

**Management Response For “Addressing Invasive Alien Species Threats at Key Marine Biodiversity Areas” Project  
20.12.2021**

**Evaluation recommendation 1.** The MTR praises the high level of involvement and commitment of the Project Implementing Partner and appreciates the level of cooperation and trust between the PIU and the IP. However, based on the feedback received by the MTR, all partners, meaning the IP, the PIU, and UNDP could have extended an extra effort to ensure closer, positive, functional and more effective communication with each other. MTR supports one particular IP’s request which is to share all draft technical ToRs and specifications with the IP Coordinator before those are posted for procurement. A reasonable timeframe, like 7 working days, should be established to ensure the IP’s review and feedback. It is also advised that another timeline, around 10 working days, is established for the review and subsequent appraisal of the technical project products by the IP. A joint decision should be made in case third-party technical expertise is required to review a complex product, collect opinions and comments, and work with the author on a harmonized final product. Such expertise, which is meant to implement a “second opinion” approach as requested by the IP, should be made available and budgeted ad-hoc, as appropriate. For this, a standard suggestion is to have a modest contingency budget available throughout the next two years of project implementation.

**Management response: This recommendation is partially accepted. “Second opinion” approach is not accepted by the IP.**

Key Action	Completion date	Responsible unit(s)	Tracking	
			Comments	Status (initiated, completed or not initiated)
1.1 Implementation arrangements and working procedures between the UNDP and IP will be documented and agreed by the parties. In case of disputes over the complex products, key action 2.1 will be applicable.	24.04.2021	UNDP and IP	On April 24 <sup>th</sup> , 2021, a Cooperation Protocol for Implementation Arrangements and Working Procedures was signed between UNDP and DGNCNP that laid down 10 working days for IP’s review and feedback and 15 working days for PIU’s updates.	Completed

**Evaluation recommendation 2.** A need to improve the quality of project technical deliverables and reporting products was communicated to the MTR by the principal project stakeholders. A second opinion approach mentioned above should also be instrumental for harmonizing the product quality expectations with the project timelines, without adding further complexity to the review and appraisal processes that tend to cause project implementation delays. The IP has confirmed the expectation from the project to produce exemplary products and deliver best practices. At the same time, meticulous attention to detail combined with a certain level of micro-management, combined with the ever-changing priorities and pressing external factors contributes to implementation delays,

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complexities and frustrations. In this regard, a reasonable perfectionist approach is deemed appropriate; the project should be guided by the implementation arrangements described in the Project Document and practical implementation scenarios successfully tested with the same Implementing Partner. As a change from business-as-usual, the Implementing Partner is advised to consider giving more authority to the PIU where it concerns event management, PR and media contacts, external communications, issuance of invitations and other routine/regular interaction with the project partners. The IP should empower the PIU for continuous and meaningful stakeholder engagement and communication. Overall, both the IP and the PIU are advised to work out concrete practical solutions aimed to increase efficiency, accelerate project performance and ensure multi-stakeholder ownership of project endeavors and products.

**Management response: This recommendation is accepted.**

Key Action	Completion date	Responsible unit(s)	Tracking	
			Comments	Status (initiated, completed or not initiated)
2.1 In order for empowerment of PIU (meaning UNDP project team) by provision of increased authority and ensuring a reasonable perfectionist approach, and thus to address disputes stemming from micro-management and excessive perfectionism, IP will ensure the issues are elevated to higher level managers for expedited resolution.	24.04.2021	UNDP and IP	On April 24 <sup>th</sup> , 2021, a Cooperation Protocol for Implementation Arrangements and Working Procedures was signed between UNDP and DGNCNP and Article 9 laid down a mechanism for dispute resolution by elevation of issues to the higher-level managers.	Completed

**Evaluation recommendation 3.** All the stakeholders interviewed by the MTR have confirmed the necessity to improve the coordination and collaboration required for project planning and implementation of project activities. The MTR suggests the following areas for improved coordination:

- The MTR notes the coordination of the mainstream national-level effort with the partner EU-funded TerIAS project. According to the IP and GDFA, the two projects work collaboratively. However, the roles of the two projects for policy/regulatory reforms, development of the national IAS strategy and its implementation mechanisms should be clearly defined between the two projects; the impact, limitations and assumptions of both partner projects should be considered as part of adaptive management. The MTR would mildly recommend that the project discusses its role and mandate with both GDNCNP and GFDA (the focal point for both TerIAS and MarIAS) to make sure that the GEF project increment and added value is adequately captured and pronounced through the project publicity and outreach effort. This is also relevant for the joint work of two projects on the draft by-laws on Control and Management of IAS in line with EU legislation; this work has clearly been prioritized and led by the TerIAS project, which is perfectly fine, as long as the GEF increment and value of the MarIAS contribution is adequately captured and presented, at least for the project reporting and outside assessments.
- GDFA, confirmed by the IP as the project's “main and indispensable partner”, should be engaged more meaningfully and effectively. As has been confirmed by GDFA, particular aspects where a more comprehensive approach to cooperation and engagement is required are project planning, decision-making, and fieldwork.
- The project should become instrumental in implementing the IP’s intention and effort to cooperate on inter-sectoral issues within the respective mandates of other DGs. In particular, this refers to the intention of producing national regulations and a joint IAS National Strategy and Action Plan, with the involvement of all relevant DGs and institutes. All three DGs confirmed their

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perception of the project as a locomotive for innovations and best practices, both those that should be brought from elsewhere to increase the national capacities and those that will hopefully be created within this project to be available for other countries.

- In view of the MTR, the Project Steering Committee could potentially provide a platform for intersectoral coordination and technical discussion on the issues around the control and management of marine IAS, at least before the National Technical Advisory Board (NTAB) gets functional. This would require a certain change in the scope and technical expertise required to support the SC decision-making which so far has been limited to project-specific issues only, while the meetings have been convened in a formal manner.

**Management response: Partially accepted. The sub-recommendation of using PSC as the acting NTAB is not legally possible. NTAB has serious functions and roles that PSC cannot replace or be held accountable for.**

Key Action	Completion date	Responsible unit(s)	Tracking	
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3.1 The engagement with the GDFa and other relevant institutions will continue. They have been invited and included to the needed planning, decision-making, and fieldwork. In future consultations, their practical and meaningful engagement will be documented by the M&E function as verification of implementation of Stakeholder Engagement Plan per recommendation 9.	30.10.2023	UNDP, IP		Initiated

**Evaluation recommendation 4.** The MTR recommends that the project accelerates the performance as it concerns the development of the national policy and regulatory framework related to IAS in marine ecosystems, echoing the recommendation of the Project Steering Committee. The MTR emphasizes a need to identify concrete areas for the planned impact as part of the adaptive work planning, based on the ProDoc strategy and the changes in the institutional and regulatory baseline. The MTR recommends that the project team and the IP initiate work with the Ministry of Transport (DG for Maritime), as detailed in the ProDoc, where it concerns ballast water management and control, taking into account changes in the national priorities in response to the IMO directives. The MoTI (GD for Maritime) has confirmed their interest in developing the national ballast water regulations and standards in accordance with best practices, so the project increment can be in finding relevant best practices and working together with the MoTI to apply those to the case of Turkey.

**Management response: This recommendation is partially accepted. Second part of the recommendation regarding initiating work with DG for Maritime where it concerns implementation of Ballast Water Convention is rejected in that DG does not have any plans to work with MarIAS project. DG has indicated to PIU that their guidelines and IMO Standards suffice for the implementation of the Convention. Without their request it will not be possible to initiate such work.**

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4.1 UNDP will accelerate the preparation of the draft regulation with a deadline of 31.12.2021. Stakeholder consultations will be concluded by 31.03.2022 and the draft regulation will be submitted for review by 31.06.2022.	31.06.2022	UNDP, IP			Initiated
<p><b>Evaluation recommendation 5. Adaptive Management.</b> The project claims that no adaptive management elements have been applied during the first 2.5 years of project implementation. This arguably originates from definition differences where it concerns adaptive management. The MTR attempts to record the deviations between the original project Workplan, the yearly workplans for 2019-2021, and takes notice of specific cases of adaptive management that have been applied. The project is advised to use the tool developed by the MTR for further justification and recording of significant changes to the original workplans. This will help strategizing the interventions towards higher efficiency and limit the application of an ad-hoc approach when the project plans and acts mostly in response to "this moment" necessities and concerns.</p> <p><b>Management response: This recommendation is accepted. A new tool will be developed.</b></p>					
Key Action	Completion date	Responsible unit(s)	Tracking	Comments	Status (initiated, completed or not initiated)
5.1 Due to changes in project strategy regarding certain outcomes (i.e Ballast Water Convention) project will go through a log-frame, work-plan and budget revision whose approvals will be finalized by 31.05.2022.	31.05.2022	UNDP, GEF, IP			Not initiated
5.2 UNDP will design an issue log to record output level deviations from annual work plan and provide justifications that will be recorded annually annexed to the PIR.	31.03.2022	UNDP			Not initiated
<p><b>Evaluation recommendation 6.</b> One clear example of adaptive management applied so far is the project’s work and plans related to fiscal incentives. The project should come up with a clear adaptive management scenario in response to the fact that the incentive programs proposed for Water Hyacinth, Lionfish and North Atlantic Starfish will not be accepted and implemented. Since it was decided to prepare a non-fiscal incentive program for the four targeted species (which was not mentioned among the SC decisions or any adaptive management documentation available), an amendment to the project workplan should be prepared and agreed to with the key partners, including GDFa. Lessons learned from the preparation of a fiscal incentive program should be available for the adaptive management planning to ensure full relevance of the newly proposed strategy and the concrete results on the ground.</p>					

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<b>Management response: This recommendation is accepted</b>				
<b>Key Action</b>	<b>Completion date</b>	<b>Responsible unit(s)</b>	<b>Tracking</b>	
			<b>Comments</b>	<b>Status (initiated, completed or not initiated)</b>
6.1 The issue log designed by UNDP under key action 5.2 will also cover the incentive program and its re-design and will be reported in the next PIR.	31.09.2022	UNDP		Not initiated
<p><b>Evaluation recommendation 7.</b> The MTR notes one specific weakness in the project implementation strategy that is a lack of capacity needs assessments and training needs assessments. It is somewhat unclear as to why specific topics for capacity-building activities and trainings are being selected. The project is strongly advised to work with the MoTI on the ballast water management capacity needs assessment as an essential adaptive management element for Outcome 1.5. Based on the results of such a capacity needs assessment, a concrete workplan should be produced, and the indicators showing the capacity changes as a result of the GEF increment should be developed. In case the capacity building increment will be limited solely to eDNA trainings and equipment, an indicator showing the MoTI’s capacity to obtain, analyze, process and use the genetic data for decision-making on the ballast water control where it concerns the IAS contamination vessels’ checkup should be offered as an output-level indicator for the Logframe. The MoTI confirmed their readiness to sit down and discuss a more systematic approach to capacity building under Output 1.5 with the project team.</p>				
<b>Management response: This recommendation is accepted</b>				
<b>Key Action</b>	<b>Completion date</b>	<b>Responsible unit(s)</b>	<b>Tracking</b>	
			<b>Comments</b>	<b>Status (initiated, completed or not initiated)</b>
7.1 A rapid capacity needs assessment will be performed. Trainings will follow this rapid need assessment.	31.06.2022	UNDP, IP, MoTI		Not initiated
7.2 A specific indicator regarding capacity increase of MoTI (DG Maritime) to obtain, analyze, process and use the genetic data for decision-making on the ballast water control where it concerns the IAS contamination vessels’ checkup will be included. Other indicators regarding the implementation of Ballast Water Convention that is beyond the scope of the project will be suggested to be removed.	31.05.2022	UNDP, IP, MoTI, GEF		Not initiated

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**Evaluation recommendation 8.** The project should accelerate Outcome 3 implementation and develop an implementation scenario that will be reflective of the COVID-19 pandemic restrictions related to stakeholder consultations and fieldwork, on the one hand, and will make up for the significant delays in Outcome 3 performance demonstrated so far, on the other. One essential element of the project strategy that raises concerns is the preparation of site-specific IAS management plans, that, according to the ProDoc ToC, were to be developed during the first half of the project. The project team should analyze the reasons behind low delivery and delays, see if a fundamental change of the currently applied top-down approach to intervention planning is required, and come up with an adaptive management strategy for Outcome 3 that will ensure that the project makes up for the delays and complications that have occurred.

**Management response: This recommendation is accepted**

Key Action	Completion date	Responsible unit(s)	Tracking	
			Comments	Status (initiated, completed or not initiated)
8.1 RPA will be signed with an NGO for preparation of management plans	31.02.2022	UNDP and RPA		Initiated
8.2 Draft management plans will be prepared and submitted to the approval of IP.	30.09.2022	UNDP, RPA, IP		Not initiated

**Evaluation recommendation 9.** The project is advised to revise the Stakeholder Engagement Plan and implement a sound strategy towards meaningful engagement of the main national-level partners, the two DGs and the Ministry of Environment, and the site-based project stakeholders, along with NGOs, academia and other secondary stakeholders.

**Management Response:**

**This recommendation is partially accepted in that Stakeholder Engagement Plan will not be revisited as it is of sufficient quality, but its implementation will be more closely followed by the Project team as well as the M&E function.**

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9.1 The PIU will document how Stakeholder Engagement plan is being implemented in practice. For this M&E officer of UNDP will devise a follow-up mechanism	31.05.2021	UNDP		Not initiated.

**Evaluation recommendation 10.** The following recommendations are offered on project co-financing:

- The project should develop a process for yearly confirmation and verification of the project co-financing. Every year, as part of the annual reporting (PIR) exercise, the Project Team should be collecting firm evidence to confirm the co-financing. Copies of evidence should be maintained by the CO for any audit purpose, as well as made available for verification by the independent project terminal evaluation. For the parallel co-financing from sectoral ministries, specific guidance with the relevance criteria should be developed by UNDP CO in cooperation with the sectoral

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stakeholders, to ensure reliability and consistency of reporting and evidence. So far, the MTR can recommend producing a table similar to ProDoc Annex Q with details on GDNCNP contribution, and having it detailed, appraised and submitted officially by GDNCNP.

- One way to ensure meaningful engagement of the key stakeholders is through ensuring parallel co-financing of project activities. So far, the only co-financing partner (apart from UNDP) is GDNCNP. It is the opinion of the MTR that if, for example, the MoTI had concrete co-financing obligations towards the project, that could have been more proactive in collaboration with the project, would take a more active role in defining the project increment and ensuring that the project supports their mainstream activity and provides stimulus and resource where the baseline is insufficient and progress is limited

**Management response: This recommendation is partially accepted. GDCNP co-financing will be reported in suggested format from now on but the other stakeholders have not committed to co-financing at the start of the project and cannot be forced to report on any financing at this late stage in project implementation.**

Key Action	Completion date	Responsible unit(s)	Tracking	
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10.1 GDCNP co-financing will be shared in the next PIR	30.09.2022	UNDP, IP		Not initiated

**Evaluation recommendation 11. A comprehensive assessment of the relevance, value and effectiveness of the project awareness-raising programme is recommended as an add-on to the end-of-project awareness level survey.**

**Management response: This recommendation is accepted and will be integrated into the follow-up survey for the awareness raising activities.**

Key Action	Completion date	Responsible unit(s)	Tracking	
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11.1 One or two specific questions will be added to the already existing question set of the baseline awareness survey to document the relevance and value of the project for citizens and stakeholders in pilot sites	31.02.2023	UNDP		Not initiated

**Evaluation recommendation 12.** The MTR confirms the necessity for up to 18-months project extension beyond the original timeframe. UNDP is advised to consider cash co-financing of USD 200,000 (versus planned cash USD 30,000 and parallel USD 170,000) to cover the extra management costs (PMC) for the additional months once and if the no-cost extension is granted.

**Management response:**

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**This recommendation is partially accepted. NCE will be considered by IP and UNDP but not at this early stage but around 6 months before official project end-date.** The evaluator suggests that UNDP increase its cash assistance to the project from \$30,000 to \$200,000 to compensate for the 18-week adjustment status management expenses. In its current shape, PMC budget will suffice without the need for it.

Key Action	Completion date	Responsible unit(s)	Tracking	
			Comments	Status (initiated, completed or not initiated)
12.1 NCE will be considered and the need for one will be evaluated at least 6 months before the official end date of the project	30.04.2023	UNDP, IP, GEF		Not initiated