



1. Project Data

Project ID P128437	Project Name ABNJ - Oceans Finance Facility - GEF	
Country World	Practice Area(Lead) Environment, Natural Resources & the Blue Economy	
L/C/TF Number(s) TF-18233,TF-18234,TF-18235,TF-18236,TF-18237	Closing Date (Original) 31-Dec-2018	Total Project Cost (USD) 7,850,930.82
Bank Approval Date 17-Nov-2014	Closing Date (Actual) 31-Dec-2018	
	IBRD/IDA (USD)	Grants (USD)
Original Commitment	9,174,310.00	9,174,310.00
Revised Commitment	7,850,930.82	7,850,930.82
Actual	7,850,930.82	7,850,930.82

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2. Project Objectives and Components

a. Objectives

According to the Project Appraisal Document (PAD) (p. 12) and the Financing Agreement of November 17, 2014 (p. 4) the objective of the project, Ocean Partnership for Sustainable Fisheries and Biodiversity Conservation (P128437) was “to catalyze investments into selected transformational public-private partnerships that mainstream the sustainable management of highly migratory stocks spanning areas within and beyond national jurisdictions.”



According to the project paper (p. 7) during the project restructuring on August 6, 2018 the project's objective was changed to "identify potential investors and develop business cases that promote the sustainable management of shared highly migratory fish stocks spanning areas within and/or beyond national jurisdiction". Therefore, this validation will conduct a split rating.

The project paper (p. 7) stated that to "develop business cases" was defined as to create a proposal that outlines an investable opportunity that promotes sustainable management of fisheries in areas beyond national jurisdiction (ABNJ). "To identify potential investors" was defined as to pitch to interested private or public-sector investors and entrepreneurs developed business cases, with the intention of eventually having these investors finance the business cases.

b. Were the project objectives/key associated outcome targets revised during implementation?

Yes

Did the Board approve the revised objectives/key associated outcome targets?

Yes

Date of Board Approval

08-Aug-2016

c. Will a split evaluation be undertaken?

Yes

d. Components

Component 1: Definition and development of business cases for long-term transformational pilots for sustainable fisheries in priority ocean areas (appraisal estimate US\$5.76million, actual US\$4.84million): This component was to be implemented by four regional Executing Agencies (EA). Each regional sub-project was to undertake the prioritization, analysis and development of business plans for pilot projects to address more effective management of fisheries on shared highly migratory stocks occurring within developing coastal and island states' exclusive economic zones (EEZ) and adjacent Area Beyond National Jurisdiction (ABNJ). The business plans were to offer the potential for relatively rapid transformation towards sustainable and responsible fisheries. In the context of this project, such transformation can be characterized as a combination of three principal benefits: economic efficiency, biodiversity conservation / ecosystem health, and social equity.

The design process for the pilot business plans was to be disseminated widely throughout the region, through the respective EA's active engagement in discussions on shared stocks management with regional stakeholders. These were to include: public and private sector actors from a range of Bank client countries-essentially inter-ministerial committees and other appropriate stakeholder groupings, and regional fishery bodies with a mandate for conservation and management of these stocks.

According to the project paper (p. 7) during the project restructuring the title of component 1 was revised to read "definition and development of business cases for long-term transformational pilots for sustainable fisheries in priority ocean areas". The ICR (p.9) stated that the change in the terminology also indicated the reduction of the scope of the output since "business cases" implied business/project concepts while



“business plans” were further developed. The project paper (p. 6) stated that project activities were not to be altered through the project restructuring.

Component 2: Innovation grant facility (appraisal estimate US\$2.16million, actual US\$2.07million): This component was to be led by Conservation International (CI) under a Grant Agreement with the Bank and in partnership with each of the four regional EAs outlined above in Component 1. Grants were to support a range of innovative activities focused on improved management of shared highly migratory fisheries that were to contribute in parallel to the effective delivery of Component 1 and the project’s PDO. These activities were to include: i) conducting analyses/evaluations to inform fisheries management decisions; ii) field test new fishing gears or technologies, including for fisheries monitoring, control and surveillance (MCS); and iii) coordinating regional and global workshops/exchanges and networking to build capacity and share experiences and lessons learned.

Component 3: Inter-Regional Coordination, Implementation Support and Monitoring and Evaluation (appraisal estimate US\$1.25 million, actual US\$0.94 million): This component was to provide parallel support for components 1 and 2 in the following areas:

1) Global Think-Tank: A Global Think-Tank (GloTT) was to establish and operationalize the GloTT (ICR, para. 9). The GloTT was meant to foster inter-regional coordination, outreach and collaboration between the four regional sub-project activities. The think-tank was to comprise the four regional EAs together with Conservation International (CI) as EA for the innovation facility, a multidisciplinary group of thematic specialists, Global Environment Facility (GEF), and the Food and Agriculture Organization (FAO). The GloTT was to provide space in which regions could come together to discuss sustainable management of shared highly migratory stocks and conservation of associated ecosystems and species. Agreement will be reached at the first GloTT meeting on a shared regional agenda covering (a) exchange of experiences and learning associated with regional sub-projects’ pilot design and planning process; and (b) south-south awareness, capacity building and knowledge sharing on theory and practice of shared highly migratory fisheries.

2) M&E tools: This area was to design and deploy tools and approaches (including the Bank’s Fisheries Performance Indicators - FPI) to enable effective benchmarking of performance and progress against agreed targets. Also, pilot projects successful in securing external finance during the project’s lifetime, ensuring appropriate lessons learned and disseminated were to be informally monitored.

e. Comments on Project Cost, Financing, Borrower Contribution, and Dates

Project Cost: According to the PAD (p. 7) the project was estimated to cost US\$9.17 million. The ICR (p. 2) stated that the actual cost was US\$7.85 million.

Financing: The project was financed by five different Trust Funds: i) TF-18247 (US\$1.50 million of which US\$626,135 was disbursed); ii) TF-18235 (US\$1.36 which was completely disbursed); iii) TF-18234 (US\$2.16 million of which US\$2.06 million was disbursed); iv) TF-18233 (US\$2.19 million of which US\$1.89 million was disbursed); and v) TF-18236 (US\$9.17 million of which US\$7.85 million was disbursed).



Borrower Contribution: According to the PAD (p. 7) the Borrower was not to make any contributions.

Dates: On August 6, 2018, the project was restructured to (Project Paper p.7-10): i) change the PDO from “to catalyze investments into selected transformational public-private partnerships that mainstream the sustainable management of highly migratory stocks spanning areas within and beyond national jurisdictions” to “identify potential investors and develop business cases that promote the sustainable management of shared highly migratory fish stocks spanning areas within and/or beyond national jurisdiction.” According to the ICR (p. 8) the change in the PDO reflected a reduction in the scope of the project by removing the reference to “catalyzing investment” (which had always been a long-term goal and was not envisioned to be achieved during the implementation period). Also, the original PDO included language that was difficult to operationalize and measure. ii) change in Results Framework to better align with the revised PDO; and iii) change the title of component 1 to “definition and development of business cases for long-term transformational pilots for sustainable fisheries in priority ocean areas” indicating a reduction of the project’s scope.

The project closed on its original closing date of December 31, 2018.

3. Relevance of Objectives

Rationale

The PAD (p. 8) stated that a report by the Food and Agriculture Organization (FAO) in 2012 found that seafood has a first-sale value of more than US\$190 billion per year and is amongst the most globally traded food commodities, accounting for some 10 percent of total agricultural exports. Seafood exports from developing countries are particularly important. In 2009, they accounted for over US\$25 billion per year and were substantially higher than other agriculture commodities such as rubber, cocoa, bananas, and coffee. However, factors such as an increasing human population, climate change, economic acceleration and associated demand for seafood and other ocean resources all have a negative impact on the sustainability of fisheries. As a result, the fishing sector faced several challenges such as levels of overcapitalization, overexploitation, illegal activity and negative spillover impacts on biodiversity and ecosystem services.

In order to address these challenges, the Bank decided to re-engage in supporting sustainable fisheries in 2004. The Bank also aimed to assist client countries to invest in systematic improvements in managing their coastal fisheries (fisheries within national jurisdictions). While many of the fish stocks that are economically important to developing countries fall within such national jurisdictions, the ‘shared highly migratory stocks’ such as tunas, billfishes, and sharks- are trans-boundary. These fish stocks shared with neighboring coastal developing states and/or with distant water fishing nations operating within ‘areas beyond national jurisdiction’ or area beyond national jurisdiction (ABNJ). Due to their trans-boundary nature, the management of fisheries on such stocks represents a particularly complex management challenge.

The project was one of four, funded under a new Global Environment Facility-funded global ABNJ Program and led by FAO.

According to the ICR (p. 5) the Bank has been increasing its engagement in the fisheries sector since 2004. The Bank’s fisheries strategy focused on creating sustainable wealth through stronger fisheries



governance, identifying successful pathways to reform, clarifying the role of the public and private sector in sustainable fisheries, designing and evaluation market systems, and defining and applying best practice business models for fisheries.

During the project restructuring in August 2018 (six months before project closing) the objective was revised. According to the ICR (p. 10) the new objective focused on the development and presentation to investors of business cases rather than business plans, and therefore reducing the scope of the objective. However, the ICR stated that business cases were clearer and easier to measure to avoid attribution problems.

The original and revised objectives were in line with the Global Program on Fisheries (PROFISH), which the Bank initiated in 2005. According to its strategic vision (p. 8) the program aimed to define Policy Frameworks for Economic Growth, Poverty Reduction, Food Security, Gender Equity, and Climate Change Resilience by creating sustainable wealth through better fishery governance using well-designed rights and responsibilities and regulatory reform. This strategy meant to strengthen food security and improve nutrition and climate change resilience, which ultimately helps increase economic growth and decrease global poverty.

In 2018, the Bank initiated with development partners PROBLUE, a new Umbrella Multi-Donor Trust Fund (MDTF), that supports healthy and productive oceans. The initiative focuses on four key areas: i) the management of fisheries and aquaculture; ii) the threats posed to ocean health by marine pollution, including litter and plastics; iii) the sustainable development of key oceanic sectors such as tourism, maritime transport and off-shore renewable energy; and iv) building the capacity of governments to manage their marine and coastal resources in an integrated fashion to deliver more and long-lasting benefits to countries and communities, including the role of nature-based solutions to climate change.

The project's objective supported the Bank's corporate goals of reducing extreme poverty and increasing shared prosperity by aiming to preserve the livelihoods of people dependent on fish resources.

Overall, given the objective's alignment with the Bank's as well as the development partner's fisheries and ocean strategies, the relevance of objective is rated Substantial.

Rating

Substantial

4. Achievement of Objectives (Efficacy)

OBJECTIVE 1

Objective

To catalyze investments into selected transformational public-private partnerships that mainstream the sustainable management of highly migratory stocks spanning areas within and beyond national jurisdictions.



Rationale

The project's theory of change envisioned that project activities such as establishing a Global Think Tank for knowledge sharing, applying fisheries performance indicators to measure performance, developing business plans, sharing best practices for sustainable fisheries development, and building capacity to participate in sustainable management of shared highly migratory fisheries in international fora were to result in outputs such as the satisfactory completion of business plans and the development of a mechanism for regional action was to result in the outcome of catalyzing investments into selected transformational public-private partnerships that mainstream the sustainable management of highly migratory fish stocks spanning areas within and beyond national jurisdiction.

According to the ICR (p. 6) the following assumptions were made: i) attractive investment opportunities were identified and the project's EA have sufficient capacity to develop complete business plans; ii) third-parties finance business plans once developed; iii) regional action results in favorable environment for investment; iv) business plans correctly identified opportunity for sustainable management of fisheries. The PAD did not include these assumptions.

The ICR stated (p. 11) that there is no evidence that any outcome was achieved under the project's original objective, which was valid for 44 out of 48 months of project implementation. Therefore, the rating of the achievement of the project's original objective is Negligible.

Rating

Negligible

OBJECTIVE 1 REVISION 1

Revised Objective

Identify potential investors and develop business cases that promote the sustainable management of shared highly migratory fish stocks spanning areas within and/or beyond national jurisdiction

Revised Rationale

According to the restructuring paper (p. 7) the project's theory of change envisioned that the project was to create business cases that promote sustainable management of ABNJ fisheries and that were to attract third-party investor attention.

Outputs:

- According to the Bank team (May 26, 2020), the project produced outputs such as meetings, workshops, and presentations to investors during and after the preparation of business cases. The ICR did not provide any information about how many events were organized and who attended these events.
- Four regional grants and participatory analyses for improved management of shared highly migratory stocks were conducted in all four project regions.
- A grant funding and disbursement mechanism was established and operational.
- Criteria for business cases were agreed upon by the Project Steering Committee, achieving the target of criteria being agreed upon.



- Five technical analyses and capacity building activities related to preparation of business cases for shared highly migratory fish stocks were carried out, not achieving the target of five technical analyses or capacity building activities.
- Economic, social, and environmental cost-benefit analyses of business cases were carried out for all submitted business cases, achieving the target of all these analyses being conducted for all submitted business cases.
- 24 demand-driven activities were completed, validated, and disseminated regionally, surpassing the target of 16 activities. According to the Bank team (May 26, 2020) these activities included policy analyses and business planning, field tests, and sub-regional capacity-building and knowledge exchange events.
- A GloTT was established and is operational, achieving the target of being established and operational. The GloTT, as a knowledge facility within the project, supported EAs in delivering satisfactory business cases by the end of the project closure, by providing deep technical knowledge and support. Also, the GloTT, which included a group of globally acclaimed experts, generated and disseminated focused knowledge on improving ABNJ fisheries globally, by developing and presenting various reports and academic papers.

Outcomes:

- Six of the developed business cases were presented to potential investors, surpassing the target of four developed business cases being presented to potential investors.
- 13 business cases were developed, surpassing the target of four business cases. Also, 10 business cases were judged to have met the minimum criteria. According to the ICR (p. 17), the submitted business cases included some innovative ideas for actively engaging private capital and businesses such as including proposals for extending the successful Parties to the Nauru Agreement Vessel Day Scheme to other fisheries in the Pacific region. Also, the proposals included a sustainable development fund to mobilize public and private capital and existing knowledge and expertise for innovative enterprises, the application of a business case approach to typically public-dominated investments in the fisheries sector, and incentive mechanisms for managing fishing capacity and effort through market mechanisms. The ICR stated that through this collaboration with the private sector, the project was able to confirm interest among investors in the business side of sustainable fisheries management. Also, possible next steps were identified and further development of the project's business cases into business plans by potential investors might prove the concept and result in replications of the project's model.
- Eight new targeted initiatives to increase capacity of member states to participate in the work of Regional Fisheries Management Organizations (RFMOs) were developed, surpassing the original target of four events and the revised target of two events.
- According to the ICR (p. 16), the EAs performed many activities intended to improve capacity and strengthen participation in existing international management regimes for trans-boundary fisheries. For example, the Food and Agriculture Organization (FAO) used project financing to provide a mechanism for Grenada to comply with its billfish quota requirements to the International Commission for the Conservation of Atlantic Tuna (ICATT). The Caribbean Billfish project provided support in the development and implementation of several data management and information tools that are intended to enhance the generation and sharing of billfish data across the region. Also, the project catalyzed the establishment of a consortium for Billfish Management and Conservation (CBMC) composed of private sector, NGO, government, and regional management body representatives to facilitate



increased inter-regional cooperation and coordination. Furthermore, the project supported the drafting of a regional Billfish Management and Conservation Plan.

- The ICR (p. 16) stated that in the Eastern Pacific Ocean, another EA, the World Wildlife Fund (WWF) was able to engage with 22 member countries of the IATTC as well as 200 industry members (representing at least two thirds of purse seine vessel owners in the Eastern Pacific Ocean). Also, the Bay of Bengal Programme Inter-Governmental Organization worked with the Indian Ocean Tuna Commission and hosted dozens of workshops, training courses and authored reports, which aimed to increase compliance with their requirements and build capacity in fisheries management. Furthermore, the Forum Fisheries Agency (FFA) cooperated with member countries to continue building capacity and strengthen existing interregional cooperation practices.

Revised Rating
 Substantial

OVERALL EFFICACY

Rationale

According to the ICR the project did not produce any outputs or outcomes under the original objective. Therefore, the achievement of the original objective was Negligible. The achievement of the revised objective was Substantial due to several achievements such as presenting business cases to potential investors and developing business cases as stated in the project’s objective.

Overall Efficacy Rating
 Modest

Primary Reason
 Low achievement

5. Efficiency

Economic Efficiency:

Both, the PAD and the ICR did not conduct a traditional economic analysis. The PAD (p. 21) stated that due to dispersed and indeterminate nature of future pilots within the four target regions conducting a precise economic or financial analysis would be challenging. The PAD provided a descriptive overview of the overall economic aspects and importance of the fishery sector. For example, it stated (p. 21) that fisheries resources yield annual harvests in the order of 85 million tons with a gross ‘first landing’ value of around US\$80 billion. Also, the fisheries sector provides employment, direct and indirect, to more than 120 million people as well as food and food security to more than 2 billion many of whom reside in developing countries.

The ICR (p. 13) mainly discussed operational efficiency.

Operational Efficiency:



According to the ICR (p. 13) the project experienced cost savings (approximately US\$936,000) in the delivery of the GloTT under component 3 due to an EA being able to obtain pro-bono technical experts. The ICR compared the production of 290 reports at an average cost of US\$27,069 with the cost of US\$42,800 per report under the European Neighborhood and Partnership Instrument East Countries and Second Forest Law Enforcement and Governance Program (ENPI East Countries FLEG II) and US\$32,500 per report under the Regional Governance and Knowledge Generation project. Also, the project results were achieved at a 15 percent lower cost than originally planned (ICR, para. 30).

The project experienced several implementation delays due to the Executing Agency’s (EAs) inexperience with the Bank’s procurement and financial management procedures, the frequent turnover of procurement specialists within the Bank team, and the complexity of the project’s design, which involved five different EAs. According to the ICR (p. 14) in addition to implementation delays, these challenges resulted in duplication of activities. Furthermore, the project experienced delays in developing criteria for business cases, which were only delivered at the project’s Mid-Term Review (17 months before project closure), not giving sufficient time to be used as envisioned.

While the project experienced cost-savings, given the lack of an Economic analysis and the delays in project implementation, the project’s efficiency rating is Modest.

Efficiency Rating

Modest

a. If available, enter the Economic Rate of Return (ERR) and/or Financial Rate of Return (FRR) at appraisal and the re-estimated value at evaluation:

	Rate Available?	Point value (%)	*Coverage/Scope (%)
Appraisal		0	0 <input type="checkbox"/> Not Applicable
ICR Estimate		0	0 <input type="checkbox"/> Not Applicable

* Refers to percent of total project cost for which ERR/FRR was calculated.

6. Outcome

The relevance of the original objective was Substantial. Efficacy was Negligible and Efficiency was Modest. Taking everything together, this results in an Unsatisfactory outcome rating.

The relevance of the revised objective was Substantial. Efficacy and Efficiency were Modest. Taking everything together, this results in a Moderately Unsatisfactory outcome rating.

According to the IEG/OPCS harmonized guidelines, when a project’s objectives are revised, the final outcome rating is an average of outcomes before and after the revision of objectives weighted by Bank disbursements



under each set of objectives. In this project 71 percent of disbursement occurred under the original objective and 29 percent under the revised objective.

Based under the original objective with an outcome of Unsatisfactory (score of 2) and a disbursement weight of 0.71 the weighted outcome score is 1.42.

Based under the revised objective with an outcome rating of Moderately Unsatisfactory (score 3) and a disbursement weight of 0.29 the weighted outcome score is 0.87.

The combined weighted average outcome score is 2.29, which corresponds to an Unsatisfactory rating.

	Before Restructuring	After Restructuring
Relevance of Objective	Substantial	Substantial
Efficacy	Negligible	Modest
Efficiency	Modest	Modest
Outcome Rating	Unsatisfactory	Moderately Unsatisfactory
Numerical Value	2	3
Cumulative Disbursement	US\$5.54 million	US\$2.31 million
Share of Disbursement	0.71	0.29
Weighted Value	1.42	0.87
Final Outcome Rating	Unsatisfactory (1.42 +0.87) = 2.29	

- a. **Outcome Rating**
 Unsatisfactory

7. Risk to Development Outcome

The project's outcome risks can be categorized into two broad categories:

Financial: There is a risk that investors will not remain interested in the business cases and invest somewhere else. Especially since investors had not actually committed themselves to invest in the business cases since the business cases did not include critical details unlike business plans, which include sufficient details (ICR, para. 66).

Technical: Since the business cases did not include important details such as an analysis of the economic and financial viability of the cases, it is possible that they turn out not to be a worthwhile investment (ICR, para. 67).

8. Assessment of Bank Performance

- a. **Quality-at-Entry**



According to the PAD (p. 20) the Bank team identified relevant risk factors, which were all rated Moderate or Low. These risks included, for example, the risk of achieving political and private sector commitment to reform processes such as transitioning towards new forms of fisheries management involving allocative processes. According to the PAD (p. 21) during project preparation, emphasis was placed on identifying high potential opportunities (such as potential to build on existing political commitment, investment opportunities and opportunities for biodiversity 'quick wins'). The project aimed to manage this risk by building on these efforts made during preparation.

Another identified risk was related to the asymmetry of interest between Bank clients and Distant Water Fishing Nation due to the nature of respective investments, and the different consequences of sub-optimal shared fisheries management on those two classes of users. The project tried to mitigate this risk through the pilot design processes and associated regional outreach to contribute to discussions and visioning on collective action management at scale that might place constraints on high seas (ABNJ) fishing.

In addition, the risk of livelihoods loss as a result of reduced fishing effort was identified. Overcapitalization in many fisheries was identified as a serious global problem, impacting sustainable socio-economic benefits and livelihoods. Therefore, there was a risk that future pilot investments were to involve forms of capacity reduction through, for example, vessel buy-back schemes, or decisions on caps and quota allocations in target fisheries, which were to result in some reduction on jobs. The Bank aimed to mitigate this risk by managing the pilot business planning process through taking appropriate safeguards measures whose specificity were to be assessed on a case by case basis during implementation and once the nature of each business plans became clear. Where small scale fisheries were to be involved such as the Bay of Bengal and Caribbean, the project was to ensure that effective and equitable co-management / collective action arrangements were to be internalized in the pilot business plans. According to the Bank team (May 26, 2020) the project was able to mitigate these risks successfully.

The Bank did not identify the risk of EA lacking knowledge of Bank procedures resulting in financial management and procurement issues (see section 10b for more details).

However, according to the ICR (p. 18) the Bank team had limited experience in investment operations, which resulted in design shortcomings such as the inclusion of five EAs (with less than \$2 million per EA on average) in three Bank regions, despite substantial supervision needs. This shortcoming was exacerbated by limited involvement of the country officers in question and by the anchor (now global) unit. Also, the project's objective was overly complicated, and the connection between the different components was unclear. In regards to component 2 the selected intermediate outcome indicators "policy analyses and business planning" (target: 6 activities), "field tests" (target: 4 activities), and "sub-regional capacity-building and knowledge exchange events" (target: 6 activities). These prescriptive targets were not suited for a demand-driven innovation support component as described in the PAD, as the balance between policy analyses and field tests could not be predicted before implementation. This hampered and delayed the activities of Component 2 (along with EA-specific delays and procurement issues) that could only be solved with restructuring.

In addition, the Bank team (May 26, 2020) stated that the importance of familiarity and close support for World Bank procurement and financial management practices was not fully comprehended, leading to significant delays and misunderstandings regarding how such a project could be operationalized. Also, the fundamental concepts for what outputs and outcomes could be expected, as articulated by the PAD,



were unclear and at times contradictory. The purpose of a “business plan” and its relationship to “pilots” was not well defined and required several years of work with the EAs to fully flesh out and operationalize. Similarly, whether or not these business plans could or should be expected to attract financing was entirely unclear: While the original RF clearly identifies “increased investment” as an objective of the project (PDO indicator one), the PAD (p. 15) states repeatedly that “...investments in pilots are outside the scope of the project...”.

Finally, the Results Framework had several shortcomings such as the PDO indicators being vague and not linked to the objective.

According to the ICR (p. 23) the Bank team did not address gender concerns sufficiently. The project would have benefited from not just focusing on fishing interventions, which are mainly male dominated, but also highlighting downstream activities such as fish marketing and processing, which also include women.

Quality-at-Entry Rating

Unsatisfactory

b. Quality of supervision

According to the ICR (p. 21) the project experienced a high turnover of key team members such as Task Team Leaders and procurement specialists. The ICR (p. 19) stated that the Bank team conducted five supervision missions. However, ICR interviews with the EAs indicate that additional missions had taken place but no written documents were recorded. Also, the ICR (p. 19) stated that the Bank’s supervision was negatively impacted by the inadequacy of the supervision budget, which made adequate supervision across three Bank regions challenging. The limited supervision negatively impacted the fiduciary aspects of the project where more intense supervision would have been needed due to the EA’s limited experience in Bank fiduciary procedures. Furthermore, the Bank team never included a safeguard specialist resulting in insufficient support for EAs, which lacked experience to fulfill the requirements of the ESMF for the submitted business cases (see section 10a for more details).

According to the ICR (p. 20) the Bank provided limited support for structuring and designing the content of business cases developed under the project. This resulted in different implementations across EA teams. The Bank attempted to develop some guidelines but these efforts were delayed and some practical minimum criteria were developed during the Mid-Term Review. However, by then it was too late for them to provide guidance. Furthermore, the Bank provided limited feedback on submitted business cases resulting in issues related to quality and social and environmental impacts.

While the Bank project restructured the project to make the objective and Results Framework clearer and better aligned, the restructuring only took place four months before the project’s closing date.

The Quality at Entry included several significant shortcomings such as overly ambitious project scope, the project’s objective was overly complicated, and the connection between the different components was unclear. The quality of supervision also had several significant shortcomings including limited Bank



supervision, the Bank team lacking a safeguard specialist and a very late project restructuring. Taking everything together, the overall Bank Performance Rating is Unsatisfactory.

Quality of Supervision Rating

Unsatisfactory

Overall Bank Performance Rating

Unsatisfactory

9. M&E Design, Implementation, & Utilization

a. M&E Design

The PAD did not explicitly define a theory of change (ToC) as it was not a corporate requirement when the project was appraised. However, the ICR reconstructed the project's ToC and it was largely logic how key activities and outputs were to lead to the intended outcomes. The original project objective was overly complicated and not clearly specified. The revised project objective was sufficiently clear. However, the project's original Results Framework had several shortcomings such as the first PDO indicator ("Increased investment in sustainable fisheries on shared highly migratory stocks") being vague, not easily measurable and difficult to attribute to project activities. Also, the second PDO indicator ("improved ability of client states to engage effectively in regional/international policy processes") was not specifically linked to the objective and the third PDO indicator ("increased interregional cooperation") was vague, overlapped with several intermediate outcome indicators, and tried to measure an outcome that the project did not aim to achieve (increased cooperation between OPP-EAs).

During the project restructuring in August 2018 the wording of all three PDO indicators was revised and their targets were decreased. Also, the wording and target of several intermediate outcome indicators were revised. While some of the new indicators were better linked to the PDO, and were more concise, and measurable, the Results Framework still included Intermediate Outcome Indicators with unclear connection to the PDO. For example, the establishment and operationalization of the GloTT or demand driven activities being completed, validated and disseminated regionally. Also, the selected indicators focused on the delivery of outputs and did not sufficiently measure the quality aspect of these outputs.

According to the PAD (p. 157) EAs were to allocate M&E specialist with responsibility for appropriate systems and tools to ensure systematic collection, compilation of relevant M&E assessment data to allow an effective level of performance measurement against agreed targets.

b. M&E Implementation

According to the ICR (p. 22) M&E data was collected on an irregular basis, lacked a systematic approach and a clear timeline for deliverables. Also, data collection depended on EA's self-reporting due to the lack of financial resources that would have allowed for more intense Bank support. Therefore, the project was



not able to quantitatively or qualitatively assess progress in developing business cases and the quality of reports linked to these cases (ICR, para 56).

As stated above, the Results Framework was revised during the project restructuring in August 2018. However, the ICR (p. 22) stated that due to the limited time available until project closure (17 months) there was not sufficient time to implement adequate M&E (ICR, para. 57).

c. M&E Utilization

According to the Bank team (May 26, 2020) the M&E systems, as designed, were inadequate to collect all necessary information to inform project management and decision-making. Despite this shortcoming, the limited available information was used by both, the EAs and Bank team, to assess progress towards the achievement of the objective (ICR, para. 58).

Overall, the shortcomings in M&E design such as the objective being overly complicated and not sufficiently specified, as well as the lack of regular data collection during implementation resulted in an Negligible M&E quality rating.

M&E Quality Rating Negligible

10. Other Issues

a. Safeguards

The project was classified as category B and triggered the Bank's safeguard policies OP/BP 4.01 (Environmental Assessment), OP/BP 4.04 (Natural Habitats), OP/BP 4.10 (Indigenous People) and OP/BP 4.12 (Involuntary Resettlement). According to the PAD (p. 24) these policies were triggered due to the business plans to be developed which were to lead to subsequent investments that were likely to impact natural habitats. However, most of these impacts were expected to be positive. Indigenous Peoples were also likely to be present in some of the areas and were likely to benefit from reform pathways when implemented. Finally, subsequent investments identified from the business plan could result in loss of access to natural resources in legally designated parks.

According to the ICR (p. 23) an Environmental and Social Management Framework (ESMF) was prepared and developed the process for identifying environmental and social risks and provided mitigation measures. The ESMF was supposed to be used in the business case development process. However, the ICR (p. 23) stated that the Bank did not provide enough support and that most EAs lacked experience for the submitted business cases fulfilling the requirements of the ESMF. The ICR (p. 20) stated that the Bank team did not include a safeguards specialist. Also, at the end of project implementation, three EAs applied the ESMF for their business cases. The ESMF identified social and environmental risks and included mitigation measures and resulted in the business cases complying with the grant agreements. However, this required the ICR deadline to be extended by nine months. According to the ICR (p. 23) the ESMF was supposed to be



applied in the business case development process. However, due to lack of Bank support and experience by some EAs, the submitted business cases, with the exception of two cases, did not comply with the requirements of the ESMF.

b. Fiduciary Compliance

Financial Management:

The Bank team stated (May 26, 2020) that at Assessment stage all arrangements were assessed to be satisfactory. Virtual trainings were also conducted for finance staff of each of the EA's. Also, the project complied with the Bank's financial covenants. Furthermore, the Bank team stated that the external audits were generally conducted in a timely manner and accepted by the Bank.

However, according to the ICR (p. 22) the project's financial management and procurement performance was negatively impacted by the lack of experience of some EAs with the Bank's financial management and procurement policies and procedures. All EA's, with the exception of the FAO, had difficulties to comply with the Bank's Financial Management and procurement requirements.

According to the Bank team (May 26, 2020), the grant recipients sometimes experienced delays in receiving their funds. This resulted from delays and cancellations in the completion of agreed activities required using funds for different activities in pursuit of the similar objectives, which required approval by the Task Team Leader and were time consuming to process. Furthermore, EAs experienced delays in receiving clearances for Terms of References. Also, due to a small supervision budget, the Bank could only provide limited financial management supervision/monitoring.

Procurement:

According to the ICR (p. 22) procurement procedures were not sufficiently explained to EAs. Also, the ICR (p. 22) stated that the Bank team experienced a high turnover of procurement staff, which had a negative impact on the understanding of the Bank's procurement rules among the EAs. In March 2018, a permanent procurement specialist joined the Bank team, which helped to solve misunderstandings. The ICR (p. 19) stated that the Bank team provided support to build capacity within some EAs. However, the ICR also stated that due to budgetary constraints the Bank team could not provide as much support as needed.

c. Unintended impacts (Positive or Negative)

NA

d. Other



11. Ratings

Ratings	ICR	IEG	Reason for Disagreements/Comment
Outcome	Unsatisfactory	Unsatisfactory	
Bank Performance	Unsatisfactory	Unsatisfactory	
Quality of M&E	Negligible	Negligible	
Quality of ICR	---	Modest	

12. Lessons

The ICR (p. 24-25) included a few lessons learned:

- **The Bank’s country focused business model and Investment Project Financing are not suitable for a global project with a focus on areas beyond national jurisdiction.** This project included four different regions, and four different EAs, requiring intense supervision. However, despite the project’s global scope, the supervision budget was not adjusted to allow for the required supervision. Also, given the EA’s lack of experience with Bank procedures, financing the project through a Bank-executed (BE) Advisory Services and Analytics (ASA) might have been a better fit.
- **Establishing a permanent expert group for fishery projects could be beneficial for providing feedback and ensure knowledge transfer between projects.** In this project, a group of experts within the GloTT was established which generated and disseminated focused knowledge on improving ABNJ fisheries globally, by developing and presenting various reports and academic papers.

13. Assessment Recommended?

No

14. Comments on Quality of ICR

The ICR provides a very brief overview of project preparation and implementation. The ICR does not include an Economic analysis, is often internally inconsistent and quite vague. For example, the ICR states (ICR para.57) “as a result, some tasks of the project M&E had to be conducted during the ICR process” but does not define what tasks it is referring to. Also, the ICR does not provide sufficient information in critical areas such as procurement and financial management even though these areas presented significant challenges to implementation. In addition, the ICR only discusses the achievement of two PDO indicators in the efficacy section, does not mention the achievement of any other indicators included in the Results Framework or



provide any other data. Also, the ICR does not provide any other evidence to support ratings in the efficacy section.

Furthermore, the ICR does not list any outputs that the project delivered under objective 1.

a. Quality of ICR Rating

Modest