

Observations issued by the UNDP- CONAFOR-UCP regarding the Final Evaluation.

Listed below are the factual, focus and approach errors, as well as the mistakes made in context interpretation found by the National Forestry Commission (CONAFOR) and the United Nations Program for Development (UNDP-Mexico) in the Final Evaluation Report of the “Biodiversidad en Bosques de Producción y Mercados Certificados [Biodiversity in Production Forests and Certified Markets]” project. These errors strongly undermine the usefulness of the evaluation for the project’s learning process and constitute an important limitation that lead the UNDP and the CONAFOR to dismiss both the evaluation process and the benefits derived from said evaluation, in view that it does not comply with the quality standards required by the UNDP, nor with the initial Terms of Reference of the evaluator, Clemencia Vela.

Most errors in the report are imputable to the fact that the evaluator interpreted the information she received in an inadequate manner, to her lack of understanding of the forest management model promoted by the Mexican Government through the National Forestry Commission and its laws, and to her personal opinion on the specific issue of sustainable forest management which, with all certainly, skewed the evaluation’s findings and prevented an in-depth and comprehensive analysis of the project’s results. The above said is of great relevance, given that the evaluator indirectly questions the biodiversity conservation model, without having understood it in its proper dimension, thus making multiple contextualization errors, lacking a thorough understanding of the country’s particularities and the way in which the UNDP and the CONAFOR work, within the context of this model.

a) Focus errors:

1. The evaluator did not direct the evaluation toward fulfilling the objectives, metrics and goals set out in the results’ framework established in the project, **approved by the GEF**, so in effect she did not direct the evaluation toward the goal that was originally approved, but rather, under the interpretation that there were shortcomings in the design, the results obtained in the project are disqualified because the evaluator considers that there is no evidence of their contribution to the overall objectives of the GEF.
2. The evaluator did not understand that the project contemplates different agendas (certification, competitiveness, markets, capacity development, monitoring) and is not only centered on the conservation of Biodiversity, given that she acknowledges that for the forests to be conserved they must be cost-effective and people who live there, and from them, are able to develop fully. The evaluator’s analysis did not consider this dimension.
3. In general, the evaluator demonstrates an analytical bias, derived from her greater affinity to traditional conservation schemes (passive conservation), preventing an analytics openness that would have allowed her to make an impartial assessment of a different conservation model (active conservation), based on sustainable forest management, and acknowledges its environment, social and economic benefits as an alternative to the conservation model, via the NPA’s.

4. The evaluator centered her review on validating the GEF's objectives, not taking into consideration the development processes that are being promoted, as well as issues dealing with the strengthening of institutional, community and market issues. This partial approach also had a conservationist bias, which goes against the GEF's Strategic Objectives' logic, particularly those that acknowledge the need to work in the conservation of biodiversity in productive landscapes, as is the case.

b) Factual errors:

1. The results of the project are underestimated, emphasizing an evaluative analysis centered on the project's design. The Evaluator considered that the project's goal is at a level where it does not denote impact on the conservation of biodiversity, for which reason she belittles the results that were achieved, and that were oriented towards reaching the initial goal of the project.
2. According to the evaluator, a proposed goal is to *reverse deforestation, degradation and biodiversity loss*. However, the project contributes to the achievement of these results in that it is one of the goals established by the government. The original design of the project directs its actions towards contributing to that great objective.
3. There is a difference in the conceptualization of what adaptive management implies. For the evaluator, "the concept of Adaptive Management refers to a change of metrics" (comment on page 14 of the Report). We consider that adaptive management goes beyond a concept or modifications in the Results' Framework: adaptive management refers to the way in which the project's operation is directed under the changing conditions in the environment, to achieve the established goals and even attain unprogrammed results, but that are considered strategic for the project.
4. The efforts made to better reflect the results and to make the project "more assessable" were not taken into consideration, nor were the changes in coverage, in the target groups (including private companies) and in the perspective on intervention in the field (landscape-level). The evaluator focused exclusively on the issues relating to the project's design, attributing them to the project's operation and adaptation strategy. This resulted in the evaluator omitting the fact that the adaptive management of the project exceeds the changes made to the Results' Framework and prevented her from making an analysis of the project's adaptive management under the changing conditions in the environment, to realise the established goals and even attain unprogrammed results that were, non-the-less, strategic.

c) Context interpretation errors:

1. In her limited analysis, the evaluator concluded that further development of the *ejidos* could lead to social equity conflicts, with the argument that people from outside the *ejidos*, attracted by the economic benefits offered by the CFEs, could receive an advantageous sale of the original rights of the *ejido* members. The vision presented by the evaluator goes against development and proposes maintaining the conditions of poverty and marginalization in favor of conservation, which has already been proven to exert greater stress on natural resources.

This reveals the evaluator's lack of understanding of the context in which the project is developed and the incorrect interpretation of the reality and circumstances in which the CFEs operate. Experience shows that *ejido* members are aware of the value of the resources they possess, so they do not sell, because they are aware of the benefits they can obtain from being *ejido* members (and therefore Members of the CFE). This erroneous interpretation is just an example of the structural assessment errors and the many omissions in the understanding of the project's context, which caused most of her conclusions to be oversimplified, thus deriving in a lack of useful recommendations for the project.

2. The evaluator mentions that the communities increased their knowledge on biodiversity and on the species that live on their lands, but that there was nonetheless a greater focus on "how to use them" rather than prioritizing strategies to "conserve them". She highlights the case of the king vulture (*Sarcoramphus papa*) in Quintana Roo. However, during her field visit, she was told by the *ejido* members themselves that the nesting site of the species is marked for conservation and that said situation would not change, even though they could obtain higher revenues. Contrary to what the evaluator formulates, the consideration is that what these assessments denote is the success obtained by the project in promoting the sustainable use of forest resources.
3. The evaluator minimizes the replicability potential of the project, without considering that Mexico is a mega diverse country, with enormous wealth of forest ecosystems. The fact that conservation practices promoted by the project are replicated in regions that were not considered in its original coverage, demonstrates the project's success in view of its local replicability and its high potential to transfer results to other contexts; contrary to what the evaluator states, with the unfounded argument that it's easier to manage forests in Mexico than in other countries in Latin America and that its replicability is risky for other countries, which would obviously be a matter to be analyzed by said countries, it's not the evaluator's role to prejudge the way in which other regions or countries use the experience generated by the project.

The CONAFOR's and the UNDP's conclusions and position regarding the evaluation's final report:

The CONAFOR and the UNDP, respect the opinion of the evaluator, but do not share it. The CONAFOR and the UNDP do not expect the evaluator to be of the same opinion, given that she is an external and objective evaluator, but as the implementing and executing agencies, we are convinced that this exercise does not reflect the actual contributions made by the project to the agendas being promoted, and does not offer clear guidance on the opportunities that, based on the assumed findings, could be implemented to improve forest management in Mexico.

From our point of view, the project has clearly generated conditions to foster change in forest management in Mexico, with a shift toward sustainability. This situation is not reflected in the final report of the evaluation, on the contrary, as it has already been mentioned, the report has a clear bias toward a passive conservation logic, which goes against the spirit of the project, since it was designed as an active conservation project, directed towards productive landscapes. From the moment when it was conceived, this project was pioneer in initiatives, promoted by the GEF, which direct resources towards projects that involve productive activities based on the use of biodiversity.

Given the productive approach of the project, it does indeed change the paradigms on conservation strategies and offers a way out of the false dilemma that a choice must be made between *producing or conserving*, generating viable solutions that were tested and that have made it possible to *produce while conserving or to conserve while producing*.

This approach was the right choice, and the CBD on Biodiversity held in Mexico in December of 2016, confirmed it, given that the forest sector in Mexico showcased the results of this project as an example of "Biodiversity Mainstreaming", and also provided valuable elements for the design and integration of the Biodiversity Conservation Strategy in the forestry sector in Mexico, which was also presented at CBD 13.

Based on the above mentioned evidence, that showcase the impact of the Project at all levels, that is to say, at a local level in the Community Forestry Enterprises, at a state and regional level in the implementation of management and conservation of biodiversity criteria and at a national level in the implementation tools of the biodiversity conservation policy, in our role as Implementing and Executing Agencies, we cannot agree with an assessment that is indifferent to results that meet the objectives established in the original design of the Project and that, due to a more personal view of the evaluator, is directed toward other models of conservation, even making statements based on assumptions or personal assessments that have no relation with the results being evaluated.

Listed below, are the observations issued by the UNDP, the CONAFOR and the PCU regarding the Report on the Final Evaluation of the Project "Transformar el manejo de bosques de producción comunitarios ricos en biodiversidad mediante la creación de capacidades nacionales para el manejo de instrumentos basados en el mercado [Transforming the Management of Community Production Forests, Rich in Biodiversity, Through the Creation of National Capacities for the Management of Market-based Instruments]", intended to emphasize the differences in the evaluator's approach to the evaluation, regarding the CONAFOR's and the UNDP's vision of the project and its results:

1. In general, the evaluator did not direct the evaluation toward fulfilling the objectives, metrics and goals set out in the results' framework, approved by the GEF. The above said, due to an alleged "failure" in the project's design. Nonetheless, we believe the evaluation's perspective did not identify the general goal of the project, toward an active conservation of Mexico's forest resources in productive forests, and, regardless of the conceptual orientation of the evaluator (toward passive conservation), it was her duty to conduct an objective assessment in accordance with the Results' Framework approved by the GEF, based on the attention areas (plots) targeted on the project, certainly referring to productive forests, resulting on her not directing the evaluation toward the original goal approved by the GEF, contained in the results' framework, but rather, directing the assessment towards an evaluation with a conservation view in Protected Natural Areas. In that sense, we consider that the evaluation loses validity, since it was not based on the vision and the territories (productive landscapes) for which the project was designed.
2. The CONAFOR considers that the conservation practices promoted by the project meet the evaluator's criteria, with respect to the fact that strengthening the producers' capacities must promote conservation and not only increase production. This has been demonstrated with specific examples that the evaluator encountered, or of which she was informed, as is the case of the new management programs for the forests of Chihuahua and Durango, the habitat of the thick-billed parrot, where the degree of exploitation of the *Pinus ayacahuite* species has

diminished, given that it is a source of food for the thick-billed parrot (species at risk). This fact was not known by the local inhabitants, and currently serves as the basis to implement a mandatory best management practice. Contrary to this situation, the evaluator mentions that communities increased their knowledge on biodiversity and on the species that live on their lands, but that even with these information, a greater focus had been given to “how to use them” rather than developing strategies on “how to conserve them”.

3. The project not only fulfilled the metrics’ framework committed before the GEF, but also managed to transform its proposals into national policies, which is an added value that the evaluator either confused or did not assess in its proper dimension, giving greater weight to its positive effects on economic markers (which makes the success of the project clear), and failed to observe the achievements in conservation, biodiversity and forest resources in general. Agreeing that the project’s and the GEF’s main goal is the conservation of biodiversity, which was evidently achieved (close to two million hectares certified, over a thousand plots incorporating conservation practices in their Management Programs, more than half a million hectares identified as attributes of high conservation value, among other achievements), it was also possible to improve the development metrics of forest producers, which helps maintain sustainable and biodiversity-friendly practices, by strengthening the management capacities of resources to conserve biodiversity (Case: The Chinatu Ejido in Chihuahua received international resources from the IUCN for a program to monitor birds.)
4. One of the goals establish by the project is the development of *ejidos*, by improving the competitiveness indicators. This goal is integrated into result number 3 of the project, and it generates better conditions for the comprehensive use of the forest’s resources that are being exploited. This is contrary to the evaluator’s statement, who insists that any further development of the forestry ejidos could lead to social equity conflicts, under the argument that this could give raise to the sale of original rights granted to the *ejido* members to people outside the *ejido*, attracted by the economic benefits offered by the CFEs. In this sense, unless the evaluator has evidence that the project promoted the sale of *ejido* rights (which is not the case), what the evaluator does confirm with these assessments is that the project had a positive effect in the improvement of the socio-economic conditions of the target population and, therefore, confirms the attainment of one of the main goals established by the project.
5. The results were underestimated by the perception that there were deficiencies in the project’s design. According to the evaluator, a proposal for a goal is to *reverse deforestation, degradation and loss of biodiversity*. We consider that the proposed wording might indeed be more focused on the impact on the GEF’s goals, however, they are unattainable goals for a project in such a short time of operation and with such a small budget. Rather, it’s a goal fit for the government structure of an entire country and, according to the original design of the project being evaluated, the approved results contribute to this great objective.
6. We consider that adaptive management goes beyond a concept or modifications to the Results’ Framework. Adaptive management means the direction given to the project’s operation under the changing conditions in the environment, to achieve the proposed goals and even attain goals that were not originally established but that are considered strategic for the project, and in this case, the efforts made by the PCU, notified and approved by the Project’s Board, to better reflect the results of the project and make it “more assessable”.

7. In addition, the evaluator did not demonstrate the necessary political sensitivity to interact with the people from the *ejidos* and communities, and assert their views. This, to the detriment of the wholeness of the evaluation and in favor of the evaluator's bias and exclusive conceptualization, with respect to sustainable forest management.
8. The expectations and agreements regarding the evaluation were clarified since the kick-off meeting held on August 30, 2016, through the minute drawn up on said encounter. The evaluator was given the opportunity to communicate her observations in writing, since the agreements included in this minute, along with the provisions of the Terms of Reference (ToRs), were the basis for defining the scope of the evaluation and, more importantly, to inform her that her compliance determined the disbursement of payment for the evaluation exercise. The evaluator also omitted this minute.
9. In general, the final report of results presented by the evaluator is very poor, with no findings that are useful to the project and with many factual and focus mistakes and errors in her context interpretation. We recommend that the UNDP does not hire this evaluator for future evaluations, given that she did not meet the quality standards required by the UNDP in the ToRs, to be able to use the conclusions of this evaluation in the design of the second phase of the project (please refer to the minute of the meeting where the UNDP and the CONAFOR clarified the evaluation requirements and gave specific quality guidelines).

Finally, the executing entity is aware that the project needs consolidation in certain areas (analysis and processing of biological monitoring, evaluation of the field training' effects, transition from plot to landscape level) and that these will be issues for the national institutions related to the forestry sector to work on, especially the CONAFOR; however, the results of the project lay the groundwork to reinforce the involvement of the institutions in the field, in addition to identifying the need to strengthen monitoring systems for species, regions and ecosystems, increasing specific capabilities and the analysis of the more vulnerable communities in forest management.