Annex 9: TE Audit Trail

The following table describes how the received comments on the draft TE report have been addressed the final TE report. This audit trail is a mandatory annex of the final TE report.

**Responses to Comments received**

The following comments were provided on the draft Terminal Evaluation report; they are referenced by author, comment number (“#” column) and location in the text. Note that the paragraph numbering and formatting has been corrected in the final report, and the references in the table refer to the finalized layout for ease of reference.

Written comments were received from the UNDP CO and UNDP RTA on 12 and 26 March 2021.

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| **Institution/****Organization** | **#** | **Para No./ comment location**  | **Comment/Feedback on the draft TE report** | **TE team****response and actions taken** |
| UNDP CO | 1 | Page 1, Executive Summary Table | Please add **‘Thailand Environment Institute’** as another NGO/CBO Involvement cell.  | Accepted and included. |
| UNDP CO | 2 | Page 3, Ratings Table | Some ratings are in range. Please assign appropriate ratings for “Overall Quality of M&E” and “Quality of Implementing Partner Execution” | Accepted – specific ratings have been provided for “Overall Quality of M&E” and “Quality of Implementing Partner Execution” in this table, in the relevant text sections, and Table 10. The rating for IP execution has been set at MS specifically taking into account improvements in execution performance in the latter half of the project including the extension period. Recommendation E.3 has been added to ensure that IP capacity to execute GEF projects efficiently is strengthened at the start of future GEF projects. |
| UNDP CO | 3 | Page 3, S9, para 1,  | **Rating given ‘Moderately Unsatisfactory’.** Given the fact the targets of this outcome were given 80% achievement (see Annex 12). This rating should be reconsidered. There are several indicators which have been 70-80% achieved, and one target with 100% achievements, one with 90% achievement. Two indicators were given 0% achievement (#4 and #5). However, with #5, given it was on track at MTR but several outside factors have contributed to the underachievement of this target, a partial achievement ‘score’ may be more appropriate.  | Paragraphs 53-66 provide detailed analysis against each of the seven indicators for Outcome 1. While there was good progress in a number of areas as reflected in progress against the indicators mentioned, there were also significant shortcomings – notably the failure to adequately engage with Thale Noi NHA, which forms a very important part of the KKL peat swamp, weak METT performance for both NHAs, and significantly increased threat indicators for both NHAs; as well as the unfinished nature of the management regime for the peat swamps – which requires follow up to secure effective water and carbon management.  |
| UNDP CO | 4 | Page5, S10, para 2 | **Rating given ‘Moderately Unsatisfactory’.** Please reconsider/reconfirm this rating after addressing further comments below re Annex 12.  | The paragraph clearly explains the basis for the MU rating. Please see responses to comments 28,29 & 30 below – these do not provide sufficient basis to change the rating in the view of the TE team. |
| UNDP RTA | 5 | Page 6, last paragraph | It is important to mention that in the final 2+ years the project implementation improved significantly and include the reasons for this improvement, e.g. Request to UNDP Thailand for support by ONEP and support provided by the UNDP.  | Accepted; see additions to this paragraph. |
| UNDP CO | 6 | Page 7, para 2 | Turn this observation into a recommendation. This can be addressed by organizing field visits for project board members to the site in order for them to have a full understanding of the local situation/context. It should be a good lessons learned for other projects as well. | Accepted; this point has been edited and included as Recommendation C.3 |
| UNDP RTA | 7 | Page 10, D2 | Please discuss with UNDP CO and delete ‘?’ | UNDP CO has agreed to address this recommendation |
| UNDP CO  | 8 | Para S9, Page 13 | Several indicators have been 70-80% achieved, and one with 100%, and one with 90% achievement. Two indicators were given 0% achievement (#4 and #5). Indicator #5 was on track at MTR. However, several outside factors have contributed to the shortfall of the achievement of this target (i.e., forest fires, El Nino). These are the only two indicators that were not met. This rating should be reconsidered.  | This comment appears to be a duplicate of Comment 3 above – see the corresponding response. |
| UNDP RTA | 9 | Page 16, para 24 | Please mention that a few recommended sections per the TE Guidance are left out and provide a justification for it (e.g. to improve flow of the report? eliminate redundancy? etc.). The response should also include suggestions on how the TE structure can be improved. | Accepted and included in #24. Note that significant additional material has also been provided over and above the table of contents in the TOR. |
| UNDP RTA | 10 | Page 27, para 61 | UNDP Thailand’s role is not consistently described throughout the document. It is understood that UNDP Thailand had an oversight role for a full NIM project but there was a support service request by IP (was this at the PPG stage?) but also there was an additional support requested in 2018? What was the additional support requested in 2018? This should be clearly described here. Also, words - oversight, execution and administered - are used to describe UNDP Thailand’s role, please revise for consistency. These words have different scope in the GEF context. | Accepted and additional material included responding to these questions in #63 and scattered through the document (for the terminology point).The Standard Letter of Agreement signed by UNDP on 13 Sep and ONEP on 19 Sep 2016 for 100% Support Services is the only agreement on the project.  There is no other revision. However, the implementation arrangements changed for the 6 month Extension Period, when RECOFTC’s contract ended and the IP (ONEP) requested UNDP to support the budget management and implementation during the extension, so UNDP CO staff were working closely with the service providers and ONEP mid-management, who acted as the Project Management Unit. |
| UNDP CO | 11 | Page 32, para 77 | Valid comment but this may be acceptable (by GEF) then. Any structural change to it during implementation will require an excruciating process. While some changes were made to the outcome/output levels during project implementation, the validity of the structure had never been raised.  | The TE team maintains that the described points were flaws in the design of the RF. This section of the report refers to project design (not implementation). |
| UNDP RTA | 12 | Page 40, para 93 | Ref to Output 1.5, It is important to discuss the adaptive management approach the project took, with the support from the RTA and UNDP Thailand, pertaining to the project management after the initial delays resulting from changes in EPA policy and ONEP’s rollback on its project role. Further, discuss the importance of the adaptive management decisions in improving the project performance. | Accepted; additional sentence acknowledging adaptive management included in #93 |
| UNDP RTA  | 13 | Page 45, Table 4, ‘% Variance’ column | -17% and -33% are significant variances. Please include additional and specific details for these variances e.g. reasons that caused these variances by linking them to specific project activities.  | See #113 and #118 for further information on the activities and contributing factors to these variances |
| UNDP RTA  | 14 | Page 49, para 125 | This might be more relevant under UNDP Implementation/oversight section.  | See #144; this paragraph introduces UNDP’s role, of which M&E is a part. |
| UNDP RTA | 15 | Page 50, para 127 | How was the GEF OFP kept informed of the project M&E activities and identified issues and delays?  | The OFP was invited to Project Board meetings, otherwise left the project management to ONEP |
| UNDP RTA | 16 | Page 50, para 128 | Ref: ‘QPR template for GEF’, Is this one of the TE recommendation? If not already included, please include this as a recommendation.  | See Recommendation C.2 |
| UNDP RTA | 17 | Page 51, para 134 | Did ONEP request for UNDP support service? If yes, please indicate this accurately with date, and provide reason(s) for this request. | The Standard Letter of Agreement signed by UNDP on 13 Sep and ONEP on 19 Sep 2016 for 100% Support Services is the only agreement on the project.  There is no other revision. The LoA refers to consultations between UNDP and ONEP as the basis for the agreement, although no specific reasons for the request are stated. This approach was acceptable during GEF-5, but is more stringent now. |
| UNDP RTA | 18 | Page 52, para 134 | Good summary. However, suggest including a very brief summary of Internal Control Audit findings that led to change in the financial management model. Please clarify what triggered the Internal Control Audit (e.g. policy requirement or the quality of the expenditure reports? This summary is better suited under implementation/oversight, some of this information is in para 144.  | Accepted; # 134 deleted and incorporated into #143 and #144 including additional information on the ICA findings. UNDP CO has clarified that the Internal Control Audit is a policy requirement. An ICA is triggered by a threshold budget level which a partner has received from UNDP. It’s $150,000 per year (previously $300,000 per UNDP’s programme cycle). |
| UNDP RTA | 19 | Page 52, para 135 | Why was a gender analysis not completed despite the recommendation from the MTR? How were the gender issues identified and baseline established for the gender integration and mainstreaming in absence of a gender analysis? Please elaborate. | No specific reasons have been determined for non-completion of the gender analysis. It is clear where the responsibility lay but not why action was not taken. There was no gender action plan, no gender disaggregated indicators in the RF and therefore no baseline established. RECOFTC is an experienced organization with international exposure, therefore gender mainstreaming principles are embedded in its practices (for example, see: <https://archive.recoftc.org/basic-page/social-inclusion-and-gender-equity> ) and this is how it was practised during execution, not through any systematic M&E process.  |
| UNDP RTA | 20 | Page 52, para 136 | Please include reason(s) for not revising the SESP. | RTA commented in PIR 2019: “Project attention to safeguards can be improved through a revision of the SESP. During a monitoring mission in late 2018 the RTA provided a recommendation that the SESP needed to be updated based on risks that were not captured at CEO Endorsement stage. These new and escalated risks are reported in this PIR, however the SESP has not yet been revised detailing these risks and identifying management responses. The SESP revision should be completed by the PMU and UNDP CO as a priority and provided to the RTA for clearance ahead of signature by UNDP CO”. It is therefore clear where the responsibility lay, but it is not clear why action was not taken. |
| UNDP CO | 21 | Page 53, para 140 | A rating must be assigned for ‘Overall ratings for M&E’  | Accepted; the overall rating for M&E has been given as MU. |
| UNDP RTA | 22 | Page 53, para 142 | Please include in the recommendation, if not already, how a UNDP CO can avoid similar situation in future? | See lessons learned, second bullet under *Strengthening Implementation* on p6 & 107 |
| UNDP RTA | 23 | Page 55, para 146 | Ref: ‘GEF’s normal boundaries for GEF Agency involvement in execution’ –this text is not necessary. UNDP CO is indeed providing the standard services that will enable the project to run/to get back on track (i.e. procurement service (engaging RECOFTC, recruitment of consultant, engaging other responsible parties, etc). These tasks are regular execution support and not beyond GEF’s normal boundaries for GEF Agency. | Accepted and addressed in #146 |
| UNDP RTA | 24 | Page 56, para 151, Line 8 | In addition to oversight, describe how UNDP Thailand’s execution support was crucial to bring the project back on track? | Accepted and addressed in #151 |
| UNDP RTA | 25 | Page 58, para 158  | The TE should include additional analysis on the implementation of the safeguards management measures. Please include the name of the mitigation plan. Was it one comprehensive plan or a targeted risk management plans? How were the risks upgraded and identified in the subsequent PIRs incorporated in the risk mitigation plan? | Additional material has been included in para 158 following consultation with the UNDP CO. |
| UNDP RTA | 26 | Page 70, para 204 | How did the COVID-19 impact planned stakeholder engagement and what was the adaptive management measures from the project to address this challenge? | This paragraph concerns the assessment of the project’s relevance in terms of stakeholder engagement. See Section 4.2.7 for COVID-19 impacts on project implementation. |
| UNDP CO | 27 | Annex 2 | Please record full names/job title/organization; Missing Chainarong Khongkua, Khon Rak Thin | Revised Annex 2 inserted |
| UNDP CO | 28 | Annex 12, Indicator 9 | A rating is needed for this indicator. Significant progress has been made. For example, a water management model was developed and the area of 4,600 ha has been clearly demarcated (with support from DNP, Chai Pattana, RID). Therefore, there is sufficient data to rate this indicator. Please review additional information from the report attached (Kuan Kreng Peat Swamp in Thai) and validate data with the researcher Mr. Suchart Sailamai. bausara@hotmail.com, Tel: 085-909 9492. He can grant an interview on how the project can track the achievement on carbon under the outcome 2, indicator 9-12. | As described in the analysis of the RF indicators on p33, the indicator is not sufficiently specific to interpret what is meant by “under effective water table management regime”; also the TE team was unable to investigate site conditions on the ground to confirm whether water tables are actually being managed effectively over the 4,600 ha. This is a key limitation for the assessment of this particular indicator. The TE team has reviewed the progress report provided, which gives information on progress towards developing the peat swamp inventory, including results of a field survey of peat soils at three stations in KKL conducted in April 2019. The results of this field survey included the statement that “In 2019, the water table is 50 cm in the dry season (p93)”. The TE team acknowledges this result, but in the absence of systematic water level monitoring data that show a trend over time, it remains impossible to use this one observation as firm evidence of effective water management being in place. Only a few months later, in July-August 2019, enormous fires swept through a large area of the KKL peat swamp – if water levels had been maintained at an optimum level, would these fires have had the same impact?Following further consultations with ONEP and RECOFTC, the TE team maintains that this indicator cannot be rated for the reasons stated. Please refer to the qualitative information provided in Annex 12 for further details. It is acknowledged that the project has completed the water modelling, guidelines for the use of the model, and short term water management measures have been made, but this has not been fully put into practice and TE interviews indicated that while the main responsible agencies appreciate the approach promoted by the project, they are not yet fully on board.The request for additional consultation was made several weeks after the draft TE report had been submitted on 26 February 2021, therefore it was not considered feasible to follow up, in line with RTA guidance. |
| UNDP CO | 29 | Annex 12, Indicator 11, 12 | The Kuan Kreng Peat Swamp report (Thai) prepared by Mr. Suchart provides information for indicator 11 measurement. Also, the national TE consultant should talk to ONEP (Climate Change Coordination Department) for more insight re the calculation of the GHG emission and sequestration targets. | The mentioned progress report has been considered by the TE team. The carbon data presented were gathered in April 2019, and therefore should have been included in the GEF CCM Tracking Tool at project completion (dated 13 August 2020). The relationship of the “carbon restoration” results to specific indicators is not clearly established in the report – so although it is possible that the results do show a positive change in CO2 emission reduction over the baseline value, it remains very difficult for the TE team to interpret this information meaningfully – also because this was a spot result and not part of a series of monitoring results over time that show a trend that can be related to water level management.Following further consultations with ONEP and RECOFTC, the TE team maintains that this indicator cannot be rated for the reasons stated in the report. Please refer to the qualitative information provided in Annex 12 for further information. It should also be noted that the role of the TE team is to evaluate the monitoring data provided by the project team against the RF targets, not to attempt to calculate or interpolate the monitoring data from different sources.  |
| UNDP CO | 30 | Page 3, Evaluation Ratings Table | The rating is in contrast with the rating for each indicator explained in the Annex 12. Please revisit.  | It is not clear which specific rating or ratings this comment refers to - presumably Effectiveness, which takes account of progress towards the project objective based on the RF indicators (as summarized in Annex 12). While progress was made towards the objective, and credit is due for these achievements, there were also shortcomings that the TE must take account of. These shortcomings are explained in the text of Section 4.3.2 and summarized in Table 10. Despite good progress on many fronts (as reflected by several indicators), the shortcomings for Outcomes 1 and 2 were significant and overall progress was below the expected level in the view of the TE team, therefore these are rated MU – and therefore the overall Effectiveness rating is MU. The TE acknowledges that much progress has been made, but the work was not completed within the project period and will require follow up action. |
| ONEP & RECOFTC | 31 | General Feedback | While no written comments have been provided by ONEP or RECOFTC, they have provided verbal feedback during the tele-briefing meeting on the TE findings on 19 March 2021, which should be taken into consideration by the TE consultants. | The verbal feedback provided by ONEP and RECOFTC was taken note of during the briefing meeting and revisions were made subsequently to relevant parts of the TE Report.  |