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## Evaluation of the Second Objective of the Biodiversity Cross-cutting Intervention Framework (2013–2017)

### Synthesis of the final report

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## 1. Foreword

The Agence Française de Développement (AFD) has entrusted the **evaluation of the second objective of the Biodiversity Cross-cutting Intervention Framework** to EY in partnership with Biotope. The Cross-cutting Intervention Frameworks (CIF) and Sectoral Intervention Frameworks (SIF) are reference documents describing how AFD Group develops its interventions in a specific domain. These documents allow the Agency to communicate on a specific theme or sector and take a position on key subjects in official development assistance (ODA).

Launched by incorporating a dual logic of accountability and learning, **this study aims to:**

- Elaborate an **evaluation analysis and conclusions** to assess the relevance, implementation, effectiveness and impact of the Biodiversity CIF's second objective, including an analysis of its accountability framework.
- Provide **recommendations** based on the overall conclusions reached and draw lessons from the CIF's implementation with a view to preparing future AFD strategic documents (a new AFD Group Strategy titled "Towards a World in Common" was published in August 2018 for the 2018–2022 period, and should be followed by sectoral "transition" strategies, which were being defined at the time of the evaluation).

The evaluation was carried out following the single methodological framework for both CIFs and SIFs, which is described in a specific "methodological

guideline". In line with this methodology, the evaluation considers two central dimensions of the Biodiversity CIF:

- The **discourse and its formulation process:** relevance of AFD's strategic positioning on biodiversity, the effectiveness of its formulation process and how this positioning could evolve, as well as the ways in which this strategic theme is promoted internally and its impact on the visibility of AFD actions and strategies regarding this theme.
- The **management and evolution of the portfolio of interventions** and the monitoring of their effects: the alignment of these interventions with the strategy promoted by the CIF, the operational difficulties encountered, the general effectiveness of the identification, support and monitoring process, effectiveness of the interventions themselves.

This evaluation was **structured into three phases** carried out between April 2018 and February 2019. These phases included (i) a kick-off and framing phase, (ii) a data collection phase – mainly through online surveys targeting AFD Group's project managers, agents, partners and counterparts, case studies and complementary interviews – and (iii) a phase for analysis, assessment and the formulation of recommendations. Proparco, AFD's private-sector financing subsidiary was also integrated into the overall data collection.

Synopsis of the data collection techniques



LITERATURE REVIEW	ONLINE SURVEYS	INTERVIEWS	CASE STUDIES
<p>In-depth analysis</p>	<p><b>3</b> online surveys</p> <ul style="list-style-type: none"> <li>▶ 87 responses from project managers</li> <li>▶ 85 responses from agents</li> <li>▶ 76 responses from partners and counterparts</li> </ul>	<p><b>13</b> people interviewed</p>	<p><b>15</b> case studies</p>

## 2. The second objective of the Biodiversity CIF

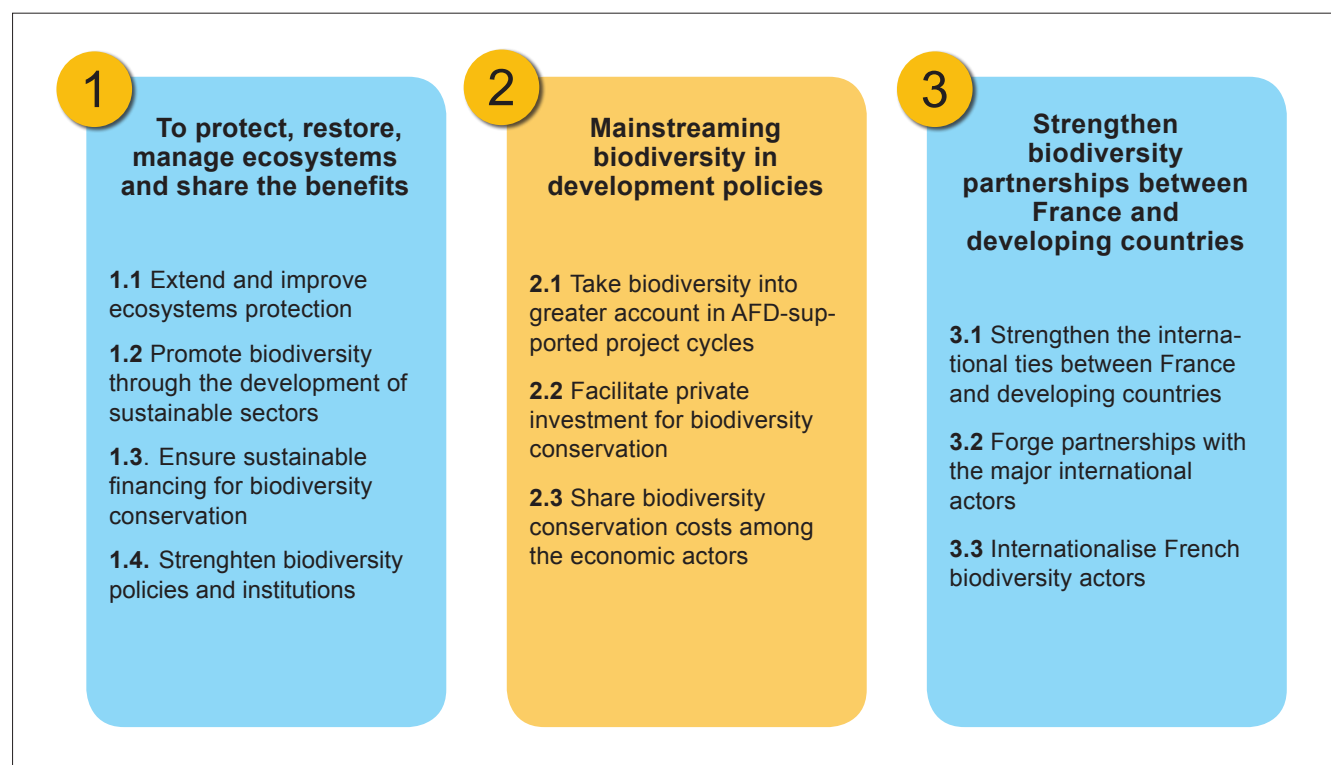
### 2.1. Presentation of the Biodiversity CIF

The Biodiversity CIF was drafted in 2013 through a partnership of AFD agents and different external stakeholders involved in the topic. Factoring in AFD’s geographical mandates, the Biodiversity CIF aims to turn the conservation and sustainable enhancement of ecosystems into catalysts for inclusive growth in countries where AFD is active. The goal is to create conditions for sustainable development<sup>1</sup>. Through this effort, AFD aims

to further France’s commitment to halting the erosion of global biodiversity while pursuing its objectives of increasing humanity’s quality of life and living standards as well as combatting economic and social inequalities.

Three objectives and sub-objectives were defined and are presented in Figure 1.

Figure 1 – Biodiversity CIF objectives and sub-objectives



Source: EY-Biotope based on the Biodiversity CIF.

<sup>1</sup> Biodiversity CIF 2013–2016, p. 38.

Among these three objectives is the **objective of mainstreaming biodiversity protection into all sectoral policies** (Objective 2). Divided into three sub-objectives, it provides operational tools to avoid the most destructive options for biodiversity, minimise impacts on the biosphere and systematically compensate unavoidable damages to biodiversity (most notably through restoration work targeting degraded ecosystems).

The Biodiversity CIF plans to increase AFD's annual commitments for biodiversity to €160 M. It further states that Objective 2 will account for 21% of the total amount, which represents €34 M annually. These commitments are calculated based on an accounting methodology designed by AFD and on the cross-checking of an indicator for each financed project and the relevant sector<sup>2</sup>.

## 2.2. Summary of the tools mentioned in the CIF's second objective

The second objective of the CIF lists different tools to incorporate biodiversity preservation into all projects financed by AFD across different sectors.

### Integration of biodiversity issues into AFD's strategic documents

The CIF stipulates that biodiversity and ecosystem dimensions should be integrated into AFD's strategic documents, namely the Sectoral Intervention Frameworks (SIFs) and the Regional and Country Intervention Frameworks, as and when these are updated.

### Exclusion List

Since 2009, AFD has had an exclusion list that specifies project and activity categories that the Group refuses to finance. The exclusion list should ideally be consulted at the beginning of project appraisal. Expertise on the contents of this list is shared between the environmental support services of AFD and Proparco (AFD's Environmental, Social and Sustainable Development Support Division [AES] and Proparco's Environment, Social and Governance Division [ESG] respectively) for technical analysis and the Compliance Department (DCO) for assessing the compliance or non-compliance with the exclusion list.

<sup>2</sup> Details are provided in section 3.3.

### Financial Instruments

In addition to AFD's usual financial instruments (loans and grants), various mechanisms are mentioned in the Biodiversity CIF to enable implementation of sub-objectives 2.2 and 2.3.

Loans and grants financing AFD actions:

- Credit lines for businesses to meet environmental regulations and/or to finance their projects to enhance biodiversity (ecotourism, eco-sectors),
- Financing technical assistance and venture capital for eco-friendly investment funds,
- Instruments that allow the cost of biodiversity conservation to be shared, notably through support for schemes to pay for environmental services.

### Ex-ante environmental and social assessment

The ex-ante analysis, or the environmental and social (E&S) risk assessments prior to each project, falls under the responsibility of the project owner and is most often outsourced to a specialised consulting firm. This assessment, which leads to the definition of the main challenges and the identification of the project's potential



environmental and social risks, includes an assessment of the risks to biodiversity. It results in the project being classified in category A, B+, B or C. AFD's Social, Environment, Sustainable Development Support Division (AES) and Proparco's Environment, Social and Governance Division (ESG) can assist in implementing the E&S evaluation (assistance in formulating the Terms of References, proof-reading the E&S documents produced).

The implementation of the ARC (Avoid, Reduce, Compensate) sequence is included in this social and environmental risk assessment. It involves defining the environmental requirements that are to be respected during the implementation of a project or during its design phase (notably avoidance measures).

#### **Sustainable Development Analysis and Opinion mechanism**

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The Sustainable Development Analysis and Opinion mechanism was first introduced as a pilot in March 2013. Note that this tool is not used by Proparco. It is part of

AFD's effort to embed sustainable development in all its operations. There are three objectives:

- Improve the mainstreaming of sustainable development into operations, and thus the overall quality of AFD's portfolio,
- Inform the decision-making bodies about the contributions of the projects to sustainable development,
- Serve as a support for ex-post evaluations.

#### **Implementation of the ARC sequence (Avoid, Reduce, Compensate)**

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Following the classification of the project and the definition of ARC measures, the project owner must implement the "Avoid, Reduce, Compensate" sequence in compliance with the commitments made. The AES (AFD) and ESG (Proparco) divisions must ensure that the measures are complied with, and that the project is carried out in line with the defined action plans.

## 3. Main conclusions of the evaluation

### 3.1. Relevance

#### 3.1.1. The partnership-based process used to formulate the Biodiversity CIF guaranteed the relevance of the second objective to biodiversity issues

The Ministry for Europe and Foreign Affairs (MEAE), Ministry for the Ecological and Inclusive Transition (MTES) and DG Trésor (Ministry for the Economy and Finance) consider that the Biodiversity CIF and its second objective in particular constitute a relevant discourse with respect to the international objectives and guidelines of the supervisory ministries. These administrations, like the rest of the community, emphasise **the importance of mainstreaming biodiversity into sectoral policies**. This positive perception (of those familiar with the document) likely results from an open and participative consultation and approval process, based on a broad consultation organised both externally and internally to AFD Group.

The formulation of the Biodiversity CIF's second objective has successfully integrated biodiversity issues on a global scale. Since the CIF was formulated in 2013, the 2016 Conference of Parties (COP13) in Cancun adopted an exhaustive decision to mainstream biodiversity both within and between sectors (CBD, 2018)<sup>3</sup>. More recently, in November 2018, the COP14 reinforced the importance of this mainstreaming effort to attain concrete results. Thus, the second objective **is still relevant with respect to the latest developments in the international community's discussions and commitments** concerning actions to tackle biodiversity loss.

Nevertheless, it must be noted that the annual contribution targets set for the second objective for the period 2013–2016 (€34 M annually) are **not overly ambitious and do not factor in AFD Group's own growth objectives**. The target was in fact already largely exceeded in 2014, at the start of implementation of the Biodiversity CIF, and the average annual contribution was already over €31 M over the period 2006–2012.

#### 3.1.2. A lack of clarity in the formulation of sub-objectives and the definition of tools

The sub-objectives of the Biodiversity CIF's second objective respond to real, recognised needs, which means that they **are relevant** to the mainstreaming of biodiversity into development policies. However, their formulation lacks precision and makes it difficult to apply them to specific issues. The objective's implementation logic, meaning its translation into results, activities and tools, is incomplete and lacks coherence. In fact, the two pillars of mainstreaming biodiversity into development policy – namely (i) the reduction of projects' negative impacts on biodiversity and (ii) the maximisation of projects' potential positive impacts – are not explicitly formulated in the Biodiversity CIF. In addition, the three CIF sub-objectives form an inadequately balanced whole because they are not only redundant but **also apply to very different scales. Indeed, sub-objectives 2.2 and 2.3 are very precise, while sub-objective 2.1** – aimed at “taking

<sup>3</sup> Convention of Biological Diversity (CBD), 2018. The provisional agenda and revised annotations thereto for the meeting of the Conference of Parties to the Convention on Biological Diversity. CBD/COP/14/1/Add.1/Rev.1, 01/09/2018, p.21.

biodiversity into greater account in AFD-supported project cycles” – cross-cuts all AFD-supported projects. As a result, it could apply for example to nature conservation projects (supported by Objective1) or to credit-line projects (supported by sub-objective 2.2). Lastly, it is difficult to understand how the sub-objectives of Objective 2 combine with the rest of the sub-objectives in the Biodiversity CIF, and overlaps exist between different sub-objectives (sub-objectives 1.3 and 2.1, for example).

**The tools described in the Biodiversity CIF, while relevant in terms of their content, lack clarity and an operational application** in AFD’s various sectors of intervention. As the definition of the ARC measures are part of the environmental and social impact assessment, rewritten into an Environmental and Social Management Plan (ESMP), it is included in the ex-ante analysis. However, the ARC sequence is presented in the CIF as a concept rather than an actionable tool that includes the different phases of evaluation, implementation and follow-up of these options. The “implementation of the ARC sequence” has not always been understood by agents and project managers as a tool designed to help to formulate and implement the Biodiversity Action Plan integrated into the ESMP. Similarly, the Exclusion List describes the types of projects that the Group refuses to finance (e.g., the

destruction of a critical habitat) but does not adequately define how to determine what constitutes the critical character of habitats impacted by the project.

**3.1.3. The objective is consistent with the guidelines of other donors, but its operational aspects do not set AFD as a leader of mainstreaming biodiversity into development policies**

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The study of documentation and interviews with other donors revealed that few of them have already defined an internal strategy specific to biodiversity (examples of those who have done so include USAID<sup>4</sup> and the European Union<sup>5</sup>). However, other donors have implemented specific tools and approaches to evaluate biodiversity and ecosystem services within the project cycle they finance (environmental and social frameworks).

In general terms, private financing follows the International Finance Corporation’s standards, and public financing the World Bank’s standards. Although AFD and Proparco also follow these standards, it should be noted that **they comply with them less systematically and less rigorously** than other development banks. The studies of AFD projects, which were carried out within the framework of this evaluation, show for example that ex-ante analysis does not always meet international standards.

<sup>4</sup> USAID Biodiversity Policy (<http://www.usaid.gov/biodiversity/policy>) and the Biodiversity Handbook ([www.usaid.gov/biodiversity/impact/tools-and-guidance](http://www.usaid.gov/biodiversity/impact/tools-and-guidance)).

<sup>5</sup> The EU Biodiversity Strategy to 2020 (<http://ec.europa.eu/environment/nature/info/pubs/docs/brochures/2020%20Biod%20brochure%20final%20lowres.pdf>).

## 3.2. Implementation

### 3.2.1. The Biodiversity CIF was little promoted and shared within the Group

The promotion and diffusion activities foreseen in the design of the Biodiversity CIF (training, sector framework notes, online community, biodiversity focal points) were only partially implemented and mostly dealt with activities that are non-specific to biodiversity and organised independently of the CIF.

As such, some **training actions** integrate the topic of biodiversity in more or less depth: risk management training, a week-long voluntary biodiversity training course, Sustainable Development Analysis and Opinion training, which enable an integrated approach to biodiversity. **Although useful and relevant, these training courses could not adequately cover all the issues addressed in Objective 2 of the CIF** (a large number of courses concerned conservation projects addressed in Objective 1) and only benefitted a limited group of agents and project managers.

**The sector framework notes** listed in the CIF (sustainable management doctrines for fisheries and aquaculture, sustainable forest management, protected area management) were formulated, but they concerned almost exclusively subjects under Objective 1. As for the in-house biodiversity community mentioned in the CIF, even though a mailing list was produced (which was converted into a biodiversity online community in 2017), the community lacks dynamism and few agents follow the platform's biodiversity page.

In the **absence of actions to promote and very widely disseminate the document and its contents**, most of the knowledge that AFD Group agents have about the Biodiversity CIF comes from reading documents published by AFD for the purpose of communication and for the general public (Biodiversity CIF, 2013–2016 Action Plan for Nature and the Environment). Many agents also stated

they knew about the document because they were directly involved in its drafting.

Most agents thus consider that the **CIF was not sufficiently promoted and disseminated**. This may be explained by the lack of clear identification of the persons in charge of supporting and promoting the document and the resources allocated to its implementation. While the supervision and follow-up of the CIF's second objective lay more with the AES division, the different roles were not clearly specified in the CIF. In addition, the fact that the CIF made no reference to the skills and human resources required for its implementation, or to the training of project managers, was also emphasised during the evaluation.

### 3.2.2. The overall level of knowledge and awareness of the Biodiversity CIF is weak among agents and project managers, but knowledge about its tools is adequate

The analysis of the answers from AFD Group agents and project managers to the online survey reveals an **overall weak level of knowledge about the Biodiversity CIF**. Indeed, over three-quarters of the survey participants did not know of the document or had only weak or very weak knowledge about the CIF. In addition to the feedback received, the **difficulty of mobilising AFD agents** for these online surveys and case studies was a further indication that AFD staff had limited knowledge and awareness of the CIF and its contents.

The degree to which the CIF has been appropriated varies depending on the sectoral division: **all the Agriculture, Rural Development and Biodiversity Division (ARB) project managers stated they knew the document** and over two-thirds had substantive or very substantive knowledge about the document. In contrast, the results were mixed in other sector divisions, including those that have strong links with biodiversity, and whose projects may have a strong impact on biodiversity. This is the case, for example, of the Water and Sanitation Division

(EAA), where only a small minority of the respondent project managers had substantive knowledge about the document and one-third had no knowledge at all.

However, **weak knowledge of the Biodiversity CIF has no impact on a robust knowledge of the tools that it promotes.** The analysis of the answers provided by project managers to our surveys shows that the tools presented in the CIF are better known than the document itself, apart from the “Avoid, Reduce, Compensate,” which is not well-known as a tool.

### 3.2.3. The project managers’ vague perception and the lack of clarity in the CIF as to what is recommended and what is mandatory

The formulation of Biodiversity CIF does not allow for a clear distinction between what is mandatory and what is

recommended. For example, on the limitation of the projects’ negative impacts, the minimum target level is not clearly defined. The CIF does not specify whether projects have to attain “zero” negative impacts via reduction and compensation measures or if there is a certain tolerance, and if so, under which conditions.

Among AFD agents the Biodiversity CIF is perceived more as a document that provides general guidelines than obligations to be respected. Yet, at the same time, project managers consider that it is mandatory to implement the tools listed in the CIF, except for the ARC sequence.

## 3.3. Evaluability of interventions

### 3.3.1. The Biodiversity CIF’s accountability methodology has certain limits

The accountability method for assessing the extent to which AFD takes biodiversity into account was defined in the Biodiversity CIF. It is based on an accounting method for financial commitments in line with the logic developed internationally by the OECD Development Assistance Committee (DAC).

Concerning Objective 2 of the CIF, the method is based on calculating the sum of financial commitments for projects marked “1” according to the Rio markers for biodiversity (significant contribution but secondary to biodiversity<sup>6</sup>

preservation). In addition, a systematic weighting system of the recognised amount (30%<sup>7</sup> or 5%<sup>8</sup>) is applied according to the type of project and sector of intervention. Note that what is counted as contributing to the CIF’s Objective 1 includes all financing marked “2” (biodiversity preservation is the principal objective of the project) (100%) and some projects marked “1” (80%<sup>9</sup>).

Considering its ex-ante approach, the accounting of biodiversity commitments is based solely on the analysis of projects at the time of their appraisal and is not correlated to actual outcomes. At the time this evaluation was carried out, the accounting method was only applied to AFD projects and did not include Proparco projects.

<sup>6</sup> The concept of biodiversity first emerged at the Earth Summit in Rio de Janeiro (1992).

<sup>7</sup> Agro-ecology, pastoralism-transhumance, wastewater treatment, IWRM, organic fair-trade sectors.

<sup>8</sup> Urban development with an urban biodiversity element, sustainable waste treatment and lines of credit for the environment (non-climate).

<sup>9</sup> Sustainable management of forests/fisheries.

This accounting method for commitments in favour of biodiversity has some demonstrable advantages: it makes it possible to quantify the target to be reached, to conduct monitoring over time and establish trends based on a pre-defined method.

However, it **does not allow for international comparisons**, given the differences observed relative to other donors' methods and the heterogeneity of approaches among donors (some calculate their commitments based on real costs and others use different percentages than AFD) even though they all apply *ex-ante* accounting methods for their commitments.

Another limitation is that the recognised amounts do not reflect an absolute reality because they are the result of a **more or less arbitrarily defined percentage**. Thus, the weighting coefficients (30% and 5%) do not derive from an explicit analysis set out in the Biodiversity CIF. This is the case, for example, of a project's potential impacts, or the costs (overall or average) that are actually and specifically committed to biodiversity. They also fail to reflect the efforts of the different teams (most notably AES) to maximise the positive impacts of projects. Finally, the coefficients only apply to projects with positive benefits for biodiversity (marked "1" according to the Rio marker for biodiversity) and in no way cover the measures that allowed the limitation of potential negative impacts.

### 3.3.2. Possible errors in the amounts of accounted commitments

Despite the ARB Division's annual review of the Rio marker scoring for biodiversity, the evaluation highlighted various elements that could call into question the reliability of the data provided for calculating AFD's commitments to biodiversity.

- The methodology is not uniformly applied across projects (some projects are not included in the accounting even though they should be).
- The Rio marker may be assigned incorrectly by project managers who are unfamiliar with the related methodology and its impact on the calculation of commitments.
- The list of commitments includes projects that had been discontinued.

In addition, there are numerous inconsistencies between the markers and the databases. For example, various projects with a positive Rio marker value and an "A" rating<sup>10</sup> are missing from the biodiversity commitments list. Despite the existence of a table of equivalence comparing the Rio marker and the sustainable development rating, various projects are accounted under the biodiversity commitments even though they are classified 0 (no impact) by the sustainable development assessment.

<sup>10</sup> Projects ranked as "A" are those rated as having high environmental impacts following the *ex-ante* social and environmental risk analysis.

### 3.4. Effectiveness of the strategic discourse

#### 3.4.1. The tools are generally well-used by project managers but in some cases remain partially operational

Even though consideration of the Exclusion List is not always formalised in project appraisal, it seems to be well integrated into the appraisal process and analysed in most projects, particularly when alternative solutions are readily available. However, it seems that the Exclusion List is not sufficiently precise and actionable to allow for clear identification of which actions AFD refuses to finance. As a result, it does not enable the projects that pose major risks to biodiversity to be systematically dismissed. The lack of clarity mainly involves the following issues: How do we know we are dealing with critical habitats? What does the concept of “destruction” in the Exclusion List mean? Can deforestation be considered as acceptable if compensation measures are put into place?

The assistance provided by the AES Division (and by its equivalent ESG for Proparco) as well as the Sustainable Development Advice and Opinion Unit (ADD) is recognised by project managers, who find the expertise and answers they are looking for when consulting these teams. In addition, project managers find that these consultations have a positive impact on the content of projects during the appraisal stage. Nonetheless, there are multiple obstacles to integrating biodiversity **during the ex-ante analysis and implementation of the ARC sequence.**

- The involvement of the AES/ESG Divisions varies according to the type of project and can intervene late in the project appraisal cycle, thus limiting the possibilities of action.

- The biodiversity risk analysis relies on insufficiently detailed impact assessments that may also arrive late in the project appraisal cycle.

- The lack of specific tools or methodological guides providing concrete examples of the means to reduce potential negative impacts and enhance potential positive impacts within each of AFD Group’s sectoral policies.

The **Sustainable Development Analysis and Opinion** mechanism (ADD), which has gradually been deployed since 2013, is appreciated by project managers and members of AFD’s Board of Directors. It is an operational tool that contributes directly to greater integration of biodiversity issues into all projects by simultaneously reducing potential negative impacts and/or enhancing positive impacts and taking advantage of optimisation opportunities. However, this sustainable development opinion concerns only a limited number of AFD projects (20% of AFD projects relative the pool of relevant projects<sup>11</sup>) and does not concern Proparco projects at all.

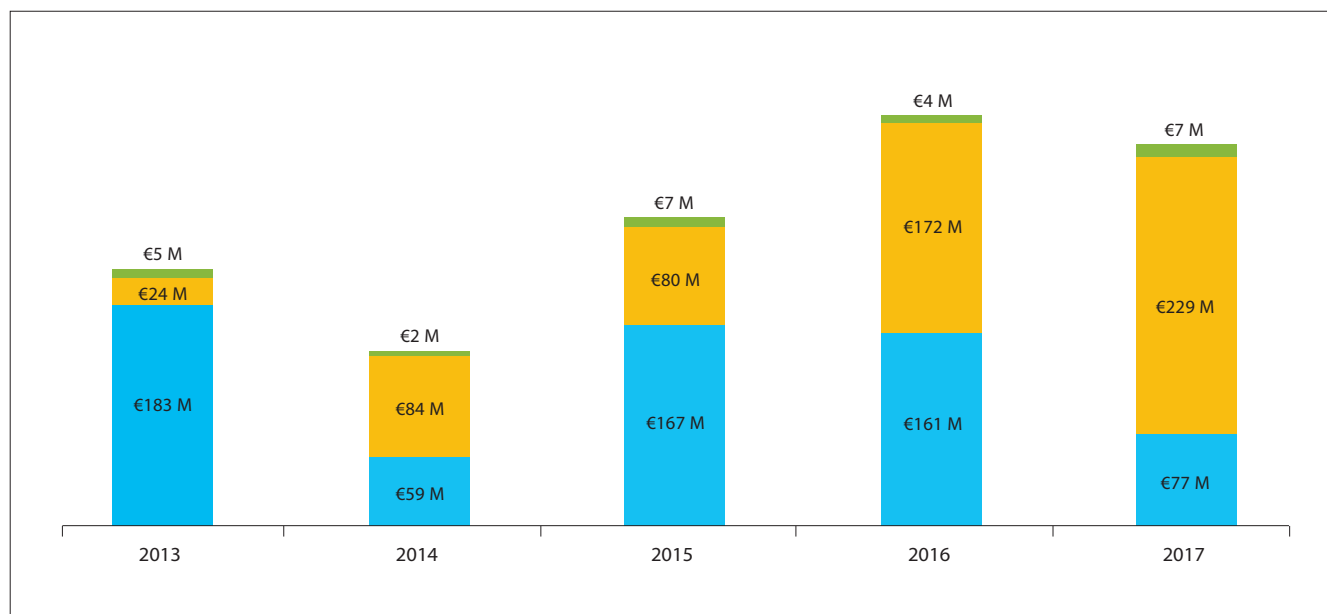
#### 3.4.2. Financial commitments listed in the Biodiversity CIF were largely achieved but do not necessarily show any change in the projects’ content and objectives

A total of 127 projects were reported as contributing to the second cross-cutting objective of the Biodiversity CIF for the 2013–2017 period, which represents 75% of all the projects accounted for in the totality of AFD’s biodiversity commitments.

<sup>11</sup> All projects, except for Proparco, French Facility for Global Environment (FFEM), Fund for Technical Expertise and Experience Transfers (FEXTE), BPIFrance and NGO projects.

Figure 2 – Summary of the authorised commitments in favour of biodiversity 2013–2017<sup>12</sup>

- Objective 3 – Strengthen biodiversity partnerships between France and developing countries
- Objective 2 – Mainstream biodiversity in the development policies
- Objective 1 – To protect, restore, manage ecosystems and share the benefits



Source : EY Analysis based on the document “Bilan CIT Biodiv AFD 2006–2017”

€590 M were committed to the Biodiversity CIF’s second objective between 2013 and 2017, which represents over €117 M per year on average. These amounts can be compared with the annual average of €31.4 M over 2006–2012. The sums allocated to the CIF’s Objective 2 have thus increased significantly when compared to the 2006–2012 period.

The portion of commitments allocated to Objective 2 of the CIF represented only 0.6% of AFD’s total commitments in 2006–2012 versus 1.4% in 2013–2017. This increase is mainly tied to the growth of the average project size and thus to the growth of the average amount of accounted commitment per project between the two periods: rising from an average €3.8 M per project over the period 2006–2012

to €4.6 M per project for the period 2013–2017. Biodiversity commitments are mostly allocated to water sanitation/integrated water resource management (IWRM) and agriculture, while other AFD divisions are not included in the Agency’s biodiversity commitments (energy, transport or education sectors).

It should be noted that the number of projects rated “A” in terms of impacts has been decreasing over the past two years, mainly due to a change in rating rules. These risky projects are implemented in the sectors of transport, energy and water and sanitation. There is no indicator that allows monitoring of the reduction of potentially negative impacts in terms of financial commitments (via the implementation of the ARC sequence).

<sup>12</sup> 2017 Biodiversity CIF Report



### 3.4.3. The integration of biodiversity is progressing in AFD, but it is not yet sufficient to address the issues and little was changed by the implementation of the CIF

The integration of biodiversity is progressing within AFD Group, even if it is not the direct result of the Biodiversity CIF. It was both the implementation of the tools (Sustainable Development Analysis and Opinion, ARC sequence, Exclusion list) and the growing awareness of biodiversity-related issues within AFD that allowed for greater integration of biodiversity issues, most notably at the project appraisal stage.

Nonetheless, this improvement is not enough to address the issues of biodiversity:

- Most AFD project managers and agents state that the best options to “avoid, reduce and compensate” are not systematically implemented in projects.
- 60% of the agents and project managers polled stated that the projects’ potential positive impacts are not systematically promoted within AFD’s overall sectoral policies.
- The influence of integrating biodiversity at the appraisal stage to improve the objectives and content of projects remains difficult to assess for some project managers.
- Over 80% of the AFD agents and project managers who responded to our survey (representing only 31% of the persons contacted) believe that AFD Group does not mainstream biodiversity enough in the projects it finances.

## 3.5. Impact

### 3.5.1. Biodiversity is not perceived as a priority in the Group’s sectoral policies and the real impacts of cross-cutting projects on biodiversity are unknown

Despite the fact that biodiversity mainstreaming is growing, biodiversity **is still not seen as a thematic priority in AFD’s sectoral policies**. This was confirmed by the responses of the agents’ and project managers, who see biodiversity as less of a priority than most of the other themes supported by AFD when compared to climate and poverty reduction. **AFD’s partners and counterparts have a more positive view of the importance given to biodiversity in AFD Group’s sectoral policies**. However, they also see biodiversity as less of a priority than climate and poverty reduction (63% of the respondents consider

biodiversity to be a priority component in all AFD projects).

Finally, the evaluation was not able to determine the positive or negative impacts of the studied projects on biodiversity. In fact, these impacts are not monitored during the implementation of the projects.

### 3.5.2. The Biodiversity CIF was rarely considered in AFD sectoral policies and its implementation was not highlighted in specific communication documents that emphasised achievements

The Biodiversity CIF was scarcely referred to in AFD’s strategic documents such as the different intervention frameworks, whether sectoral or geographic. These conclusions were backed by the results of the surveys: most

agents and project managers found that biodiversity had not been sufficiently integrated into the Group’s sectoral or geographic intervention frameworks. Biodiversity is notably little present in the new AFD Group 2018–2022 Strategy published in August 2018. Biodiversity is nonetheless a high priority for the Interministerial Committee for Cooperation and Development (CICID)<sup>13</sup> (as is climate), which shows the importance of this theme from the standpoint of AFD’s supervisory ministries.

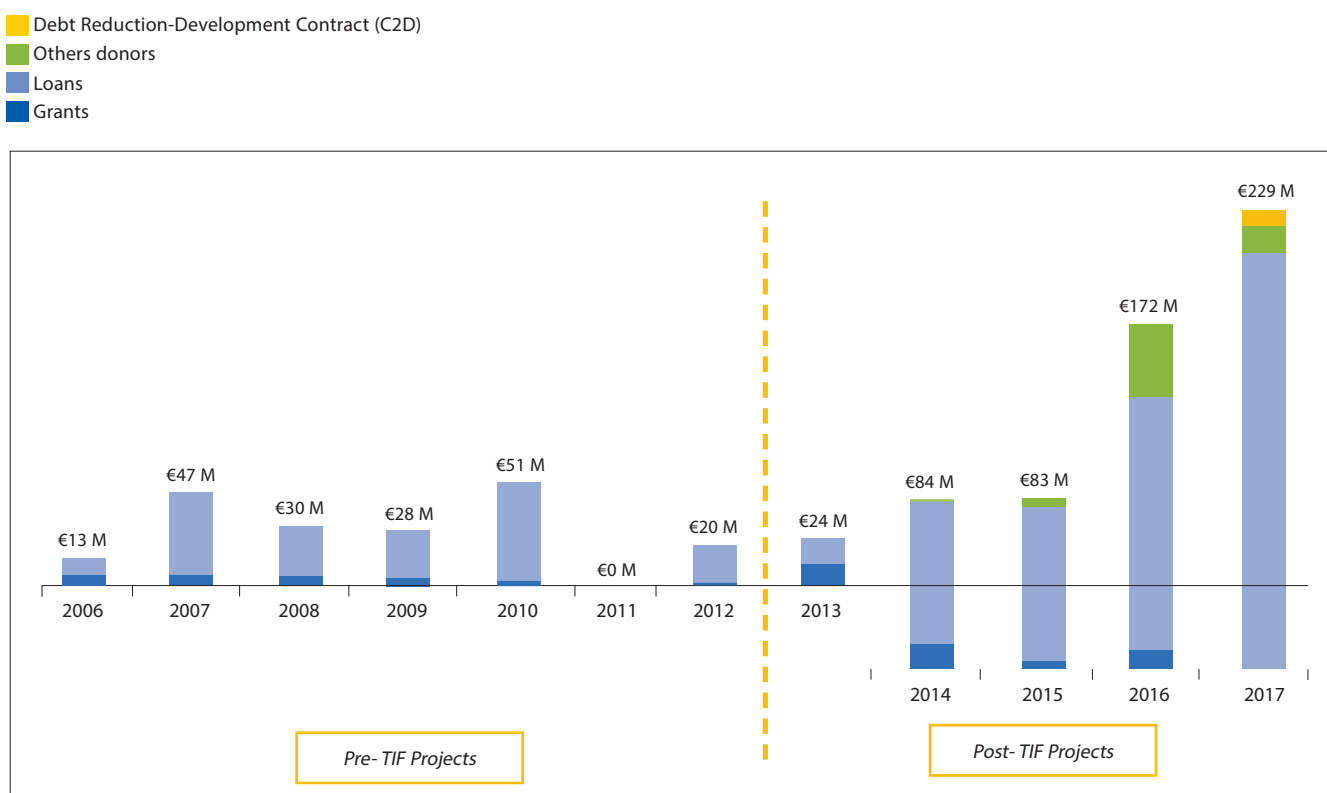
Some publications specific to biodiversity were produced such as, *Développement et Biodiversité : comment négocier le tournant environnemental ?* (Development and Biodiversity: How to negotiate the environmental turning-point?), published in 2015). However, this publication

does not seem to be directly related to the implementation of the Biodiversity CIF. Furthermore, the CIF has not led to the production of specific communication documents to highlight the achievements in terms of biodiversity mainstreaming.

### 3.5.3. Financial instruments to support the biodiversity mainstreaming focus on loans and rare grants

The financial instruments for projects contributing to the Biodiversity CIF’s Objective 2 varied little between 2006–2012 and 2013–2017. **Loans accounted for 81% of the assistance provided in 2013–2017** (87% in the 2006–2012 period) and grants for 9% (13% in the 2006–2012 period).

Figure 3 – Amounts of commitments contributing to Objective 2 of the Biodiversity CIF



Source: EY analysis based on the document « Bilan CIT Biodiv AFD 2006–2017 » .

<sup>13</sup> Statement of Conclusions of the CICID of February 8, 2018.

The Biodiversity CIF **did not therefore drive the development of new financial instruments**. Projects that integrate biodiversity are mostly financed by loans, which may constitute an obstacle to counterparts' mobilisation on the subject. The mobilisation of some grants, notably from the European Union, nonetheless allowed biodiversity-related actions to be integrated into the projects during the 2013-2017 period.

**3.5.4. The Biodiversity CIF is recognised by AFD's counterparts and other AFD Group partners as a positive initiative, but one whose limited results do not allow AFD to take a leading position on the subject**

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Although the counterparts and partners hold a positive

view of the implementation of the Biodiversity CIF for AFD Group's development policy, **less than half of them consider that AFD Group positions itself as a leader on the theme of biodiversity**. According to them, the leading donors (development banks, international organisations...) in the area of biodiversity are the Global Environment Facility (GEF), the French Facility for Global Environment (FFEM), the Kreditanstalt für Wiederaufbau (KfW), the World Bank Group, the International Union for the Conservation of Nature (IUCN) and World Wildlife Fund (WWF). Furthermore, only half of AFD project managers and agents believe that the Biodiversity CIF had an impact on raising the awareness of AFD counterparts and partners about biodiversity.

## 4. Recommendations

The evaluation developed five recommendations based on the conclusions reached:

Organisation / Governance	R1	▶ Ensure management's support to promote biodiversity mainstreaming in all AFD Group's operations.
Strategy	R2	▶ Clarify and strengthen the ambition to mainstream biodiversity into all AFD Group's operations and integrate it into sectoral and geographic strategies
Partner mobilisation	R3	▶ Involve and mobilise project sponsors and clients on biodiversity mainstreaming.
Tools	R4	▶ Strengthen the instruments and tools to operationalise the ambitions of biodiversity mainstreaming within AFD Group.
Accountability	R5	▶ Improve AFD Group's accountability for mainstreaming biodiversity into its operations (including impact monitoring and accounting methodology).

#### 4.1. Recommendation 1: Ensure management's support to promote biodiversity mainstreaming in all AFD Group's operations

##### Ensure the managerial management of the integration of biodiversity into all AFD Group operations

The evaluation showed that the Biodiversity CIF had weak internal leadership and that the roles and responsibilities for its implementation were not clearly defined. This led to a lack of dissemination and promotion, and thus insufficient ownership of the biodiversity mainstreaming strategy by AFD's managers, project managers and agents in operations. Further, although Proparco uses some tools listed in the document, the CIF was not disseminated among the teams. As a result, while biodiversity mainstreaming is increasing within AFD, the Group is not seen as a leader on this theme. Project managers and agents see biodiversity as less of a priority than other subjects (such as gender and climate).

Sub-recommendations	To whom do they apply?
<ul style="list-style-type: none"> <li>▶ <b>Strengthen senior management's support for the ambition to mainstream biodiversity into all Group operations.</b></li> <li>▶ <b>Ensure the involvement of the Executive Committee</b> and formulate clear biodiversity objectives in the letters of objectives sent to the directors (lettres d'objectifs)</li> <li>▶ <b>Ensure managerial leadership</b> internally (via awareness training and actions for managers and the integration of biodiversity into annual objectives).</li> <li>▶ <b>Define the organisation of the support provided to operational staff so that they can mainstream biodiversity</b> into operations (mainly into the search for positive co-benefits, in addition to the support for risk management):                             <ul style="list-style-type: none"> <li>• Clearly define the support given to each subject and the departments/divisions that contribute to its implementation,</li> <li>• Mobilise the required human resources (in terms of quantity and skills),</li> <li>• Appoint and train the biodiversity focal points who will support the operational teams,</li> <li>• Set up an expert body that can be mobilised on specialist biodiversity questions, to ensure a homogenous application of the Group's commitments to biodiversity.</li> </ul> </li> <li>▶ <b>Ensure the upgrading of operational staff's skills and knowledge about biodiversity solutions and best practices</b> (namely via training).</li> <li>▶ <b>Encourage a dynamic, high-level dialogue among the agencies (local AFD or Proparco agencies/offices) and their counterparts in charge of environmental affairs in the intervention countries.</b></li> </ul>	<p style="text-align: center;"><i>Senior management</i></p> <p style="text-align: center;"><i>Executive Committee</i></p> <p style="text-align: center;"><i>All managers</i></p> <p style="text-align: center;"><i>DOE, PRO, AES, ESG, SPC, IRS</i></p> <p style="text-align: center;"><i>AES, ESG DOE, PRO</i></p> <p style="text-align: center;"><i>DOE, PRO</i></p>

## 4.2. Recommendation 2: Clarify and strengthen the ambition to mainstream biodiversity into all AFD Group's operations and integrate it into sectoral and geographic strategies

### Clarify and state the ambition to integrate biodiversity into all AFD Group interventions and its application in the sectoral and geographical strategies

The relevance of the Biodiversity CIF's Objective 2 is recognised by AFD's agents and partners, especially regarding international biodiversity issues. However, its sub-objectives lack clarity and coherence and the budgeted objectives for the 2013–2017 period are not very ambitious. Lastly, biodiversity is rarely integrated into the other current AFD Group strategic documents (Country Intervention Frameworks and Sectoral Intervention Frameworks).

Sub-recommendations	To whom do they apply?
<p>▶ <b>Maintain biodiversity mainstreaming as a core priority objective within AFD Group's sectoral policies.</b></p> <p>▶ <b>Ensure that biodiversity is taken into account in the strategic corpus currently under preparation:</b></p> <ul style="list-style-type: none"> <li>• Provide reminders of the major challenges of biodiversity mainstreaming in the intervention sectors, establish guidelines and convey the Group's ambitions on this subject in the Territorial and Ecological Transition Strategy,</li> <li>• Include biodiversity in the other transitions and strategies (notably in the energy transition) by major geographic area.</li> <li>• Translate the ambitions of biodiversity mainstreaming into all the other sectoral and geographic strategies (namely regional and country strategies).</li> </ul> <p>▶ <b>Define clear and budgeted objectives for the implementation of AFD Group's strategy</b> (as is done for climate objectives) in a concise roadmap, coupled with an appropriate monitoring system (indicators, presentations to the Executive Committee...).</p>	<p>DOE, PRO, SPC</p> <p><i>DOE, PRO, SPC, IRS</i></p> <p><i>DOE, PRO, SPC</i></p>

### 4.3. Recommendation 3: Involve and mobilise project sponsors and clients on biodiversity mainstreaming

#### Commit and involve project owners and customers in the integration of biodiversity

One of the factors impeding the mainstreaming of biodiversity issues into the projects is the difficulty of convincing local project owners and clients to commit to biodiversity preservation. AFD project managers and agents often lack the arguments and means to convince local partners who are not ready to borrow more in order to integrate biodiversity into their projects.

Sub-recommendations	To whom do they apply?
<ul style="list-style-type: none"> <li>▶ <b>Build on support from the authorities</b> of the involved countries that support national biodiversity subjects, as well as from civil society actors, during the project design phase (in addition to the high-level dialogue between local AFD agencies and national authorities).</li> </ul>	DOE, PRO, AES, ESG
<ul style="list-style-type: none"> <li>▶ <b>Assess the context and actors' ecosystem</b> (identify local capacities – country frameworks, project sponsors, research, etc.) upstream of the projects to influence AFD Group's intervention strategy.</li> </ul>	Idem + IRS
<ul style="list-style-type: none"> <li>▶ <b>Develop a discourse to convince project sponsors and clients</b> (notably by providing practical feedback on successful experiences of mainstreaming biodiversity into development projects).</li> </ul>	Idem + EVA + FFEM + SPC + DPA/OSC
<ul style="list-style-type: none"> <li>▶ <b>Develop tools to support the dialogue with project sponsors and clients</b> (and provide, for example, training courses for partners, active participation in conferences, etc.).</li> </ul>	Idem + IRS
<ul style="list-style-type: none"> <li>▶ <b>Develop services</b> (design and analysis capacities, delivery of solutions) and financial tools (policy-based loans for policies that promote biodiversity mainstreaming, EU or other donor grants) <b>to support biodiversity mainstreaming.</b></li> </ul>	Idem + IRS
<ul style="list-style-type: none"> <li>▶ <b>Capitalise on projects' good practices</b> in the countries of intervention (development of positive co-benefits and reduction of negative impacts, inclusion of biodiversity partners in the projects, mobilisation of a specific funding sources).</li> </ul>	DOE, PRO, EVA, IAU
<ul style="list-style-type: none"> <li>▶ <b>Mobilise synergies among projects and ensure the coherence of AFD Group's project portfolio</b> (integrate biodiversity components into projects in other sectors, assistance/skills upgrading projects aimed at the same actors).</li> </ul>	DOE, PRO, EVA, IAU

#### 4.4. Recommendation 4: Strengthen the available instruments and tools to operationalise the ambitions of biodiversity mainstreaming within AFD Group.

##### Strengthen the existing instruments and tools to ensure the effective implementation of biodiversity integration ambitions within the AFD Group

The tools listed in the Biodiversity CIF are not sufficiently actionable to allow the teams to effectively integrate biodiversity issues into their projects.

Sub-recommendations	To whom do they apply?
<p>▶ <b>Provide a biodiversity toolbox to support project managers in different intervention sectors</b> (providing, among other things, elements concerning the biodiversity issues of projects in each sectoral division, examples of negative impact reduction as well as examples of maximising positive impacts for each sector) and provide the necessary support for the mastery of such tools (e.g., through training).</p>	<p><i>DOE, PRO, AES, ESG, IRS</i></p>
<p>▶ <b>Clarify the content of AFD Group's Exclusion List to make it more actionable and ensure a common understanding and harmonised application of the notions used in the List</b> (distinctions between the notions should appear in the Exclusion List or in the toolbox, explanation of the different terms used).</p>	<p><i>DOE, PRO, SPC</i></p>
<p>▶ <b>Seize grant opportunities</b> (such as the Project Start-up, Preparation and Monitoring Facility - FAPS) to support the production of biodiversity studies and especially baseline studies, improve the quality of biodiversity impact studies, and implement actions in favour of biodiversity in all AFD's sectoral policies.</p>	<p><i>DOE, SPC</i></p>
<p>▶ Define more rigorous/restrictive measures for the implementation and monitoring of the action plans (conditions precedent, suspension of disbursements).</p>	<p><i>DOE, PRO, AES, ESG</i></p>
<p>▶ <b>Envisage the application of the Sustainable Development Analysis and Opinion mechanism to wider spectrum of projects.</b></p>	<p><i>DOE, PRO</i></p>
<p>▶ <b>Ensure the archiving and traceability of biodiversity mainstreaming in the processes for project appraisal and use of tools (in line with the Exclusion List, for example) as well as the action plans and the monitoring of their implementation.</b></p>	<p><i>Idem</i></p>



#### 4.5. Recommendation 5: Improve AFD Group's accountability on mainstreaming biodiversity into its operations (including impact monitoring and accounting methodology)

##### Improve AFD Group's accountability for integrating biodiversity into its operations (including impact monitoring and accounting methodology)

The accountability method currently used by AFD presents numerous limitations. It fails to appropriately reflect AFD's financial commitments to biodiversity, and its implementation lacks reliability (project managers know little about the Rio markers for biodiversity and fail to use them correctly; the ARB Division's annual review does not sufficiently improve the reliability of the list of biodiversity commitments). There is no monitoring of the projects' real impacts on biodiversity (be it positive impacts or the reduction of negative impacts).

Sub-recommendations	To whom do they apply?
<p>▶ <b>Conduct a specific study to review the accounting methodology applied by AFD to calculate the Group's biodiversity contributions</b> (relevance of the applied percentages, reporting the reduction of negative impacts, comparison to other donors).</p>	<p>DOE, PRO, SPC, IRS</p>
<p>▶ <b>Broaden and systematise the application of the accounting methodology to all AFD Group commitments</b> (include Proparco in the accounting, apply the same rules to all projects, ensure coherence with other indicators such as Sustainable Development ratings).</p>	<p>DOE, PRO</p>
<p>▶ <b>Explain more clearly and precisely the method for defining the Rio biodiversity markers</b> for AFD project managers and agents, as well as the ways in which these markers are used to calculate the AFD's biodiversity commitments.</p>	<p>DOE, PRO</p>
<p>▶ <b>Define an indicator panel to monitor projects' real positive and negative impacts</b> on biodiversity, which can be mobilised for different AFD projects and could/should be integrated into the action plans.</p>	<p>DOE, PRO, IRS</p>



## Acronyms and abbreviations

ADD	Sustainable Development Analysis and Opinion Unit (AFD)
AES	Environmental, Social and Sustainable Development Support Division AFD)
AFD	Agence Française de Développement (French Development Agency)
ARB	Agriculture, Rural Development and Biodiversity Division (AFD)
ARC	Avoid, reduce, compensate
C2D	Debt Reduction–Development Contract
CBD	Convention on Biological Diversity
CDO	Compliance Department (AFD)
CICID	Comité interministériel pour la coopération internationale et le développement (Interministerial Committee for International Cooperation and Development)
CIF	Cross-cutting Intervention Framework
COP	Conference of the Parties
DAC	Development Assistance Committee (OECD)
DOE	Operations Department (AFD)
DPA	Partnerships Division (AFD)
EAA	Water and Sanitation Division (AFD)
ESG	Environment, Social and Governance Division (Proparco)
ESMP	Environmental and Social Management Plan
EU	European Union
EVA	Evaluation and Knowledge Capitalisation Division (AFD)

E&S	Environmental & Social
FAPS	Project Start-up, Preparation and Monitoring Facility (AFD)
FEXTE	Fund for Technical Expertise and Experience Transfers (AFD)
FFEM	Fonds Français pour l'Environnement Mondial (French Facility for Global Environment)
GD	General Directorate
GEF	Global Environment Facility
IAU	Impact Assessment Unit (Proparco)
IFC	International Finance Corporation (World Bank subsidiary dedicated to private sector funding)
IRS	Innovation, Research and Knowledge Department (AFD)
IUCN	International Union for the Conservation of Nature
IWRM	Integrated Water Resource Management
KfW	Kreditanstalt für Wiederaufbau (German Bank for Development)
M	Million
MEAE	Ministère de l'Europe et des Affaires étrangères (French Ministry for Europe and Foreign Affairs)
MTES	Ministère de la Transition écologique et solidaire (French Ministry for the Ecological and Inclusive Transition)
NGO	Non-governmental organisation
ODA	Official development assistance
OECD	Organisation for Economic Co-operation and Development
OSC	Civil Society Division (AFD)
PRO	Proparco (AFD's private-sector financing subsidiary )
SD	Sustainable development

SIF Strategic Intervention Framework

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SPC Strategy, Partnerships and Communication Department (AFD)

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USAID United States Agency for International Development

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WWF World Wildlife Fund

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