Evaluation of Mainstreaming Green Growth and Climate Change into the AfDB's Interventions: Management Response

Corporate evaluations
February, 2021
# Acronyms

<table>
<thead>
<tr>
<th>Acronym</th>
<th>Full Form</th>
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<tbody>
<tr>
<td>ADF</td>
<td>African Development Fund</td>
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<td>ADF-15</td>
<td>Fifteenth Replenishment of the African Development Fund</td>
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<td>AfDB</td>
<td>African Development Bank</td>
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<td>IDEV</td>
<td>Independent Evaluation Department</td>
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<td>CC</td>
<td>Climate Change</td>
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<td>CC-GG</td>
<td>Climate Change and Green Growth</td>
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<td>CSP</td>
<td>Country Strategy Paper</td>
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<td>GCI-VII</td>
<td>Seventh General Capital Increase</td>
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<td>GG</td>
<td>Green Growth</td>
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<td>KPI</td>
<td>Key Performance Indicator</td>
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<td>MDB</td>
<td>Multilateral Development Bank</td>
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<td>MERL</td>
<td>Monitoring, Evaluation, Reporting and Learning Framework</td>
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<td>NDC</td>
<td>Nationally Determined Contribution</td>
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<td>NSO</td>
<td>Non-Sovereign Operation</td>
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<td>PECG</td>
<td>Climate Change and Green Growth Department</td>
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<td>PEVP</td>
<td>Vice Presidency for Power, Energy, Climate Change and Green Growth</td>
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<td>RISP</td>
<td>Regional Strategy Integration Paper</td>
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<td>RMC</td>
<td>Regional Member Country</td>
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<td>TYS</td>
<td>Ten-Year Strategy 2013-2022</td>
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<td>USD</td>
<td>United States Dollar</td>
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Management Response

Management welcomes IDEV’s evaluation of the Bank’s interventions on mainstreaming green growth and climate change. The evaluation is a fair assessment of the Bank’s support for climate change and green growth over 2008-2018. Management agrees with most of IDEV’s findings and recommendations and will draw on them as it continues to develop the Bank’s new climate change and green growth policy framework. This note presents Management’s responses to key issues raised by the evaluation and highlights ongoing and planned actions to implement IDEV’s recommendations.

INTRODUCTION

IDEV’s evaluation of the Bank’s interventions on mainstreaming climate change and green growth (CC-GG) over 2008-2018 is timely. It comes as the Bank’s second Climate Change Action Plan (2016-2020) ends and as Management prepares a new CC-GG policy framework that will include (a) an umbrella Climate Change and Green Growth Policy, (b) a 10-year Climate Change and Green Growth Strategy, and (c) the third five-year Climate Change and Green Investment Plan (2021-2025).

Beyond IDEV’s evaluation and as part of the recent Seventh General Capital Increase (GCI-VII) and the Fifteenth Replenishment of the African Development Fund (ADF-15), the Bank has taken on several new commitments to CC-GG:

(i) Investing USD 25 billion in climate finance from 2020 to 2025 and allocating 40% of project approvals to climate finance, giving equal weight to adaptation and mitigation

(ii) Mainstreaming CC-GG in all operations, country strategy papers (CSPs), and regional integration strategy papers (RISPs)

(iii) Aligning Bank-financed investments with the objectives of the Paris Climate Agreement and the national climate action plans of regional member countries (RMCs), including RMCs’ nationally determined contributions (NDCs)

The Bank is aware of RMCs’ vulnerability to the impacts of climate change, and the urgent need to adapt and build resilience to these impacts while pursuing a low-carbon development pathway. The Bank is also aware of the threats that climate change poses to its own investments. This is why the Bank has scaled up its work on CC-GG over the last decade, a period that overlaps most of IDEV’s evaluation period (2008–2018).

The Bank’s work on climate change was essentially structured in 2009 with the development of the Bank’s Climate Risk Management and Adaptation Strategy. Efforts to address climate change were scaled up in the Bank’s first Climate Change Action Plan (2011–2015), which embraced the concept of “climate-compatible development” and provided that economic development could be pursued while addressing climate change. Efforts to address climate risks in the Bank’s operations and build climate resilience in RMCs while promoting green and inclusive growth were further strengthened with the adoption of the Bank’s Ten-Year Strategy 2013-2022 (TYS) and the Transitioning Towards Green Growth Framework (2014). The TYS – which remains in force – aims to build resilience to climate change impacts, produce sustainable infrastructure, and promote the sustainable use of natural resources.

The Bank’s CC-GG work advanced further with the development of the Bank’s second Climate Change Action Plan (2016-2020). This plan set more ambitious targets, particularly with regards to scaling up climate finance and better mainstreaming CC-GG in the Bank’s policies, strategies, and operations. It also took into consideration key global commitments such as the sustainable development goals and the Paris Agreement. In 2016, the Bank established the Climate Change and Green Growth Department (PCCG) to ramp up its capacity to deliver the Bank’s CC-GG agenda, among other things by mainstreaming CC-GG at all of the Bank’s policy and operational levels.

The period covered by IDEV’s evaluation (2008-2018), especially the second half, thus saw much greater mainstreaming of CC-GG objectives in the Bank’s policies and operations. The Bank set clear targets for mainstreaming CC-GG in CSPs and RISPs and in sovereign and non-sovereign operations. The Bank also set targets to mobilise and allocate climate finance, develop capacity, and generate knowledge.
MAIN FINDINGS AND LESSONS OF THE EVALUATION

Below are the main findings and lessons of IDEV’s evaluation and Management’s actions, ongoing and planned, to implement IDEV’s recommendations.

Gaps in mainstreaming CC-GG in the Bank’s operations – IDEV’s evaluation found several gaps in mainstreaming that Management had noted likewise. IDEV notes that while mainstreaming CC-GG in CSPs and RISPs is improved, with many CSPs/RISPs now specifying CC-GG activities and objectives, the CC-GG activities/components of CSPs/RISPs have only been implemented to a limited extent and the pathways to change are not clear. Similarly, at an operational level, CC-GG-related activities are seldom pursued during project implementation, and project logframes lack clear CC-GG-linked activities, outputs, and outcomes. The extent to which the Bank’s investments achieve CC-GG-related results is rarely measured during project implementation. Further, IDEV notes that PECG has no means of preventing a project that has not mainstreamed CC-GG from being approved by the Board. This has limited the effectiveness of CC-GG mainstreaming and reduced monitoring and reporting on CC-related outputs and impacts.

Aware of these shortcomings, Management implemented several measures in the past five years:

1. Establishment in 2016 of a dedicated department to spearhead the Bank's CC-GG work.
2. Development of CC-GG mainstreaming tools and development of guidelines to mainstream CC-GG in CSPs/RISPs.
3. Continuous training of CC-GG officers and of task managers across all complexes on CC-GG tools, on climate finance, and on mainstreaming CC-GG in general.
5. Deployment of CC-GG officers in the regions since 2017 to help mainstream CC-GG.
6. Organisation of annual CC-GG days since 2018 to raise awareness on climate change and sensitise task managers to tools and mainstreaming.

To further mainstream CC-GG in the Bank’s operations, the Bank made its 40% climate finance target a corporate key performance indicator (KPI). As such, the target is monitored in the Bank’s Results Measurement Framework and reported annually using multilateral development banks’ (MDBs’) methodologies to track climate finance. Management is currently exploring how to cascade this KPI in all operational complexes and regional offices. Similarly, the revised readiness review, which takes place when preparing project concept notes and project appraisal reports, requires that projects be screened for climate risks, that projects’ carbon footprint be calculated and reported, and that projects be designed with a sound CC-GG rationale.

RMCs limited understanding of green growth – IDEV notes inconsistencies in RMCs’ understanding of green growth (GG), especially among RMCs without a GG or low-carbon development policy. It notes that while the Bank did well in developing tools, guidelines, relevant processes, and targets with a clear climate change mainstreaming perspective, GG mainstreaming is less clear. To address this gap, the new Climate Change and Green Growth Policy, Strategy, and Action Plan will explain these concepts more clearly and suggest ways to encourage GG when conducting lending operations.

Ongoing work on the circular economy and waste management already provide a starting point for operationalising GG in operations (Box 1).

Box 1: Examples of new circular economy initiatives

- The Green Growth Investment Program in Africa, which focuses on waste management and the circular economy.
- The Africa Circular Economy Facility, a multi-donor trust fund established by the Bank to support the adoption and diffusion of circular practices in RMCs.
- The Africa Circular Economy, a country-led coalition of African nations and global partners hosted by the Bank that advances the transition to a circular economy and supports cleaner production and consumption systems in Africa as avenues for attaining GG.

Limited direct partnerships with RMCs on CC-GG – IDEV’s evaluation finds that although the Bank has developed partnerships with a considerable array of regional and international partners in strategic, financial, and technical areas that assist RMCs to mainstream CC-GG in their development interventions, the Bank is not engaging with RMCs directly. Direct engagement is necessary for better alignment and results.

To deepen policy engagement in and support for CC-GG in RMCs, the Bank has established flagship initiatives on CC-GG (e.g., the African NDC Hub, the African Financial Alliance on Climate Change, and the Adaptation Benefit Mechanism). The Bank also hosts
key instruments and facilities such as the ClimDev-Africa Special Fund and the Africa Climate Change Fund, through which PECG works closely with country/regional offices to strengthen the Bank’s engagement with RMCs.

Further, the Bank will enhance its policy engagement by supporting RMCs to review or implement their NDCs, national adaptation plans, GG strategies, and long-term strategies. The Bank will build public and private sector agencies’ capacity to capitalise on climate finance opportunities, and will scale up its support to the African Group of Negotiators on Climate Change (AGN), the African Ministerial Conference on the Environment (AMCEN), and the Committee of African Heads of States and Government on Climate Change to enhance Africa’s voice and advocate for Africa’s priorities on climate change on the global stage.

Inadequate budgets for CC-GG activities – IDEV identifies inadequate budgets for CC-GG activities as the primary barrier to operations’ realising CC-GG outcomes. Management will work with project teams to better budget for CC-GG-related activities in operations. It will mobilise more climate finance to implement the Bank’s CC-GG projects, by targeting a range of partners outside traditional climate finance purveyors (multilateral funds): for example, bilateral donors, private finance entities, and the financial industry.

Inadequate integration of CC-GG activities in project logframes and in monitoring and evaluation – To make the Bank’s work on CC-GG more visible, Management is developing a Monitoring, Evaluation, Reporting and Learning Framework (MERL). The MERL will track the Bank’s CC-GG investments, record their outcomes, and link to the Bank’s Results Measurement Framework. Going forward, PECG will train task managers to better include CC-GG-related activities and outputs/outcomes in project logframes, and to monitor implementation during routine supervision missions and in project completion reports. To this end, PECG staff will actively participate in Bank missions to track and monitor the implementation of CC-GG activities and emerging outcomes and lessons. Moreover, under its upcoming CC-GG policy framework, the Bank will align its operations with MDBs’ joint Paris Alignment framework. Finally, the Bank shall consider requiring CC-GG mainstreaming for all operations seeking Board approval.

RELEVANCE OF THE BANK’S SUPPORT
Management welcomes IDEV’s finding that the Bank’s support for CC-GG has been satisfactory. In supporting RMCs with projects in different sectors of the economy (energy, water, transport, etc.), the Bank has endeavoured to align its interventions closely with countries’ national CC-GG priorities and plans (NDCs, national adaptation plans, etc.), with the plans of regional and continental bodies, and with the Bank’s own policies and strategies. Recognizing the cross-border/ regional dimension of climate change, the Bank will continue to support regional bodies such as Regional Economic Communities (RECs) and Regional Climate Centers to ensure continental and regional coordination of policy responses. The Bank is already mainstreaming climate change and green growth in Regional Integration Strategy Papers to not only promote regional responses to climate change but also to support development of cross-border projects to address impacts that spans borders. The Bank is also building the capacity of African Climate Centers such as the African Center for Meteorological Applications for Development (ACMAD) to deliver quality weather and climate services for development planning. The Bank is supporting regional initiatives such as the Great Green Wall and the Sahel Climate Investment Plan. Going forward, PECG will work with ECVP to align CSPs/RISPs with national NDCs, NAPs and Green Growth policies, and in developing pipelines to support CC-GG related investments in RMCs.

At the same time, IDEV notes instances where the Bank’s investments were not aligned with its own policies. This was the case in Cameroon, where the Bank built a power station fuelled by heavy fuel oil in contradiction to its own 2009 Climate Risk Management Strategy and Adaptation Strategy and Climate Change Action Plan 2011-2015. Management recognises the need not only to better align the Bank’s operations to its own CC-GG policies and commitments, but also to adjust its policies and operations to converge more closely to international CC-GG policy orientations.

EFFECTIVENESS OF THE BANK’S SUPPORT
Management notes IDEV’s observation that the effectiveness of the Bank’s support for CC-GG was unsatisfactory for a quarter of the projects and that it could not be assessed in almost half of the projects due to a lack of data. More specifically, IDEV could not assess 40 percent of sampled projects, either because the projects lacked clear objectives for CC-GG outputs or outcomes, because indicators were not specific enough to allow outputs/outcomes to be assessed objectively, or because data on performance/effectiveness was not available.

Management is aware of the challenges of including CC-GG inputs (including expected outputs/outcomes and activities) in final project appraisal reports. In addition, Management recognises that the CC-GG unit is not in
a position to sanction projects that fail to incorporate CC-GG inputs.

Management has created technical and quality assurance committees and the Technical Investment Committee to improve the quality of public and private sector projects. PECG is represented on these committees to make sure that when projects are reviewed, CC-GG measures are part of project design and implementation. In response to IDEV’s observation that climate change mainstreaming tools are cumbersome, the Bank plans to improve the tools continuously to make them more user-friendly. The Bank will also set up clinics to train task managers in the tools’ use.

Going forward, Management will give a clear directive to all operational complexes and task teams to mainstream CC-GG with clear targets in the logframes. CC-GG officers already help design projects, but where necessary, Management will strengthen officers’ participation in project supervision as well.

**EFFICIENCY OF THE BANK’S SUPPORT**

Management welcomes IDEV’s finding that projects that mainstream CC-GG use budgets efficiently and find solutions to challenges in implementation. This said, IDEV noted significant delays in project implementation. A lack of data prevented IDEV from assessing the efficiency of projects’ use of time.

Management notes that some of the factors that hinder the timely implementation of projects are external to the Bank. Nonetheless, Management will make project implementation more efficient by leveraging internal and external climate financing and lowering the transaction costs of mobilising climate finance, notably by pursuing more large programs and fewer small ones.

**SUSTAINABILITY OF CC-GG INTERVENTIONS**

IDEV finds that most of the projects it evaluated had exit strategies and incorporated some sustainability measures. However, too few projects featured credible sustainability plans that considered CC-GG factors and institutional or financial factors. To make its operations more sustainable, the Bank will step up policy dialogue and engagement to continue to ensure that its operations align with national development policies and with RMCs’ CC-GG plans.

Additionally, the Bank will improve the commercial and financial viability of its interventions by enhancing its commercial and financial analyses. It will also champion the development of policies that are aligned with international GG-GG policies, and generate knowledge and training to build in-country capacity to operate and maintain investments. To ensure that its interventions are environmentally sustainable, the Bank will better screen its investments for climate risk and will implement appropriate mitigation measures, building RMCs’ capacity and knowledge to address the challenges of climate change and reform policies and regulations to ensure sustainability. The Bank has committed to promoting the best, affordable clean and efficient technologies available to reduce greenhouse gas emissions. This includes assisting RMCs to (i) gradually increase the sustainable use of renewable energy sources where possible, (ii) foster energy efficiency, and (iii) adopt cleaner technologies.

**CONCLUSION**

IDEV’s evaluation highlighted several areas where the Bank can improve delivery on its CC-GG agenda. IDEV’s report is very timely, as the Bank is developing its new Climate Change and Green Growth Policy, Strategy, and Action Plan. The Bank will seek to mobilise more internal and external financing for CC-GG interventions in RMCs from dedicated climate funding mechanisms. The Bank will then be in a better position to support RMCs as they build climate resilience while pursuing green and low-carbon development trajectories. The ongoing work of the Bank and other MDBs to use the joint Paris Alignment framework to align investments to the goals of the Paris Agreement will help address the issues raised by IDEV as well.

The findings, lessons, and recommendations in IDEV’s evaluation reaffirm efforts that are underway and will encourage the Bank’s work and actions on CC-GG, thereby contributing to the Bank’s High 5s.
### MANAGEMENT ACTION RECORD

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| **RECOMMENDATION 1** — Locate the department responsible for CC-GG appropriately in the Bank’s hierarchy so that it provides overall strategic oversight and guidance of all CC-GG activities, including responsibilities for appropriate targets that are cascaded throughout the institution | **AGREED** — Management agrees that PECG’s position should be strengthened, and Management has taken several steps to improve CC-GG mainstreaming in policies/operations (see above).

The Bank’s climate finance target is included in the Results Measurement Framework and in the Institutional key performance indicators and targets which are broken down by complex and business delivery units.

**Further actions**
- The Bank is currently developing a new CC-GG policy, strategy and action plan, which will further ensure CC-GG mainstreaming in all Bank policies, programs and operations. *(PECG, Q3 2021)*.
- To ensure that Bank’s climate finance target is shared across complexes and regions, Management has ensured that the climate finance target becomes a Bank corporate KPI. This target is already part of the internal dialogues during the annual Work Planning Week roundtables with Directors General, Deputy Directors General and Country Managers on how to achieve it at Regional and County level. Management will continue sensitizing Bank’s managers and task managers to ensure that the target is considered a joint KPI. *(PECG, Q4 2021)*.
- Management will ensure that the new CC-GG policy makes CC-GG mainstreaming mandatory for project approval and that projects that do not demonstrate having mainstreamed CC-GG are not considered for approval. *(PECG, Q4 2021)*.
- In addition to the Non-Sovereign Operations (NSO) Pathway for the Operations Academy developed by Management (with an e-course on climate change, green growth, and gender in the Bank’s NSOs), the Bank will develop tools and guidelines to bolster CC-GG mainstreaming in private sector operations (NSOs) and lines of credit and to help micro, small and medium enterprises integrate CC-GG considerations in their operations. *(PECG, Q1 2022)*. |

| a) Engage equally well with all operational complexes; |  |
| b) Ensure that the Bank’s climate finance target is shared across complexes and regional delivery units; |  |
| c) Make CC-GG mainstreaming a mandatory process for project appraisal, like E&SS disclosure requirement. This will enhance the unit’s efforts to maximise upstream influence on strategic planning and decision-making to increase the efficiency and effectiveness of CC-GG mainstreaming and supporting RMCs that are implementing NDC action plans and projects. |  |

| **RECOMMENDATION 2** — Strengthen the technical and institutional capacities of the Bank’s GG-CC specialised unit, PECG, to provide quality and timely hands-on support to the Bank’s Regional and Country Offices for effective GG-CC mainstreaming throughout the project cycle. | **AGREED** — Management recognises that the current staffing of the department is very low as compared to the country demand. Management therefore agrees that PECG capacity needs to be strengthened in order to support Bank’s Regional and Country Offices to effectively mainstream CC-GG into Bank’s operations across the project cycle. |

| a) Strengthen the technical and institutional capacities of the Bank’s GG-CC specialised unit, PECG |  |
**RECOMMENDATION 3 – Establish a clear theory of change (particularly for GG, but probably also CC), and an integrated CC-GG results framework, with clear definitions that follow the recently strengthened and agreed CC-GG definitions of MDBs.**

a) Define Green Growth and ensure the meaning of the concept is mainstreamed across operations and interventions, and develop CC-GG mainstreaming guidance notes;

b) Ensure consistency of concepts across all strategies and policy documents, with more ‘actionable’ items in accordance with country NDC targets to help clarify what an ‘inclusive green growth’ compliant project is;

c) Improve monitoring and evaluation of CC-GG investments and develop tools for users, knowledge products, learning processes and result indicators to improve project implementation.

**AGREED** — Management agrees with the need to develop a theory of change for CC-GG mainstreaming as well as an integrated CC-GG results framework.

**Further actions**

- Through its new CC-GG policy and strategic framework, the Bank will review and harmonise its concept of GG with the concept of other MDBs, including criteria and indicators for measuring CC-GG outcomes. To this end, the Bank will develop knowledge products that define Bank’s concept of GG and the operationalisation of GG in programs and projects. It will also educate staff in all complexes on the concept, how to apply it in programs and operations, and what tools to use to do so. To keep all complexes abreast with development in the climate change and green growth arena, Management will organize quarterly/bi-annual regional trainings/sensitizations on state of play of the international climate change and green growth agenda, while continuing with the organisation of the Annual Green Growth Days. (PECG, Q4 2022).

- The Bank will develop guidelines for mainstreaming CC-GG during project implementation, including criteria and indicators for tracking CC-GG components and measuring CC-GG outcomes. Going forward, PECG will take part in project supervision activities and in developing project completion reports that track the implementation of CC-GG measures and their outcomes. PECG will work with ECST to build capacity for data collection on CC-GG and ensure data collection on CC-GG takes place in National Statistical Offices. (PECG, Q4 2022).

- The Bank is developing a Monitoring, Evaluation, Reporting, and Learning (MERL) system to monitor and evaluate the Bank’s CC-GG work and investments and link to the Bank’s Results Measurement Framework. The MERL will also track results on adaptation and mitigation outcomes of Bank’s support to CC-GG, as well as achievements with regards to supporting development of an enabling environment for CC-GG in RMCs and in mobilizing climate finance. (PECG, Q4 2021).
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| **RECOMMENDATION 4** – Clarify focus areas for CC-GG interventions for the AfDB that appropriately consider the Bank’s comparative advantage but need to pull in expertise across sectors as needed. | **AGREED**—Management agrees with the recommendation to clarify focus areas for CC-GG interventions. As part of the Bank’s selectivity approach, and based on Bank’s comparative advantage, Management has clarified Bank’s focus areas for CC-GG which will inform the design of the Bank’s new CC-GG framework. These will include enhancing country support under the NDC Hub through which the Bank will support RMCs to review their NDCs and develop their long-term climate strategies. **Further actions**  
- In the context of ADF-15 and GCI-VII, the Bank will support the revision or development of NDCs in 10 ADF countries including transition states. *(PECG, Q4 2022)*.  
- While Management agrees with the need for an internal facility, there are existing facilities within the Bank which already provide technical assistance and support to early-stage studies. These include for instance the ADF and ADB windows as well as existing climate facilities such ACCF and SEFA. Such facilities need to be strengthened to support projects with potential climate co-benefits. *(PECG, Q4 2023)*.  
- The Bank will support policy engagement in the 10 ADF countries within the framework of the NDC Hub. Management has also initiated several programs to enhance RMCs’ understanding of and engagement in GG as highlighted in Box 1. Through these programs, the Bank will train private sector and government agencies on CC-GG and the business opportunities they present as well as on concessional resources available for investments in CC-GG interventions. The Bank is already training financial institutions and government agencies in several RMCs on concessional resources and technical assistance opportunities presented by international environment and climate funds. *(PECG, Q4, 2022)*. |

a) Deliver dynamic support services to RMCs on issues pertaining to CC-GG, and its wider mandate related to the project cycle.  
b) Establish a special fund/facility that is resourced internally to support early-stage studies, technical assistance and/or business development for projects with the potential to attract external climate finance.
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| **RECOMMENDATION** 5. Put in place adequate mechanisms to monitor and track GG-CC results throughout the project cycle to: (i) promote continued attention for GG-CC during project implementation; (ii) enable the Bank to address potential barriers to the uptake and effectiveness of GG-CC mainstreaming; and (iii) improve reporting on the results achieved. | **AGREED**—Management agrees with the recommendation to put in place adequate mechanisms to monitor and track GG-CC results throughout the project cycle. As part of its monthly reporting, the Bank is already tracking CC-GG mainstreaming and climate finance commitments.  
**Further actions**  
- Building on IDEV’s database and internal departments’ monthly, quarterly, and annual reports, Management will develop a system to catalogue all Bank operations with a view to determining whether and how well they mainstreamed CC-GG, implemented CC-GG components and activities, and achieved results and targets. *(PECG, Q2 022)* |

a) Put in place adequate mechanisms to monitor and track GG-CC results throughout the project cycle to: (i) promote continued attention for GG-CC during project implementation; (ii) enable the Bank to address potential barriers to the uptake and effectiveness of GG-CC mainstreaming; and (iii) improve reporting on the results achieved (at both the Bank and project-level)