

Annex 11 Audit Trail

To the comments received on 8th August, 29th September and 5th October 2018 from the Midterm Review of the UNDP-GEF Project *“Strengthening Sustainability of Protected Area Management in Myanmar”*

The following comments on the draft MTR report were provided by email. They are referenced by institution (“Author” column) and the relevant Para No to which the comment refers (where relevant).

Author	#	Para No/ Comment Location	Comment / Feedback on draft MTR Report	MTR Team response & actions taken
UNDP via email 5 th October 2018	1	N/A	UNDP has iteratively provided substantive comments on the MTR.	The MTR has responded to all comments from UNDP during the iterative review process by offering further explanation, correcting errors and/or making changes as needed to clarify, correct and fill gaps. These have been shared with UNDP before finalizing.
UNDP via email 5 th October 2018	2	N/A	UNDP does acknowledge the issues flagged by the MTR vis-à-vis the ambition and complexity of the project vis-à-vis the baseline, project duration, capacity and resources as well as the inconsistencies and weaknesses in the project document which require actions at several levels including updating the results framework, to help in measuring progress at the outcome level and reporting against gender in the annual PIRs.	No response/action required.
UNDP via email 5 th	3		The MTR notes that the ‘most serious immediate risk to project results are the widespread conflicts	The comment refers to statements in Paras: Paras: 15, 246 & 248. No response/action required.

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October 2018			over governance of land and other natural resources and lack of clarity on how to address customary claims to these. It also underscores the project implementation risks and complex relationship between land tenure, armed conflict and internal displacement and inadequate analytical appreciation of the linkages and the strategies proposed to overcome these risks.	
UNDP via email 5 th October 2018	4	N/A	It would be useful if the MTR could make specific recommendations and highlight the modality of strengthening the community engagement models in line with and illustrated by international good practices including on operationalization of the ICCAs. It has been noted that currently the 'global coverage of ICCAs comparable to that of governments' protected areas, i.e. about 13% of the terrestrial surface of the planet' and perhaps there are useful lessons which can be further adapted and applied in Myanmar. Hopefully, this will also be useful in strengthening community engagement on PA management across each of the demonstration sites and lead to more effective participation of communities in the PAMCCs at	Further information and suggestions have been included to address this request from UNDP through the addition of Paras 258 – 267 in the MTR report including examples of international good practice and guidance with particular reference to ICCAs.

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			the township level and if necessary prioritization of budgets around the same.	
UNDP via email 5 th October 2018	5	N/A	After the passage of the Biodiversity Conservation and Protected Areas Law in May, Myanmar has a real opportunity to pursue more community led conservation approaches. An elaboration of this aspect of the MTR and how the rules development process can be aligned to the international good practices would also help in providing concrete pointers to ongoing efforts at resolving the Hkakaborazi impasse and further test out effective community engagement processes and inform new alternative approaches to PAs in Thanintharyi region.	<p>The MTR agrees fully with this comment, which is partly addressed in the new Paras 258-267. Additional detail has also been added to Para 255 to stress the importance of clarifying the legal status of buffer zones and rationalizing approaches towards these as is one of the key indicators for Output 1.1 in the Project Results Framework (Table 9). This is particularly important, since the Forest Department envisages allowing co-management and community conservation areas in PA 'buffer zones', i.e. in land neighbouring the PA but not under the control of the Forest Department. Such clarification is essential for the sustainability of project results on community engagement in conservation.</p> <p>Ideally the rules accompanying the new Biodiversity law would allow for the creation of buffer zones with a clear legal status allowing for consistent approach towards such areas across the country. However, this may be challenging at this</p>

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				<p>stage given the number of other government departments who would need to be consulted to agree this. This is why the MTR suggests a more practical measure during the life of the project that could potentially allow buffer zones to be established through a systematic process on a case by case basis <i>“Develop a Forest Department Standard Operating Procedure (SOP) and/or instruction on PA buffer zone management and use.”</i> (MTR Recommendation R2.2)</p> <p>In terms of international good practice, IUCN’s Centre of Environmental Law is a particularly useful source that also provides examples of biodiversity laws and policies from other countries.</p> <p>https://www.iucn.org/theme/environmental-law/about/environmental-law-centre</p> <p>The IUCN CEL also manages ECOLEX, https://www.ecolex.org/ a comprehensive webbased information portal on environmental law. Also see:</p>

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				https://www.cbd.int/ecolex/ for further information.
Forest Department via WCS email 8 August 2018	6	N/A	R3.4: Clarify Myanmar Wildlife College - While MWC was WWF's proposed concept and was not feasible in the existing FD's capacity development institutional setting and funding availability, the institutionalized training under GEF project has been adopted as FD institutional capacity development mechanism	<p>The MTR thanks NWCD for this clarification. Para 148 of the MTR report has been amended as follows:</p> <p>Original wording:</p> <p><i>“Finally, since 2017 there have been discussions on the possibility of establishing an independent Myanmar Wildlife College modelled on the Southern African Wildlife College. This would aim to create a dedicated cadre of wildlife professionals through vocational training, and unlike MFS, would not be limited to just FD staff. Initial scoping work on this was undertaken for MONREC in November 2017 by the Southern African Wildlife College with support from WWF Myanmar. There has also been discussion on joint curriculum development between WWF, WCS, the Smithsonian Institute and FFI. The MTR discussed the proposal briefly with both WWF and WCS, but had no opportunity to discuss it with other key</i></p>

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				<p>stakeholders in the FD, including NWCD and TRDD. Greater clarity is needed on the Wildlife College proposal in order to ensure that the work being undertaken by the project under Outcome 1 remains relevant and is of long-term value. This should be discussed and clarified at the next PB meeting or by calling a separate meeting together with all relevant stakeholders from the FD as well as WWF Myanmar, UoFES and others.</p> <p>Revised wording of sentences highlighted in yellow above:</p> <p>“After reviewing the draft MTR report, NWCD has clarified that the training that is being developed through this project will continue to be institutionalized within the FD. The development of the Wildlife College and its relationship to the work being undertaken by the project under Outcome 1 should continue to be periodically monitored by the PB by engaging with all relevant stakeholders from the FD as well as WWF Myanmar, UoFES and others to maximize synergies and complementarities.”</p>

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				<p>The following action under recommendation R3 in Tables 3 and R3.4 in Section 5.2 has also been changed as follows:</p> <p>Original wording:</p> <p><i>Clarify the status of the proposed Myanmar Wildlife College and the implications for new training courses developed by the project that will be delivered through existing institutions</i></p> <p>Revised wording:</p> <p><i>Ensure complementarity between the proposed Myanmar Wildlife College and the new training courses developed by the project that will be delivered through existing institutions.</i></p>
Forest Department (NWCD) via WCS email 8 August 2018	7	N/A	R4.4: UNDP micro-financing for CF activities in Htamanthi WS - it may not be feasible as the area is not UNDP project site and long term monitoring and supervision will be difficult	The comment is noted. No change has been made to the report as the MTR has only suggested that microfinance may be one option for the project to explore amongst others (see Para 239 and the related Recommendation 4.4).

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Forest Department (NWCD) via WCS email 8 August 2018	8	N/A	R9.7: Clarify roles of CTA and NPM: WCS should make internal arrangement to clarify the roles of CTA and NPM and present to PB for the approval	The final sentence of Para 202 has been amended to address this comment from NWCD: <i>“Major decisions taken on key project management roles such as the NPM and CTA should also be clearly recorded and approved by the PB.”</i>
Forest Department via UNDP email 5 th October 2018	9	N/A	a) The recommendations from the MTR fully support the implementation of project activities.	No response / action required
Forest Department via UNDP email 5 th October 2018	10	N/A	b) If the National Consultant understands the local conditions and departmental instructions, some of the recommendations will consistent with the existing situations (e.g. weakness in stakeholders engagement between Hkakaborzi National Park and Community Forest supports the local communities for long-term land tenure and landuse right instead of land lease).	The MTR sought further clarification on this point from the FD via WCS and understands that NWCD would like reiterate that the politics in Hkakaborazi National Park are exceptionally complicated because of inter-ethnic tensions. local politics and vested business interests and cannot be resolved through engagement of local communities by the Park Warden and FD alone. The MTR fully accepts this point and has already highlighted the complexity of the situation in Paras 155-156 of the MTR report. A multi-stakeholder approach and skilful negotiations will

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				<p>be needed to overcome the current challenges. Para 19 has been edited to reflect. The second bullet under the 'Achievement Description' column in Table 2 has also been slightly modified with the addition of the phrase shown in yellow highlight below:</p> <ul style="list-style-type: none"> <li data-bbox="1406 730 2029 1129">□ "Progress to date has been mixed, however, due to long delays at the outset and other factors outside the project's control, in particular conflicts between ethnic armed forces, local communities, other political or business interest groups and government. The latter has affected project progress at demonstration sites (Hukaung Valley Wildlife Sanctuary and Hkakaborazi National Park) as well as more broadly in terms of expanding the PA system." <p>NWCD has also clarified via WCS that it uses the term 'land right' rather than 'land lease' under its Community Forestry work.</p>

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				The MTR agrees that it would be better to provide communities with long-term security of tenure over land through land rights rather than renewable leases. The reality in Htamanthi at present is that CF's are being established in Vacant and Fallow land and these areas have to be leased from other government departments as the land does not belong to the FD (see Para 177-178). The first and last sentence of Para 177 has been amended to indicate the FD is supportive of strengthening land rights rather than in favour of leases.
Forest Department via UNDP email 5 th October 2018	11	N/A	c) There is a need to discuss between Forest Department and WCS regarding the activities (e.g. Biodiversity Conservation Fund, PAs Management Plans, and Ecotourism Plan), which cannot be implemented according to the project work plan, in order to find a solution.	The MTR agrees and suggests this is discussed between the Project Partners and changes in timeline/outputs formally agreed by the Project Board. No change to report.
Forest Department via UNDP email 5 th	12	N/A	d) Two project staff should be assigned under GEF 5 project as there is limitation of NWCD staff who are assigned to collaborate in the implementation of GEF 5 project on behalf of Forest Department.	There is flexibility in Project Management arrangements. This proposal can be discussed and approved by the Project Board. No change to report.

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Forest Department via UNDP email 5 th October 2018	13	N/A	e) For regular inspection at field level, GEF 5 project should support the monitoring mission including FD, WCS, and UNDP.	<p>The MTR agrees annual joint monitoring by the three partners would be beneficial. This is already highlighted in Para 195.</p> <p><i>“During MTR interviews, government stakeholders in particular stressed the need for more systematic project monitoring and technical support by UNDP, including joint monitoring field missions with government, as well as better communication about project progress and plans.”</i></p> <p>An additional sentence on this point has been added to the MTR report to reiterate this in Para 226:</p> <p><i>“Additionally, as noted earlier and specifically requested by government (Para 194), UNDP and the FD should undertake joint monitoring field missions at least once a year.”</i></p>
Forest Department via UNDP	14	N/A	f) The planned project activities, which cannot be implemented in the project area, PAs, (e.g. Hukaung) during the project period, should be	Given the project has limited implementation time and resources left, the MTR believes it would be better to consolidate positive impacts and scale

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email 5 th October 2018			moved to new location, PAs, where there is opportunity to implement the project activities but there is less management regimes (e.g. North Zarmayi).	these up in Htamanthi and find ways to overcome on-going challenges in Hkakaborazi and Hponkanrazi rather than expand to a new area. Much can also be done to further develop capacity of different stakeholder groups and to consolidate and institutionalize project knowledge and lessons as suggested in Paras 258 – 267.
WCS By email 29 Sep 2018	16	201/p.91	<p>Original wording:</p> <p>Furthermore, the international CTA who has been leading the work related to Outcome 1 has been on extended leave due to health reasons for several months and may be unable to assume the same level of responsibilities on his return.</p> <p>Proposed wording:</p> <p>Furthermore, the international CTA who has been leading the work related to Outcome 1 took leave from first week February to last week March due to health reasons. As he has returned back and resumed his responsibility, UNDP and WCS should work out to address the potential technical gaps created by his absence.</p>	<p>Para 202 has been corrected and reworded as follows:</p> <p><i>“Furthermore, the international CTA who has been leading the work related to Outcome 1 took leave from first week of February to last week of March due to health reasons. UNDP and WCS should identify ways to address any potential technical gaps created by the CTA’s absence. It is important that all project partners consider the implications of these developments to ensure that any disruptions to project implementation and continued progress are minimized. Major decisions taken on key project management roles such as the NPM and CTA should also be clearly recorded and approved by the PB. ”</i></p>

