

## Management Response to the Terminal Evaluation

**Project Title:** Conservation, management and rehabilitation of fragile lomas ecosystems in Lima.

**# PIMS:** 5845

**GEF Project ID:** 5458

**Fecha de culminación de la Evaluación Terminal:** January 29th

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**Terminal Evaluation Recommendation 1.** As an exit strategy, it is recommended to develop a work agenda with key actors such as MINAM, MEF, the MML and local municipalities that integrate explicit commitments related to the financing of the master plan., the determination of the costs of delimitation, monitoring and management of the ACR and unification of criteria with respect to invasions, in addition to a schedule of transfer of powers from the ministries, which grant powers to the MML to manage and guarantee the security of the ACR.

**Management response: Recomendación partially accepted.** The Metropolitan Lima Regional Government Program (PGRLM) is responsible for financing the ACR Master Plan. This financing, which also covers the physical delimitation, security, surveillance and implementation of the leadership or administration, is already contemplated within the public investment projects proposed by the PGRLM. Since the administration of the ACR falls to the PGRLM, the local municipalities do not have a direct participation in the formulation of the PIPs. However, the PGRLM communicates and receives feedback from each municipality to the projects that correspond to hills that are within its jurisdiction. The PGRLM already has the PIP for the Ancón hills in the approval phase and is advancing with the proposals for the other hills that are part of the ACR. Regarding the transfer of powers to the MML by the ministries to manage and guarantee the security of the ACR, the PGRLM is the Administrator of the ACR and therefore already has the power to exercise the defense of possession of the Natural Area. The unification of criteria regarding invasions is a medium- and long-term action that involves reforms of the criminal code that imply the classification of the criminal offense, sanctions that are made more complex by the current context of the pandemic and the escalation of violence, especially in the Peripheral districts of Lima that coincidentally are those where the hills are located, which have resulted in the request for emergency declaration of Lima and Callao by the Ministry of the Interior.

Key action	Deadline	Responsible	Tracking <sup>1</sup>	
			Status <sup>2</sup>	Comment
1.1 Accompaniment to the PGRLM in the approval of the Master Plan and the implementation of the leadership	March, 2022	SERNANP, MML and project team	Initiated	-
1.2 The ACR security and surveillance plan proposal that can be transferred to the next Municipal administration will be reviewed with the MML.	Feb, 2022	MML and project team	Not initiated	-

**Terminal Evaluation Recommendation 2.** The interviews conducted with the beneficiaries of the project indicate that they want and need to finish implementing the project pending activities (e.g. pigs, fog traps, nurseries, irrigation systems), so it is suggested to look for financing alternatives for them in conjunction with the MML, the municipalities, in order to avoid frustrations of these actors

**Management response: Recommendation rejected.**

Regarding this recommendation, we must specify the beneficiaries of the productive-technological pilot projects:

1. Pig farming without litter, in lomas de Mangomarca (Vizcachera sector). number of distractions and leads to more challenges such as ensuring ownership of the land where they breed and encroachments from the environment that also exert pressure.
2. Regarding fog catchers, irrigation system and fog catchers, in Paraíso (Villa Maria del Triunfo) and Primavera (Carabayllo) there are two implemented pilots, with a lot of potential. During the implementation of the project, 5 areas were prospected (Carabayllo, Collique, Amancaes, Mangomarca, Villa Maria), but only these 2 areas allowed its implementation, mainly due to security conditions and because they are within the scope of the ACR. In the first pilot in Paraíso after completion of the field execution of the fog catcher components, and irrigation systems and connectivity with the nursery, with the capacity to cover the afforestation of 8 afforested hectares, has been added in the last quarter 2021, 2 funds granted by CALIDDA and executed by the NGO GEA implements fog traps, storage tanks and irrigation systems, which expands the irrigation capacity to 40 hectares and a third fund that would be in the process of execution during 2022. For the Carabayllo pilot later After the installation of fog catcher panels, irrigation system and connection to the nursery was completed, the NGO CIDAP made an investment that will help double the mesh collection capacity with more SFC panels, also in the last quarter of 2021 the company CALIDDA is evaluating the possibility of financing equipment similar to that of Lomas de Paraíso in Lomas de Primavera, given that Carabayllo is the company's area of influence and they want to replicate the successful work of Paradise. Thus, there are already alternatives for continuity and financing of actions leveraged and led by CSOs.

<sup>1</sup> Status of implementation is tracked electronically in the Evaluation Resource Centre (ERC).

<sup>2</sup> Select one: Not initiated, Initiated, Completed, Completed, No longer applicable

**Terminal Evaluation Recommendation 3.** MINEM had little involvement in the project, despite its importance in the control of mining activities in the ACR and in the Lomas in general, so it is suggested to establish a specific working table between MINAM-SERNANP-MML-MINEM to avoid new concessions and control the existing illegal mining in the area.

**Management response: Recommendation Partially accepted.**

A joint agenda to prevent new concessions and control legal mining can only be established in the medium term. An important condition to exercise this control is the existence of urban zoning.

The Metropolitan Municipality of Lima still does not have an approved urban development plan, this has allowed the outdated of important layers of information due to the lack of urban zoning in many areas of the districts of Lima. This condition has allowed MINEM, through INGEMMET, to continue granting titled mining rights (Law 27560 regulates mining concessions on urban land and urban expansion) in an urban setting; however, with the Worktable formed, a work plan must be drawn up with priority issues related to illegal mining.

Since 2019, the management of Lima has resumed and promoted the update of the URBAN PLAN to 2040. To date, this plan is still in the process of socialization, but it is not yet in its approval phase and, additionally, the urban zoning needs to be updated. for the 43 districts of Metropolitan Lima.

Key action	Deadline	Responsible	Tracking	
			Comment	Status
3.1 Update of URBAN PLAN to 2040, for the Province of Lima.	June, 2022	MML	The Project participates in the socialization process of the Plan	Initiated

**Terminal Evaluation Recommendation 4.** The experience on the implementation of the project indicates little involvement of key actors such as MEF because – among other causes – the communication of the objectives of the project and its benefits needed concrete messages adjusted for this type of actors. Therefore, it is recommended that for any project that includes policy reforms and establishment of regulations, targeted scenario analysis studies be developed that show the social and economic benefits and costs associated with the continuation of ecosystem management as described in the baseline (business as usual) compared to the change proposed by the specific intervention towards an integrated

**Management response: Recommendation rejected.**

This recommendation would require an action that, since the project is in the closing phase, it is not realistic to contemplate doing it. In the case of EbA Lomas, doing an analysis of scenarios at this point is basically generating a new product that was not contemplated in the project. However, it should be noted that, as part of the requirements for the preparation of the RCA file, a rapid analysis was required to demonstrate the social and economic benefits and costs associated with managing the lomas ecosystem under an RCA regime. Finally, it is up to MINAM to include an analysis of scenarios in the Lomas Action Plan that it is working on. The project has generated an Economic Valuation Study of the SSEE and Lomas Ecosystems that analyzes the different scenarios that have been made available to MINAM to serve as input for the Action Plan.

**Terminal Evaluation Recommendation 5.** Because the Inter-Institutional Protocol does not have operational rules that regulates the responsibilities and actions of the relevant actors, it is suggested that a working group led by MINAM and SERFOR be created to elaborate this regulation and its extended operation for all the Lomas of the country.

**Management response: Recommendation partially accepted.**

1. The purpose of the inter-institutional action protocol is the proprietary defense of fragile ecosystems, given that it provides guidelines and responsibilities especially centralized in SERFOR, which are then transferred to the GORES, in the particular case of Lima SERFOR and MIDAGRI cannot complete the transfer as a sector in the province of Lima, so SERFOR must obligatorily assume these functions.
2. To date, the actions of SERFOR within the framework of the protocol imply administrative procedures to increase the documentary collections of the prosecution, but the defense of possession of the natural heritage implies the management of resources for the interventions and management with the Attorney General's Offices, Specialized Prosecutor's Offices and the National Police of Peru (Ministry of the Interior), to the recovery of areas that are in different stages of intervention (acting in flagrante delicto, extrajudicial recovery, prevention, etc.).

Key action	Deadline	Responsable	Tracking	
			Comments	Status

5.1 Call for a working meeting with SERFOR to review the state of progress of the protocol, bottlenecks for operationalization and possible next steps to be followed	March 2022	MINAM-SERFOR	At the request of the Government, support will be given to facilitate this meeting from UNDP	Not initiated
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<b>Terminal Evaluation Recommendation 6. It is recommended that UNDP, in its capacity as a representative agency of the UN and implementer of GEF projects, can convene and lead these coordination efforts between the different ministries to promote the agenda for the protection of the Lomas, both those of Lima and those of the country.</b>				
<b>Management response: Recommendation partially accepted.</b>				
<b>This is a medium or long-term action.</b>				
<ol style="list-style-type: none"> <li>1. It is necessary to specify that during the first and second semesters of 2021, valuable efforts have been made between MINAM, civil society and local and regional governments to build an Action Plan for Lomas Costeras.</li> <li>2. It corresponds to the authorized public entities to lead the multisectoral coordination processes. UNDP may accompany and provide technical assistance to public entities to the extent that they request it.</li> <li>3. SERFOR is responsible for convening and continuing to implement the guidelines or regulations to promote the protection of the Lomas. For its part, MINAM, approve the Coastal Lomas Action Plan, in order to have tools that allow SERFOR to articulate actions for the protection of said ecosystems.</li> </ol>				
Key action	Deadline	Responsable	Tracking	
			Status	Comments
6.1 At the request of the Government, accompaniment of UNDP (environmental portfolio) to MINAM in socializing the action plan of Las Lomas to GORES as part of the UNDP environmental agenda.	June, 2022	SERFOR, y MINAM and UNDP	Not initiated	

**Terminal Evaluation Recommendation 7.** There is a rich archaeological and cultural heritage in Lomas, so it is recommended the establishment of a cooperation agreement between MML and MINCUL to protect this heritage

**Management response: Recommendation accepted.**

1. There are already agreements between the MML and the MINCUL related to urban cultural and archaeological heritage, but not related to those found in the hills.
2. In the year 2012 with the Mayor's Decree No. 001, Lima is declared as a millenary city, where it is also prioritized and forms part of the policy axes of the Municipal management 2011-2014, in the efforts that have happened to Metropolitan Lima those commitments have not been prioritized.
3. An agenda for the future between the Metropolitan Municipality of Lima and MINCUL that includes the protection of heritage in hills is new and could be included in the framework of the URBAN PLAN to 2040. New evidence has been collected through the EbA Lomas project of the existence of archaeological sites in ecosystems of hills that can serve as input to propose future investment projects for the enhancement of the hills, but with a cultural landscape approach that generates value and identity, and at the same time allows the implementation of infrastructure of service for citizen access to all this evidence.

Key action	Deadline	Responsible	Tracking	
			Status	Comments
7.1 Identify with the MML their willingness to include Las Lomas in a framework agreement or other agreements that they already have with the MINCUL.	Feb, 2022	MML	Not initiated	

**Terminal Evaluation Recommendation 8.** It was detected that in the Prodoc there was a district municipality that committed about 90% of the total co-financing, which was not fulfilled. Therefore, it is recommended that future projects carry out a more exhaustive review of the feasibility and realism of these commitments, in order to avoid commitments that cannot subsequently be fulfilled.

**Management response: Recommendation accepted.**

The process of identifying the sources of co-financing for the EbA Lomas project was not similar to that of other projects that have been executed by UNDP. Given the short term to prepare the ProDoc and the fact that a proposal was being worked on that initially contemplated such co-financing coming from a single source (the MML), it was necessary to resort to local governments to identify the bulk of the co-financing. However, the execution of these commitments was subject to various circumstances, fragility of the local governments in turn, since it was seen that the vast majority of them went through changes of authorities (Environmental Managers) and even Mayors, causing the commitment assumed by the vacated authorities was no longer assumed by those who replaced them. Subsequently, there was a change of management, and then the process of electing new authorities took place.

Key action	Deadline	Responsible	Tracking	
			Status	Comment
8.1 Incorporate more comprehensive commitment verification means analysis into the co-financing identification process where possible. For example, the means to prove some investment commitments can be corroborated in the MEF's project bank.	Permanent	UNDP	Initiated	-
8.2 Promote more diversified co-financing for future GEF projects supported by UNDP	Permanent	UNDP	Initiated	-
8.3 Ensure compliance with the monitoring procedures through annual monitoring in the framework of the PIR exercises and the mid-term and final evaluations.	Permanent	UNDP	Initiated	-

**Terminal Evaluation Recommendation 9. For the design of future UNDP projects, it is recommended to pay attention to the preparation of the SESP in a way that correctly reflects the risks of the projects. It would be advisable for the SESP to be made by a third party independent of the person or team that prepares the project, with the aim of improving the objectivity of this analysis.**

**Management response: Recommendation accepted.**

During the formulation stages of the PRODOCs, UNDP seeks to involve the stakeholders of the project in the identification of environmental and social risks, who are often the ones who know them best, through validation workshops. Efforts will be made to incorporate specialists other than the PRODOC trainers into the formulation of the SESP. Currently, the SESP is permanently monitored and updated (at least once a year) as part of the PIR exercise and quarterly.

Key action	Deadline	Responsible	Tracking	
			Status	Comment
9.1 Where possible, incorporate a SESP specialist into the PROOC formulation team to ensure the objectivity of the project's risk analysis	Permanent	UNDP	To start	-
9.2 Continue involving the interested parties in the identification of social and environmental risks of the project through validation workshops of the PRODOCs	Permanent	UNDP	In progress	-
9.3 Monitor the SESP and project risks by updating the Risk Log of the atlas on a quarterly basis, as well as within the framework of the annual PIR exercises	Permanent	UNDP	In progress	-

**Terminal Evaluation Recommendation 10.** Related to the above, it is advisable not to introduce an exaggerated number of indicators to a project and in addition, the use of IRRF indicators should be avoided, since the use of UNDP global indicators does not seem to be a good tool to monitor projects with eminently local actions. Finally, these parameters and the strategy should be analyzed and updated during the initiation phase of the project (within the first 6 months) with the participation of the relevant actors.

**Management response: Recommendation partially accepted.**

1. Indeed, it was seen that the excess of indicators of the project tends to cause the information reported to result between one indicator and another.
2. The change of indicators, parameters and implementation strategies must be made more flexible, in the inception phase, mid-term or at any time of the existence of the projects, as long as all the relevant actors of the Project agree.
3. The use of UNDP global indicators in the project results framework cannot be avoided, as it is mandatory in the standard template of PRODOC.

Key action	Deadline	Responsible	Tracking	
			Status	Comment
10.1 Incorporate a validation procedure of the strategy and results framework of the project in the inception phase (during the first 6 months) with the participation of the key actors	Permanent	UNDP	To start	-
10.2 Continue with the revisions of the Theory of Change and Strategy of the projects in the framework of the Mid-term Evaluations of the projects	Permanent	UNDP	In progress	-