p.29)

The ICR adds that inadequate data collection for M&E was attributable to all implementing organizations.

### **Implementing Agency Performance Rating**

Moderately Satisfactory

### **Overall Borrower Performance Rating**

Moderately Satisfactory

## **10. M&E Design, Implementation, & Utilization**

### **a. M&E Design**

Most outcome indicators were not clearly defined and output-oriented. For example, one of the indicators was launching a credible process toward implementation of the St. Petersburg declaration (target 100%). As the ICR finds, the results framework did not capture the diversity of actions across the seven participating countries. At the same time, the ICR notes that some flexibility gave countries the leeway to define their own priorities and propose appropriate activities. Data collection was based on country activities and country definitions, and no single, uniform classification was established at program-level. Besides, the indicators were not precisely defined, leading to each country making its own interpretation.

The results framework was agreed by the four partners (the EU and three IOs), resulting in a common platform. The original results framework was revised in August 2014, at the request of the donor (EU). In addition to the revised Results Framework, the EU requested quantitative descriptions on some of the indicators (e.g. understanding and awareness of FLEG principles by key stakeholders) to report on specific activity outcomes and impacts. The ICR finds that the revised RF was able to clarify some indicators but it did not fully address its shortcomings.

### **b. M&E Implementation**

Data collection for M&E was done by country teams based on data collected at activity level. The M&E component was perceived by many program stakeholders as a procedural requirement without clear added value. Reporting was sometimes incomplete, inconsistent and delayed: country submissions did not always meet World Bank ISR deadlines. The ICR (p.12) notes that the shortcomings could be partly attributed to the RF, which was not necessarily reflective of the Program content. Results information was delayed and ISRs did not have the latest numbers. In some participating countries gender and ethnic distribution of beneficiaries was not collected.



A stakeholder survey was conducted in each country in 2014 and 2016 to measure understanding and awareness of the Program issues.

### **c. M&E Utilization**

The program-level M&E findings were not used widely to design activities, but according to the ICR, some individual activities such as assessments and evaluations of specific forest management or governance issues were used to inform the policy dialogue, sector guidelines, and legislation.

### **M&E Quality Rating**

Modest

## **11. Other Issues**

### **a. Safeguards**

This was a Category B project classified under the World Bank's Environmental Assessment OP/BP 4.01.

Impacts were projected to be mostly be indirect and cumulative. Other safeguard policies were triggered under the project were: Natural Habitats OP/BP 4.04, Forests OP/BP 4.36, Pest Management OP 4.09, Physical Cultural Resources OP/BP 4.11, Indigenous Peoples OP/BP 4.10, and Involuntary Resettlement OP/BP 4.12.

The ICR (p.13) reports that the program was in compliance with the World Bank environmental safeguard policies. The Strategic Environmental and Social Assessment Framework (SESAP) was used to ensure that Strategic Environmental Assessment (SEA) requirements were followed appropriately and consistently. The World Bank environmental and social specialists reviewed updates of country work plans, which were found to be in compliance (ICR, p.13).

### **b. Fiduciary Compliance**

*Financial management.* Annual post-review procurement supervision visits were conducted, as well as financial management regular supervision visits to IUCN and WWF headquarters. The fiduciary oversight between the field visits was conducted through the review of the semester financial reports and annual audited project financial statements. The ICR (p.13) notes that the quality and timeliness of the semester financial reports and annual audited project financial statements improved during the project lifetime. No significant management letter issues were raised by the auditors. Final audit reports were clean (ICR, p.13).

*Procurement.* Procurement procedures were challenging at times, leading to delays. The project involved



multiple implementing organizations with their own internal procurement processes that at times constrained activity progress. The World Bank procurement experts provided training for WWF and IUCN. According to the ICR (p.13), the IO managers held that World Bank’s procurement standards were too onerous for some of small-value items, creating unnecessary administrative work. There were no cases of misprocurement and the IUCN and the WWF conducted adequate due diligence.

**c. Unintended impacts (Positive or Negative)**

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**d. Other**

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**12. Ratings**

Ratings	ICR	IEG	Reason for Disagreements/Comment
Outcome	Moderately Satisfactory	Moderately Satisfactory	---
Risk to Development Outcome	Substantial	Substantial	---
Bank Performance	Moderately Satisfactory	Moderately Satisfactory	---
Borrower Performance	Moderately Satisfactory	Moderately Satisfactory	---
Quality of ICR		Substantial	---

**Note**

When insufficient information is provided by the Bank for IEG to arrive at a clear rating, IEG will downgrade the relevant ratings as warranted beginning July 1, 2006.

The "Reason for Disagreement/Comments" column could cross-reference other sections of the ICR Review, as appropriate.

**13. Lessons**

IEG has selected three lessons from the ICR, with some adaptation of the language:

- **Projects that focus on introducing institutional changes through technical assistance are more effective when they are aligned with the country’s agenda and when there is good cooperation with policy makers and advisors.** Under Program II, country engagement was stimulated by the ability of country counterparts to develop their own activities in line with their priorities.



- **Government-led multi-stakeholder platforms can be highly effective mechanisms for promoting country ownership, but can also dilute the overall program coherence.** Under this Program, the National Program Advisory Committee (NPACs) proved highly effective for engaging countries. They institutionalized decision-making, drew in expertise beyond government, while fostering dialogue between and within government and with civil society. At the same time, granting this level of control to individual countries made alignment with overarching project goals more difficult.

- **Regional activities tend to be more difficult to organize and promote than national or subnational level activities.** Under this regional Program, activities at the regional level received less emphasis than envisioned. It was easier for countries to develop national or sub-national activities that fit into their priorities. Regional activities depended more on outside actors (e.g. Program managers) to take the initiative and promote cross-border collaboration.

#### 14. Assessment Recommended?

No

#### 15. Comments on Quality of ICR

The ICR is results-oriented, concise and focused for a regional project that involved seven countries and numerous activities (the list of outputs in Annex 2 took about 50 pages). The ICR provides a candid analysis into the issues that affected implementations, project monitoring, and performance of the entities and the Bank. The quality of evidence is adequate, and the ICR has a clear focus on the results of the project. Lessons are evidence-based.

##### a. Quality of ICR Rating

Substantial