

**Validated Terminal Review of the UNEP/GEF
Project “Strengthening Access and Benefit Sharing
(ABS)” (GEF ID 5744 / SMA ID 28965)**

2016 – 2023



**global
environment
facility**
INVESTING IN OUR PLANET



DEPARTMENT OF
**ENVIRONMENTAL
PLANNING &
PROTECTION**



UNEP ECOSYSTEMS DIVISION
Validation Date: March 2026

**Photo Credits:**

Front cover: Nassau, The Bahamas, 2025

© UNEP/Maria de Lourdes Torres, United Nations Environment Programme, Review Mission (2025)

This report has been prepared by an external consultant as part of a Terminal Review, which is a management-led process to assess performance at the project's operational completion. The UNEP Evaluation Office provides templates and tools to support the review process and provides a formal assessment of the quality of the Review Report, which is provided within this report's annexed material. In addition, the Evaluation Office formally validates the report by ensuring that the performance judgments made are consistent with evidence presented in the Review Report and in-line with the performance standards set out for independent evaluations. As such, the project performance ratings presented in the Review Report may be adjusted by the Evaluation Office. The findings and conclusions expressed herein do not necessarily reflect the views of Member States or the UN Environment Programme Senior Management.

For further information on this report, please contact:

UNEP Ecosystems Division
BD/LD GEF Unit
Christopher Cox
christopher.cox@un.org

Strengthening Access and Benefit Sharing (ABS) in The Bahamas
GEF ID 5744 / SMA ID 28965
11/2025
All rights reserved.
© (2025) UNEP

ACKNOWLEDGEMENTS

This Terminal Review was prepared for the UNEP Ecosystems Division/GEF Biodiversity and Land Degradation Unit by Maria de Lourdes Torres.

The reviewer would like to express her gratitude to all persons met and who contributed to this review, as listed in Annex III.

The reviewer would like to thank the project team, especially the task manager, Christopher Cox, for his collaboration throughout the review process, Gloritzel Frangakis Cano, senior program assistant (UNEP), for her operational and administrative support, and George Saddimbah, fund management officer, for the insightful information shared about the project.

She also expresses sincere thanks to Ces Colarina (Project Manager) for all her support throughout the Terminal Review and her contribution to a successful visit to The Bahamas. Special thanks to Director Rhianna Neely-Murphy (DEPP) for her contribution to this review. Thanks also to the members of the Steering Committee for their openness to sharing their experiences on the project. The reviewer would also like to thank the researchers from different institutions for their valuable comments and information shared.

The reviewer sincerely thanks all the individual informants from different institutions who gave their time to be interviewed, talk about their experiences, and express their opinions.

The review consultant hopes that the findings, conclusions, and recommendations will contribute to the successful closure of the project, and if possible, to the formulation of a next phase and the continuous improvement of similar projects in other countries and regions.

BRIEF EXTERNAL CONSULTANT BIOGRAPHY

Maria de Lourdes Torres is a molecular biologist, professor, and researcher at the Universidad San Francisco de Quito, Ecuador. Beside her academic activities and research projects—mainly related to the conservation of relevant species of Ecuadorian biodiversity—she has over 20 years of experience in biosafety and genetic resources issues. As an advisor and consultant, she has developed policies and draft laws and regulations in the field of biosafety, genetic resources, and food sovereignty. She has advised in the development of national biosafety frameworks and has evaluated and implemented projects and activities in these fields. Torres has been the official delegate for Ecuador on several occasions in the discussions of various topics within the Cartagena Protocol, Convention on Biological Diversity. For several years she has worked as regional advisor for Latin America within BCH capacity-building projects. She also has expertise in the field of access to genetic resources and their regulations.

ABOUT THE REVIEW

Joint Review: No

Report Language(s): English.

Review Type: Terminal Review

Brief Description:

This report is a Terminal Review of a UNEP/GEF project: “Strengthening Access and Benefit Sharing (ABS) in The Bahamas”, which lasted from 2016 to 2024. The project's objective was to create and apply the enabling conditions for fair and equitable access and benefit sharing to ensure that an effective ABS regime is in place. The review sought to assess project performance (in terms of relevance, effectiveness, and efficiency), and to determine the outcomes and impacts (actual and potential) derived from the project, including its sustainability. The review has two main objectives: i) provide evidence of results to meet accountability requirements, and (ii) promote operational improvement, learning, and knowledge sharing through results and lessons learned among UNEP and the Department of Environmental Planning and Protection (DEPP) within the Ministry of the Environment and Natural Resources of The Bahamas. Data were collected through in-depth interviews (virtual and in person), document reviews, and a visit to The Bahamas. Analysis used triangulated data to assess performance against a reconstructed Theory of Change and its causal pathways. With an overall performance rating of 4.11 –corresponding to the fourth point on a six-point scale—the project was assessed as moderately satisfactory. The main findings include: (i) accession to the Nagoya Protocol, (ii) adoption of the ABS Act, and (iii) establishment of an online permitting system. These milestones highlight significant legal and institutional progress, positioning The Bahamas as a leader in ABS governance in the Caribbean. A key lesson is the importance of sustained government commitment and institutional leadership to consolidate ABS implementation. The central roles of DEPP and coordinated legal drafting were vital, though continued support and coordination are necessary to maintain momentum. Recommendations include the following: (1) for DEPP to address the technical issues of the ABS online permitting system and provide clear guidance to system users; (2) for DEPP to consider reconvening the ABS Committee to review operational needs, strengthen communication with researchers, and improve inclusion of local communities; and (3) for UNEP to consider using The Bahamas’ ABS experience as a reference case in regional knowledge-sharing efforts to support countries establishing or strengthening ABS systems.

Source(s) of Funding by Country: The Bahamas

Source(s) of Funding by Institution Type:

Foundation/NGO	No
Private Sector	No
UN Body	Yes
Multilateral Fund	Yes
Environment Fund	Yes

Key words: Access and Benefit Sharing (ABS), Genetic Resources, Biodiversity, Traditional Knowledge, Mutually Agreed Terms, Prior Informed Consent.

Primary data collection period: July – November 2025

Field mission dates: 28 September – 3 October 2025.

TABLE OF CONTENTS

ACKNOWLEDGEMENTS	iii
BRIEF EXTERNAL CONSULTANT BIOGRAPHY	iv
ABOUT THE REVIEW	v
TABLE OF CONTENTS	vi
LIST OF ACRONYMS	vii
PROJECT IDENTIFICATION TABLE	viii
EXECUTIVE SUMMARY	1
I. THE PROJECT	6
A. Context	6
B. Results Framework.....	7
C. Project Implementation Structure and Partners	9
D. Stakeholders	10
E. Changes in Design During Implementation	12
F. Project Financing.....	12
II. REVIEW METHODS	14
A. UNEP's Review Approach.....	14
B. Data Collection	15
C. Data Analysis	17
D. Limitations and Mitigation Strategies	18
E. Ethical Considerations	18
III. THEORY OF CHANGE AT REVIEW	19
IV. REVIEW FINDINGS	25
A. Strategic Relevance.....	25
B. Quality of Project Design.....	28
C. Nature of the External Context	30
D. Effectiveness	31
E. Financial Management.....	45
F. Efficiency.....	48
G. Monitoring and Reporting	50
H. Sustainability	51
I. Factors Affecting Performance and Cross-Cutting Issues.....	53
V. CONCLUSIONS AND RECOMMENDATIONS	58
A. Conclusions	58
B. Lessons Learned	69
C. Recommendations	71
Annex I. RESPONSE TO STAKEHOLDER COMMENTS	73
Annex II. REVIEW FRAMEWORK	74
Annex III. STAKEHOLDERS CONSULTED DURING THE REVIEW	80
Annex IV. KEY DOCUMENTS CONSULTED	81
Annex V. REVIEW ITINERARY	83
Annex VI. ENVIRONMENTAL AND SOCIAL SAFEGUARDS ASSESSMENT	84
Annex VII. COMMUNICATION AND OUTREACH TOOLS	86
Annex VIII. BRIEF CV OF THE REVIEWER	91
ANNEX IX. GEF PORTAL INPUTS (FOR GEF FUNDED PROJECTS)	93
Annex X: IMPLEMENTATION PLAN OF RECOMMENDATIONS	98
Annex XI. QUALITY ASSESSMENT OF THE REVIEW REPORT	101

LIST OF ACRONYMS

ABS	Access and Benefit Sharing
AMMC	Antiquities, Monuments and Museum Corporation
BAMSI	Bahamas Agriculture and Marine Science Institute
BD	Biodiversity
BNT	Bahamas National Trust
CARICOM	Caribbean Community
CBD	Convention on Biological Diversity
DEPP	Department of Environmental Planning and Protection
DMR	Department of Marine Resources
EA	Executing Agency
ESS	Environmental and Social Safeguards
GEF	Global Environment Facility
GIZ	Deutsche Gesellschaft für Internationale Zusammenarbeit, German Technical Cooperation
IA	Implementing Agency
IT	Information Technology
KAP	Knowledge, Attitude and Practices
MAT	Mutually Agreed Terms
MTR	Mid-Term Review
NP	Nagoya Protocol
OAG	Office of the Attorney General
PER	Periodic Expenditure Report
PIC	Prior Informed Consent
PIR	Project Implementation Report
PMU	Project Management Unit
POW	Programme of Work
ProDoc	Project Document
PSC	Project Steering Committee
TOC	Theory of Change
TOR	Terms of Reference
TR	Terminal Review
UB	University of the Bahamas
UNEP	United Nations Environment Programme

PROJECT IDENTIFICATION TABLE

Table 1: Project Identification Table

GEF Project ID/SMA ID ¹ :	5744 / 28965		
Type of GEF Project:	Child: N	Global Coordinating Project:	N
	If yes, provide GEF Programme ² ID:	Medium-Size Project or Full-Size Project:	MSP
UNEP Management (Division/Branch/Unit):	Ecosystems Division/Biodiversity and Land Branch/GEF Biodiversity and Land Degradation Unit	Executing Agency: <i>(indicate if internally executed)</i> :	Department of Environmental Planning and Protection (DEPP)
Sources of Funding (Co-finance):	Country ³ (ies): The Bahamas	Institution ⁴ Name/Type: • DEPP - Government • University of the Bahamas - Other • Law Offices of Pericles Maillis - private sector • GIZ, GmbH (Germany) - Government • UNEP - UN Body	
Relevant SDG(s):	SDG 15 Life on Land		
MTS (at approval):	2014-2017 Medium Term Strategy		
POW Direct Outcome(s) number/reference ⁵ <i>(applicable for projects approved from 2022)</i> : OR POW Output(s) number/reference <i>(applicable for projects approved pre-2022)</i>	POW Direct Outcome:	MTS 2025 Outcome(s) number/reference <i>(applicable for projects approved from 2022)</i> : OR POW Expected Accomplishment(s) number/reference <i>(applicable for projects approved pre-2022)</i> :	MTS 2025 Outcome:
	POW Output:		POW Expected Accomplishment: 2016-17; 2018-19; 2020-21
Sub-programme:	Nature Action	Programme Coordination Project (if relevant):	Governance and Accountability for Biodiversity
UNEP approval date:	05/11/2015	GEF approval date:	23/02/2016
GEF Operational Programme/ Cycle # (e.g. GEF-7):	GEF-5	GEF Strategic Priority (e.g. BD4):	BD -4

¹ SMA refers to the ID provided by the Integrated Planning, Management and Reporting Solution (IPMR) system, which was introduced by UNEP in July 2023. Previously, it was referred to as a PIMS ID number.

² GEF Programme refers to 'Parent' project.

³ Where applicable, list countries who have provided project funds and/or co-finance.

⁴ Indicate where funding institutions are any/all of the following: Foundation/NGO; Private Sector; UN Body; Multilateral Fund; Environment Fund.

⁵ For these items do not include full text; only enter the number or reference.

Focal Area(s):	Biodiversity		
Expected start date: ⁶	23/02/2016	Actual start date: ⁷	11/04/2016
Planned completion date:	30/04/2022	Actual operational completion date:	31/12/2023
Planned project budget at approval:	GEF grant allocation: 1,900,000		
	Expected co-financing: Cash: 1,000,000 In-kind: 1,042,292		
	Total planned budget: 3,942,292		
Actual expenditures reported (cash only):	GEF grant expenditures reported as of 31/03/2024: 1,797,045.25		
	Actual co-financing 31/12/2023: 1,681,604 (cash); 1,047,292 (in-kind)		
	Total actual expenditures reported as of 31/12/2023: 4,525,941.25		
No. of formal project revisions:	N/A	Date of last approved project revision:	17/03/2024 (budget rev)
No. of Steering Committee meetings:	25	Date of Last Steering Committee meeting:	12/10/2023
Mid-term Review/ Evaluation ⁸ (required or not required):	UNEP requirement:	☒ Y	Mid-term Review/ Evaluation actual date: 14/08/2021
	GEF requirement:	☐ N	
Terminal Evaluation (planned date):	01/12/2023	Terminal Evaluation actual date:	
Coverage - Country(ies):	The Bahamas	Coverage - Region(s):	Latin America and the Caribbean
Dates of previous project phases:	n/a	Status of future project phases:	n/a

⁶ Expected/planned dates are listed in the Project Document (ProDoc).

⁷ Actual start date is the date of the last signature on the PCA or ICA.

⁸ UNEP projects with a duration of four or more years require an MTR unless there is an exceptional circumstance. See the *Evaluation in the Project Cycle* section in the [Evaluation Office's operational manual](#). Donor requirements may vary and should be considered in conjunction with UNEP's requirements.

EXECUTIVE SUMMARY

Project background

1. This document presents the Terminal Review (TR) of the UN Environment Programme (UNEP)/Global Environment Facility (GEF) project “*Strengthening Access and Benefit Sharing (ABS) in The Bahamas.*” The review was conducted between July and November 2025 by the consultant, Maria de Lourdes Torres. The project was approved in 2016, and while some initial activities took place shortly thereafter, full implementation did not begin until 2019 and continued through 2023. The project officially closed in April 2024. UNEP served as the Implementing Agency (IA), and the Department of Environmental Planning and Protection (DEPP) —formerly the BEST Commission—acted as the Executing Agency (EA) responsible for technical and administrative coordination. The total project budget at closure was USD 4,525,151.72, including USD 1,796,255.72 in GEF financing and USD 2,728,896 in co-financing, primarily from government institutions in The Bahamas. Actual co-financing exceeded original commitments (USD 2,042,292).
2. The objective of the project was to create and apply the enabling conditions for fair and equitable access and benefit sharing to ensure that an effective ABS regime is in place. In this regard, the project supported The Bahamas in developing the legal, administrative, and institutional framework required for the governance of genetic resources. The project implemented its activities through three components: (1) National Strategy on ABS and accession to the Nagoya Protocol; (2) National enabling environment for the implementation of the Nagoya Protocol; and (3) Applied ABS arrangements in The Bahamas. The project directly contributed to The Bahamas’ accession to the Nagoya Protocol in December 2021, the approval of the *Biological Resources and Traditional Knowledge Act, 2021* (hereinafter referred to as the ABS Act), and the development of the ABS online permitting system, which together form the foundational structure for the country’s ABS regime.

This Review

3. In line with the UNEP Evaluation Policy and the UNEP Programme and the Guidelines for GEF Agencies on Conducting Evaluations, this TR assessed the project’s performance in terms of relevance, effectiveness, and efficiency, and examined the outcomes achieved and their likely sustainability. The review applied the standard UNEP-EOU evaluation criteria and the six-point rating scale. The purpose of the review is twofold: (i) to provide evidence of results for accountability to UNEP, GEF, and national counterparts; and (ii) to support learning and adaptive improvement among UNEP and the Department of Environmental Planning and Protection (DEPP), particularly regarding future ABS implementation efforts. The review also identifies lessons learned and forward-looking recommendations, with the aim of informing ongoing national operationalization of the ABS framework and contributing to knowledge sharing across other countries advancing ABS regimes.
4. Data collection for this TR included semi-structured interviews, document review, and an in-country mission to The Bahamas. Interviews were conducted with key institutions involved in project implementation and stakeholders engaged at different stages of the ABS framework development. Some interviews were carried out in person and others virtually, before, during, and after the mission period. The review triangulated evidence from interviews, project reports, legal and policy documents, and other project records to validate findings and assess progress toward results. Data analysis was organized according to the evaluation criteria and informed by the project’s reconstructed Theory of Change, supporting the assessment of causal pathways, enabling conditions, and the sustainability of outcomes. Coordination with the Project Manager and UNEP facilitated access to relevant information and supported a transparent review process.

Key findings and performance ratings

5. The project demonstrated strong performance in establishing the legal and institutional foundations for ABS in The Bahamas, notably through the accession to the Nagoya Protocol, the adoption of the ABS Act, and the development of the online permitting system. These achievements reflect solid national ownership and effective coordination among key government institutions during the core phases of legal drafting. The project also contributed to increased institutional awareness of ABS principles and initiated scientific work to support evidence-based decision-making. However, several areas would have benefited from further attention, particularly the sustained engagement of academic researchers and community actors during the operationalization phase, the expansion and continuity of awareness activities across sectors, and the technical maintenance and practical usability of the online permitting system. Strengthening these elements will be essential for achieving full and lasting operationalization of ABS in practice.
6. The Terminal Review identified the following set of findings that reflect the project's achievements, operational experience, and areas that may require continued attention to support the long-term implementation of the ABS framework in The Bahamas. These findings provide insight into the project's relevance, effectiveness, efficiency, sustainability, stakeholder engagement, gender considerations, safeguards, and institutional performance.
 - The project was aligned with UNEP's strategic priorities, GEF objectives, and national biodiversity governance needs, directly supporting the implementation of the Nagoya Protocol.
 - The project contributed to regional knowledge exchange and complemented ongoing ABS efforts in the Caribbean.
 - The project successfully established the national ABS framework, including accession to the Nagoya Protocol, approval of the ABS Act, and the development of an online permitting system.
 - Institutional capacities for ABS administration were strengthened, particularly within the authority responsible for permit oversight; however, communication with researchers and academic institutions was not sufficiently sustained, affecting clarity and acceptance of procedures.
 - Awareness of ABS concepts increased at the institutional level, but continued capacity building and broader stakeholder engagement are necessary for full operationalization of the ABS system.
 - The project complied with UNEP's financial standards, with no cases of mismanagement or irregularities observed.
 - Financial documentation and reporting were complete and well-structured, enabling effective oversight and adaptive financial management.
 - The project experienced delays and required two no-cost extensions; however, core outputs were completed within the approved budget.
 - Project coordination adapted effectively to administrative changes and COVID-19 related disruptions, maintaining progress toward key outcomes.
 - Monitoring and reporting functioned effectively and enabled timely adjustments. However, assessment of the operational use of the ABS framework was constrained because the system became functional late in the project cycle, leaving limited implementation time for evaluation. This reflects a project design and

sequencing limitation rather than a monitoring failure and had been previously identified in technical reporting.

- Women were well-represented in institutional and decision-making roles, though this reflected existing staffing rather than a deliberate gender mainstreaming approach. Engagement with community-level actors was limited.
- Political ownership of the ABS framework is strong; however, coordination among ABS institutions has weakened since project closure.
- The ABS permitting system requires robust ongoing IT support and dedicated staffing to ensure functionality, user access, and continuity.
- The legal and institutional framework for ABS is in place but sustained inter-agency coordination will be necessary to translate it into a fully operational regime.
- Project management effectively coordinated inputs and maintained momentum despite administrative challenges and the COVID-19 pandemic.
- Government institutions, primarily through the Steering Committee and technical working teams, maintained consistent engagement during implementation. In contrast, participation from academic researchers and community stakeholders was more limited and irregular, reducing opportunities for broader dialogue and meaningful involvement.
- Women's leadership in ABS processes was notable, but this reflected existing institutional structures rather than a specific project strategy. Engagement with marginalized, people with disabilities or community groups was not systematically integrated.
- The project had a low environmental and social risk profile, and no safeguard-related concerns emerged during implementation.

Table 2: Summary of project ratings

Criterion	Rating
Strategic Relevance	S
Quality of Project Design	MS
Nature of External Context	MU
Effectiveness	S
Financial Management	S
Efficiency	MS
Monitoring and Reporting	MS
Sustainability	ML
Factors Affecting Performance	MS
Overall Project Performance Rating	MS

Conclusions summary

7. Overall, the project performed at a *Moderately Satisfactory* level. The project achieved significant progress in establishing the foundational legal and institutional framework required to implement Access and Benefit-Sharing (ABS) in The Bahamas. The accession to the Nagoya Protocol, enactment of the ABS Act (2021), and the creation of the national online permitting system represent major governance milestones and position The Bahamas among the Caribbean countries that have advanced most substantially in ABS system development. These achievements demonstrate clear alignment with national priorities on biodiversity governance and UNEP-GEF objectives.
8. The strongest performing aspects of the project were the high level of government ownership during key decision-making stages, the commitment of DEPP as the national

lead, and the effective inter-institution coordination that enabled legislative and institutional outcomes to be finalized. The project also demonstrated adaptive management in response to administrative challenges and the COVID-19 pandemic, which allowed implementation to continue and deliver core outputs without requiring additional financial resources. In addition, high female participation in institutional leadership roles contributed positively to coordination, policy drafting, and national oversight processes.

9. Comparative weaknesses were observed in the depth and continuity of engagement with stakeholders beyond government institutions, particularly academic researchers and local community actors. While awareness-raising activities were indeed carried out, they were not sustained throughout the project's implementation. Consequently, they did not foster continued engagement or broader participation from a wider range of actors. The project did not incorporate structured measures for community engagement or gender mainstreaming, largely due to its gender-blind design and the inherently institutional nature of the intervention. This limited the extent to which broader participation and more inclusive decision-making could be promoted. Researchers expressed concerns over procedural clarity, fee structures, and the problems this may pose for carrying out their scientific projects and collaborations. To ensure long-term sustainability, continued government support will be required to strengthen the functionality of the permitting system, reactivate inter-institution coordination mechanisms, particularly the ABS Committee— and engage a wider range of stakeholders to support effective, accessible, and equitable implementation moving forward, with immediate attention required for restoring and stabilizing system functionality.
10. In relation to the strategic questions for the Terminal Review set out in the Terms of Reference: (i) Strategic Question 1 finds that the project achieved strong awareness of the national ABS framework among core regulatory and government institutions, while initial awareness was also raised among researchers, private sector users, and local knowledge holders, providing a basis for further engagement; (ii) Strategic Question 2 indicates that the ABS research permitting system established by the project remains legally in place and has been applied in practice, although the temporary reliance on manual processing following technical challenges with the electronic platform has affected efficiency; (iii) Strategic Question 3 shows that the national ABS framework has been successfully established and recognized institutionally, creating the enabling conditions for future benefit-sharing opportunities with local and traditional knowledge holders, even though tangible benefits have not yet materialized; and (iv) Strategic Question 4 highlights that while the legislative and institutional foundations of the ABS framework are in place, its long-term financial sustainability will benefit from continued government commitment, particularly to support system maintenance and operational follow-up.

Lessons Learned

11. Lesson 1. High-level political support is critical for enabling the adoption of legal instruments.
12. Lesson 2. Sustained political commitment and clear institutional leadership are essential to establishing and maintaining a functional ABS regime.
13. Lesson 3. Broad stakeholder engagement, including explicit consideration of gender and human rights dimensions, is essential not only during legal drafting but also throughout the operationalization of ABS systems.

14. Lesson 4. The establishment of a national ABS online permitting system was a major achievement, but sustained technical support and clear procedural guidance are required to ensure effective use.
15. Lesson 5. Pilot activities must be brought to full implementation to generate practical ABS experience and support operational uptake.
16. Lesson 6. Public awareness and communication strategies must be continuous, multi-sectoral, and inclusive to support sustained ABS implementation.

Recommendations

17. Recommendation 1. It is recommended that DEPP address the technical issues of the ABS online permitting system and provide clear guidance to system users, including introducing a streamlined permit renewal process that avoids requiring new applications for ongoing or multi-year research activities, as a matter of immediate priority.
18. Recommendation 2. It is recommended that DEPP reconvene the ABS Committee—as mandated by national ABS legislation—to assess the actions needed to sustain the project’s achievements, review the permitting system requirements, and introduce improvements that address the concerns raised by the research sector while strengthening inclusion, communication, and consideration of gender and human rights dimensions in engagement with local communities. Reactivating regular Committee meetings will be essential to support the continued implementation of the ABS framework.
19. Recommendation 3. UNEP is encouraged to consider using the ABS experience in The Bahamas—the first country globally to develop and operationalize an online ABS permitting system—as a reference case in regional knowledge-sharing and capacity-building efforts, including ongoing initiatives such as the GEF ABS Project in Saint Lucia (Project 10840). Highlighting the legal and institutional achievements, as well as the lessons learned during the system’s operationalization, can support peer learning and provide a practical example for countries in the Caribbean and Latin America that are in the process of establishing or strengthening their ABS systems and digital access procedures. This experience offers a concrete and scalable model that could inform future ABS project design and implementation under the UNEP–GEF portfolio.

Validation

The report has been subject to an independent validation exercise performed by UNEP’s Evaluation Office. The performance ratings for the UNEP project: “Strengthening Access and Benefit Sharing (ABS) in The Bahamas”, set out in the Conclusions and Recommendations section, have been/have not been adjusted as a result. The overall project performance is validated at the **‘Moderately Satisfactory’** level. Moreover, the Evaluation Office has found the overall quality of the report to be Satisfactory (see Annex XI).

I. THE PROJECT

A. Context

Intervention context

20. The Bahamas is the largest small-island archipelago in the tropical Atlantic, similar in size and complexity to the entire Lesser Antilles. The size, complexity, and ecological isolation of The Bahamas have contributed to significant biodiversity and the development of several unique ecosystems. The Bahamas, as a Small Island Developing State (SIDS) country, is a globally recognized biodiversity hotspot. The geographic complexity and isolated nature of The Bahamas have led to the development of extremely high levels of endemism in this hotspot with at least 1,111 species of vascular plants, of which 10.6% are endemic and 5.2% are threatened. The Bahamas has some 406 known species of amphibians, birds, mammals, and reptiles according to figures from the World Conservation Monitoring Centre.
21. The Commonwealth of The Bahamas is a signatory to several multilateral environmental agreements, such as the Convention on Biological Diversity (CBD)—which supports the conservation of biological resources, sustainable use, and the fair and equitable sharing of genetic resources—and the United Nations Framework Convention on Climate Change (UNFCCC), which aims to mainstream such conventions into national policy development and planning.
22. Considering the above, this “Strengthening Access and Benefit Sharing (ABS) in The Bahamas” project sought to address the lack of an operational national legal, policy, and institutional framework that would enable The Bahamas to effectively implement the provisions and obligations set out in the Nagoya Protocol on ABS. The policy and institutional framework in place in The Bahamas prior to the initiation of this project was not conducive to harnessing the potential value of the country's genetic resources and associated traditional knowledge. This situation could have been a barrier to fostering innovation, biodiversity conservation, and the establishment of fair and equitable ABS agreements and partnerships. In this context, the objective of the project was to create and implement conditions conducive to fair and equitable access and benefit sharing to ensure that an effective ABS regime is in place.

Institutional context

23. The project was approved as a Medium Size Project by the GEF on February 2016, and by UNEP in April 2016, for a period of 36 months. Between 2016 and 2018, the project was not implemented due to a series of administrative and political difficulties, but in March 2019 the Government of The Bahamas requested a three-year no-cost extension which was granted, and the project was relaunched in June 2019 and ended in December 2023, accomplishing to a large extent its objectives. During the actual implementation of the project, challenges posed by the COVID-19 pandemic had to be overcome, which required rethinking several planned activities and delivering them virtually.
24. The project aligns with the GEF's and UNEP's strategic programs, applicable at the time of project design. The project is generally consistent with the GEF Biodiversity Focal Area, with UNEP's Strategic Focus on Ecosystem Management (Expected Accomplishment (a)) and Environmental Governance (Expected Accomplishment (b)), and specifically with Aichi Targets 2, 16, and 17, as defined in the UNEP Medium Term Strategy 2014-2017. The project also specifically aligns with UNEP 2014-2015 Programme of Work (POW), which seeks to help countries, upon their request, to strengthen their environmental institutions and laws and to implement their national

environmental policies, and to increase the integration of environmental sustainability in national and regional policies and plans; as well as with Sub-programme 4, Expected Accomplishment (b) of UNEP's 2016-2017 POW, in which UNEP seeks to enhance the capacity of countries to develop and enforce laws and strengthen institutions to achieve internationally agreed environmental objectives and goals and comply with related obligations. The project is in full alignment with Articles 5, 6, 9, and 15 of the Nagoya Protocol.

25. UNEP's Ecosystems Division via the GEF Biodiversity and Land Degradation Unit was the GEF Agency (or Implementing Agency, IA) responsible for the coordination and overall project supervision, and the Department of Environmental Planning and Protection (DEPP) was the project's Executing Agency (EA). DEPP was responsible for day-to-day project execution through the support of the Project Manager and consultants as appropriate. DEPP was also responsible for all the project's administrative, management, and financial activities. The project had a total secured budget of \$4,628,895.80, of which \$1,900,000 came from the GEF Trust Fund and \$2,728,895.80 from co-financing sources, as indicated in the ABS Final Report (07/2024). A mid-term review was conducted in August 2021.

B. Results Framework

26. The ABS Project in The Bahamas was structured to create the enabling conditions for the establishment of a fair and equitable access and benefit-sharing (ABS) regime, consistent with the objectives of the Nagoya Protocol. The project's results hierarchy, as set out in the ProDoc, positioned the overall objective at strengthening national capacity to regulate access to genetic resources and to ensure equitable sharing of benefits derived from their use. The outcomes included the establishment of a professional and transparent ABS system, the development of procedures and mechanisms for access applications, and the creation of opportunities—both monetary and non-monetary—that incentivize biodiversity conservation (Table 3). Collectively, these results were designed to ensure that ABS principles are not only adopted but also effectively implemented through enforceable frameworks and informed stakeholder participation.
27. To deliver against this results framework, the project combined technical, legal, and institutional components. Policy and legal development provided the foundation for operationalizing ABS, while capacity-building activities aimed to improve the ability of national institutions and stakeholders to apply the framework in practice. Efforts were made to engage stakeholders and raise awareness to ensure that communities, research institutions, and private sector actors understood their roles and responsibilities in the ABS system. Management and coordination activities were undertaken to attain coherence among planned activities, aligning them with the project's objective and ensuring that results at the component level contributed directly to the intended impact of a functioning, nationally coordinated ABS regime.

Table 3: Summary of the project's latest approved results framework

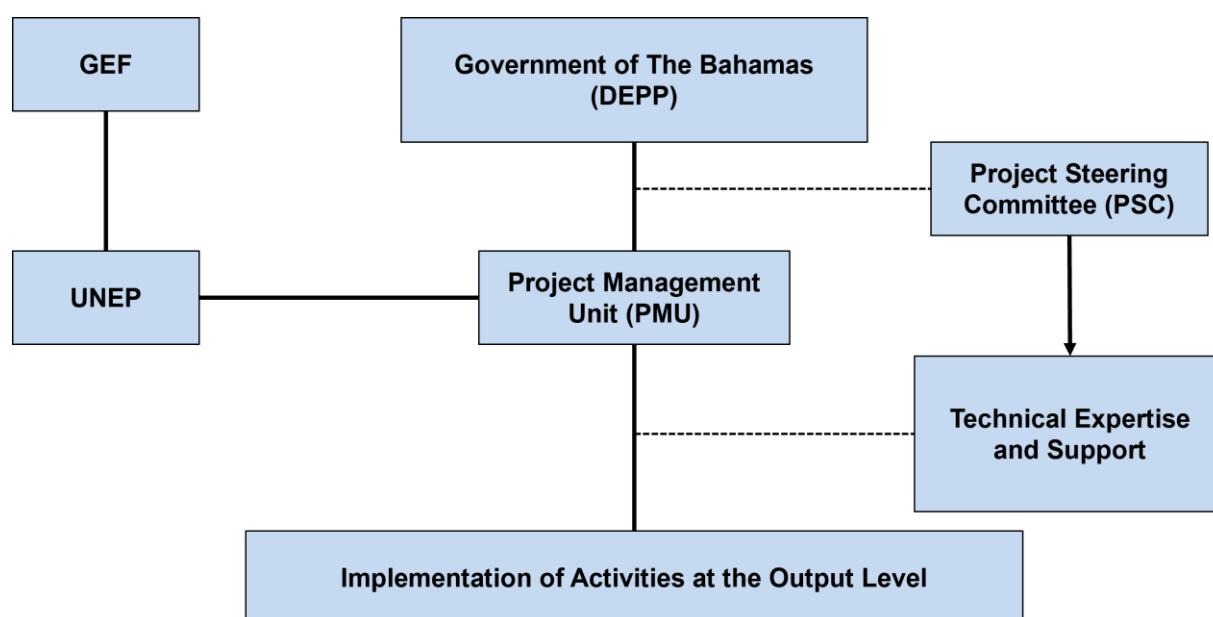
	Results Statement
Project objective	To create and apply the enabling conditions for fair and equitable access and benefit sharing to ensure that an effective ABS regime is in place.
Impact	To contribute to biodiversity conservation and the sustainable use of genetic resources through a functional ABS system aligned with the Nagoya Protocol.

	Results Statement
Intermediate state	1. A well-structured, organized, professional, and fair ABS regime, including mechanisms to facilitate access applications and protection of the country's genetic resources. 2. Sound ABS procedures and processes that generate monetary and non-monetary opportunities at the local and national levels, creating incentives for biodiversity conservation as a result of a better understanding of the effective implementation of the Nagoya Protocol. 3. Access and Benefit Sharing is operationalized through coordinated national implementation, informed stakeholders, and enforceable legal and institutional frameworks.
Component 1	National Strategy on ABS and accession to the Nagoya Protocol
Project outcome	Outcome 1.1. National Strategy and Accession to the Nagoya Protocol
Outputs	1.1.1. Access and Benefit Sharing Strategy for The Bahamas developed in a consultative process. 1.1.2. Awareness among decision and lawmakers on opportunities of the Nagoya Protocol is raised. 1.1.3. Legal documents needed for ratification/ accession are drafted.
Component 2	National enabling environment for the implementation of the Nagoya Protocol
Project outcomes	Outcome 2.1. Increased understanding of the national benefits to be accrued through ABS. Outcome 2.2. National ABS legal framework adopted. Outcome 2.3. Strengthened national institutional capacity for implementation of the national ABS framework.
Outputs	2.1.1. Consultations and public awareness campaigns with relevant stakeholders. 2.2.1. Policy, legal, and regulatory frameworks governing ABS drafted and submitted for approval. 2.3.1. Online administrative procedures for ABS agreements—including Prior Informed Consent (PIC), Mutually Agreed Terms (MAT), and Benefit-Sharing—are approved and operational. A monitoring system for research and bioprospecting permits, as well as ABS agreements, have been developed and implemented. 2.3.2. Capacity built within the competent authorities to initiate and negotiate contracts/agreements.
Component 3	Applied ABS arrangements in The Bahamas
Project outcomes	Outcome 3.1. ABS principles applied to adjusted commercial and non-commercial research permits.
Outputs	3.1.1. Pilot 1. Adjusted ABS contracts/agreements for research permits to include monetary and non-monetary benefit sharing provisions. 3.1.2. Pilot 2. Adjusted partnerships with ex situ collections take up ABS policies. 3.1.3. Pilot 3. ABS agreement integrates monitoring system for BD and sustainable use.

C. Project Implementation Structure and Partners

28. UNEP, through its Ecosystems Division via the GEF Biodiversity and Land Degradation Unit, served as the Implementing Agency (IA) for the project on behalf of the Global Environment Facility (GEF) Secretariat. UNEP was responsible for overall project supervision, ensuring that project implementation was consistent with GEF and UNEP policies, standards, and fiduciary requirements. Its functions included regular oversight to ensure the achievement of project objectives, acting as liaison between the project and the GEF Secretariat, and ensuring compliance with reporting obligations, monitoring and evaluation requirements, and fiduciary standards. UNEP also facilitated the timely disbursement of funds to the Executing Agency, approved budget revisions, certified fund availability, and organized the mid-term review, terminal review, and audits. Technical support and assessment of project execution were also provided by UNEP, alongside guidance on major terms of reference, memoranda of understanding, and contracts when requested. UNEP's Task Manager maintained continuous support and close collaboration with project personnel, ensuring compliance with GEF implementation requirements. Furthermore, UNEP was a member of the Project Steering Committee (PSC) and certified the project's operational completion.
29. The Department of Environmental Planning and Protection (DEPP), under the Ministry of Environment and Natural Resources of The Bahamas, was the Executing Agency (EA) of the project, acting on behalf of the Government of The Bahamas. DEPP was responsible for day-to-day project execution in line with the results framework, budget, and agreed work plan. Its responsibilities included providing technical expertise through its personnel and networks, supporting the Project Management Unit (PMU) in coordinating activities at national and local levels, and ensuring the technical quality of project outputs and deliverables. DEPP also facilitated stakeholder participation, access to sites, and logistical arrangements, such as meetings and the provision of facilities. It played a central role in monitoring progress, preparing progress and financial reports for submission to UNEP, and ensuring adherence to fiduciary requirements. In addition, DEPP chaired the Project Steering Committee, providing national leadership and coordination to ensure that the project's execution was consistent with national priorities and contributed to strengthening the country's Access and Benefit-Sharing (ABS) regime.
30. The Project Steering Committee (PSC) was the project's main coordination and oversight mechanism, and comprised representatives from, among others, the DEPP, the Office of the Attorney General, the Antiquities, Monuments and Museum Corporation (AMMC), the Department of Marine Resources (DMR), the University of The Bahamas (UB), the Customs Department, The Bahamas Agriculture and Marine Science Institute (BAMSI), the Foreign Affairs Ministry, The Bahamas National Trust (BNT), and the Forestry Unit.
31. The Project Manager (PM) was responsible for the execution, coordination, and supervision of all aspects of the project, and was in charge of the operative planning and day-to-day project activities, as well as management and consultancy follow-ups. The PM technically reported to UNEP and DEPP.
32. For a graphic overview of the project implementation structure and partners, see Figure 1.

Figure 1: Organigram of the project with key project stakeholders



D. Stakeholders

33. The ProDoc clearly identifies the key stakeholders involved in the project, including government institutions, non-governmental organizations, academia, the private sector, and international and intergovernmental organizations. However, in conversation with the Project Manager, an important observation emerged: although stakeholder consultations were conducted in 2016 during project design, and while implementation also started that year, the project only gained real momentum from mid-2019 onwards. As a result, in some cases there were institutions that were no longer involved during project implementation, and in other cases there were individuals, initially contacted within institutions, that were no longer involved when the project actually started.
34. Therefore, the Terminal Review consultant finds it appropriate to provide an updated list of key stakeholders who were directly involved in project implementation. The list below presents these stakeholders, organized by sector, identified as key change agents for advancing the ABS agenda.

Government Institutions:

- Department of Environmental Planning and Protection (DEPP)
- Department of Legal Affairs - Office of the Attorney General (OAG)
- Office of the Prime Minister
- Antiquities, Monuments and Museum Corporation (AMMC)
- Customs Department
- Ministry of Foreign Affairs
- Forestry Unit
- Department of Marine Resources (DMR)

International/Intergovernmental Organization

- United Nations Environment Programme (UNEP)

Academic / Research Institutions

- University of the Bahamas (UB)
- Bahamas Agriculture and Marine Science Institute (BAMSI)
- Perry Institute for Marine Science

Non-governmental organization

- Bahamas National Trust (BNT)

Private Sector/ External consultants

- Private Law Office
- International Legal Consultant -ABS
- International IT Consultant – ABS
- Technical IT – ABS

35. According to the Project Manager, organizations such as the Deutsche Gesellschaft für International Zusammenarbeit (GIZ) GmbH—one of the project’s co-financing agencies—contributed primarily through technical expertise, particularly in the development of the portal used to establish the permitting system. The International Union for the Conservation of Nature (IUCN) played a marginal role in project implementation; however, its relevance lies in its leadership at the regional level as Executing Agency in advancing the implementation of the Nagoya Protocol under the GEF-UNEP ‘Regional Project for Implementing National Biosafety Frameworks in the Caribbean Sub-Region’. The Caribbean Community (CARICOM), while not actively involved in implementation within The Bahamas, served as a regional partner through coordination in events such as the Caribbean Week of Agriculture, exchange of ABS good practices, and as a reference point for comparing The Bahamas’ experience in developing its ABS regime. Lastly, local communities, including fishers and divers, contributed to specific activities, particularly those conducted under Component 3 of the project.
36. It is worth mentioning that several stakeholders listed in the ProDoc did not participate in the project’s implementation. These include The Bahamas Agricultural Investment Corporation (BAIC) and the Department of Financial Services. Nevertheless, the Ministry of Finance is currently part of the ABS Committee established under the ABS Act. the University at Buffalo (USA), the University of Cape Town (South Africa), and the Gerace Research Centre (GRC)—which had early engagement with the project prior to its official launch—did not participate during the project’s implementation. Additionally, Marsh Harbour Exports & Importers (MHEI), a company involved in soft coral harvesting in The Bahamas, was identified as a relevant stakeholder but did not participate. Similarly, LIPO Chemicals was approached before 2019 but ultimately did not take part in the implementation. Likewise, despite being mentioned in the ProDoc, there was no interaction with the European Union during the project.
37. Although gender and minority group considerations were not well detailed in the ProDoc, several project outputs incorporated gender-sensitive approaches. The ABS Strategy for The Bahamas (Output 1.1.1) sought to be developed through a gender-sensitive consultative process, while administrative procedures for ABS agreements (Output 2.3.1) aimed to integrate gender-specific aspects into application and permitting processes. Capacity building for competent authorities (Output 2.3.2) also recognized

gender-differentiated biodiversity use and knowledge. The design team consulted key gender and ABS governance publications (e.g., IUCN, CBD), which informed strategy development and permitting systems. Nevertheless, the lack of women's groups or minority representatives as defined stakeholders in the ProDoc indicates that gender and social inclusion were not fully mainstreamed into the project's stakeholder engagement framework.

E. Changes in Design During Implementation

38. There were some major changes in project design during implementation. The project experienced considerable delays between 2016 and 2019, coming to a near standstill during this period. In 2019, however, changes in the Executing Agency's management brought a renewed commitment to implementation. With the re-launch of the project in June 2019 under dedicated project management leadership, implementation accelerated significantly.
39. Although the results framework remained unchanged throughout execution, the project did undergo adjustments in its financial planning. Budget allocations were revised across budget lines during the annual budget and workplan reviews, leading to a total of 14 approved budget revisions. Additionally, UNEP approved two no-cost extensions, formalized through Amendments 1 and 2 signed in October 2019 and July 2022 respectively. The first addressed delays from the initial start-up phase, while the second responded to challenges caused by the COVID-19 pandemic. It is important to note that during the pandemic, despite the challenges it posed, the project activities had to adapt to the new conditions, and that, in general terms, the activities made progress thanks to an effective project coordination and the positive attitude of key stakeholders.
40. It is worth highlighting that the ABS project in The Bahamas had a total co-financing target of \$2,042,292 but ultimately secured \$2,728,895.80 in co-financing support. As mentioned above, the project was extended over several years for various reasons, and the Government of The Bahamas continued to provide support well beyond the original completion date.
41. Lastly, the project underwent a Mid-Term Review (MTR), concluded in August 2021, which provided several recommendations. Among the most important were sharing lessons from the online permitting system with other countries, strengthening the ABS Committee to ensure sustainability, and developing an exit strategy with a cost-benefit analysis to guide long-term planning.

F. Project Financing

42. The total project cost was US\$4,525,941.25, comprising US\$1,797,045.25 from the GEF Trust Fund and co-financing contributions. While the originally committed co-financing amounted to US\$2,042,292, the project ultimately achieved US\$2,728,896 in co-financing, exceeding the initial commitment. The 59% obtained through co-financing was distributed as 37% in cash contributions and 23% in in-kind contributions⁹.

⁹ Information taken from the ABS final report. 7/24/2024

Table 4: GEF Expenditures

Year	Approved budget	Revised budget	Expenditure
2016	504,000.00	44,501.00	44,501.00
2017	789,000.00	14,634.26	14,634.26
2018	607,000.00	7,824.00	7,824.00
2019		163,133.29	163,133.29
2020		441,390.36	441,390.36
2021		448,503.07	448,503.07
2022		296,757.97	296,757.97
2023		379,511.77	379,511.77
2024		103,744.28	789.53
Total	1,900,000	1,900,000.00	1,797,045.25

Table 5: Co-financing table (GEF projects only)

Name of Co-financier	Actual Grant at TE (USD) <i>Inception to December 2023</i>	Actual In-kind at (USD) <i>Inception to December 2023</i>	Total Co-financing (USD)
Department of Environmental Planning and Protection (DEPP)	1,681,604.00	1,047,292.00	2,728,896.00
Totals	1,681,604.00	1,047,292.00	2,728,896.00

Co-financing (Type/Source)	UNEP own Financing (US\$1,000)		Government (US\$1,000)		Other* (US\$1,000)		Total (US\$1,000)		Total Disbursed (US\$1,000)
	Planned	Actual	Planned	Actual	Planned	Actual	Planned	Actual	
– Grants	1,900	1,797.04	1,000	1,681.60			2,900	3,478.64	3,478.64
– Loans									
– Credits									
– Equity investments									
– In-kind support	200	200	710	720	132.29	127.29	1,042.29	1,047.30	1,047.29
– Other (*)									
–									
Totals	2,100	1,997.04	1,710	2,401.60	132.29	127.29	3,942.29	4,525.15	4,525.93

* This refers to contributions mobilized for the project from other multilateral agencies, bilateral development cooperation agencies, NGOs, the private sector, and beneficiaries.

II. REVIEW METHODS

A. UNEP's Review Approach

43. In line with UNEP Evaluation Policy and the UNEP Programme and Project Management Manual, the review was undertaken at operational completion of the project to assess performance (in terms of relevance, effectiveness, and efficiency) and determine outcomes and impacts (actual and potential) stemming from the project, including their sustainability. The review has two primary purposes: (i) to provide evidence of results to meet accountability requirements, and (ii) to promote operational improvement, learning and knowledge sharing through results and lessons learned.
44. The main target audiences for the review findings are the UNEP Task Manager, the UN Environment Programme Evaluation Office, the Department of Environmental Planning and Protection, the Project Manager, the members of the Project Steering Committee, and other key project stakeholders.
45. In line with the UNEP Evaluation Policy and the UNEP Programme Manual, the review has been carried out using a set of 9 commonly applied review criteria which include: (1) Strategic Relevance, (2) Quality of Project Design, (3) Nature of External Context, (4) Effectiveness (incl. availability of outputs, achievement of outcomes, and likelihood of impact), (5) Financial Management, (6) Efficiency, (7) Monitoring and Reporting, (8) Sustainability, and (9) Factors Affecting Project Performance and Cross-Cutting Issues (see Annex II: Review Framework for more details on each review criterion).
46. Most review criteria are rated on a six-point scale as follows: Highly Satisfactory (HS); Satisfactory (S); Moderately Satisfactory (MS); Moderately Unsatisfactory (MU); Unsatisfactory (U); and Highly Unsatisfactory (HU). Sustainability and Likelihood of Impact are rated from Highly Likely (HL) down to Highly Unlikely (HU), and Nature of External Context is rated from Highly Favorable (HF) to Highly Unfavorable (HU). The ratings against each criterion are weighted to derive the Overall Project Performance Rating. The greatest weight is placed on the achievement of outcomes, followed by dimensions of sustainability.
47. The UNEP Evaluation Office has developed detailed descriptions of the main elements required to be demonstrated at each level (i.e., Highly Satisfactory to Highly Unsatisfactory) for each review criterion. The reviewer has considered all the evidence gathered during the review in relation to this matrix to generate review criteria performance ratings. In addition to the nine review criteria outlined above, the review addresses a number of strategic questions that were formulated in the Terms of Reference. These questions were posed by the UNEP Evaluation Office in conjunction with members of the Project Team.
48. For GEF-funded projects, review findings must be uploaded to the GEF Portal. To support this process, findings related to five GEF priority topics are summarized in Annex IX, as outlined in the GEF CEO Endorsement and Approval documents. These topics include: (i) performance against GEF Core Indicator targets; (ii) stakeholder engagement; (iii) gender-responsive measures and results; (iv) implementation of Safeguards Plan management measures; and (v) challenges and outcomes related to the project's Knowledge Management Approach.
49. This review adopted a participatory approach, engaging project team members, partners, and beneficiaries throughout the process. A core element of the review was the analysis and reconstruction of the project's Theory of Change. Consultations during

the inception phase supported a shared understanding of the intended pathways of change and the key assumptions and drivers underpinning them. The reconstructed Theory of Change, presented graphically and narratively, was further discussed and refined during data collection and is presented in its final form in this Review Report, having guided the review process throughout.

B. Data Collection

Primary data sources

50. Primary data for this Terminal Review (TR) was collected through a combination of semi-structured interviews, stakeholder consultations, and direct engagement during the country mission to The Bahamas, which took place from September 29 to October 2. Interviews throughout the TR were conducted with representatives of the Executing Agency (DEPP and the Project Manager), the Implementing Agency (UNEP and the Task Manager), and a range of project stakeholders (See Annex III and Table 6).
51. During the mission, interviews were carried out to capture perspectives from government officials, project beneficiaries, and other relevant stakeholders. These consultations provided valuable insights into project implementation, challenges encountered, and opportunities for strengthening outcomes. Data collected during this mission was complemented by virtual interviews held before and after the country visit. The interviews were based on questions drawn from the criteria that are listed in the TORs. The reviewer streamlined the interviews by clustering questions around the fundamental issues of interest. Throughout this review process, and in the compilation of the Final Review Report, efforts have been made to represent the views of all interviewees.
52. For reviews of ABS-related projects, field observations focus on discussions with individuals involved in establishing the ABS regime, regulations, and permitting system. Accordingly, the visit to The Bahamas was relevant for assessing project progress and performance. Discussions with local partners were essential for data collection. Although Tropical Storm Imelda delayed the consultant's arrival in Nassau and limited access to some institutions, requiring several interviews to be conducted online, the constructive engagement of interviewees helped mitigate these constraints, and both virtual and in-person interviews proved highly informative.
53. Close coordination with DEPP, the Project Manager, and UNEP facilitated access to key stakeholders, allowing the review to gather evidence not only on technical and administrative aspects of the project but also on broader issues of sustainability and ownership. This collaborative approach promoted transparency and ensured that stakeholders were informed and engaged throughout the process. The information gathered during the virtual meeting held prior to the reviewer's visit to The Bahamas—with the participation of 15 representatives from different organizations—together with the insights shared during the mission and the interviews conducted before and after the visit, served as the foundation for the conclusions and recommendations presented in this final report.
54. Following the document review and stakeholder interviews, the information was organized according to the Terminal Review criteria and questions. Findings from the desk review, in-country visit, and interviews with key national stakeholders, the Project Manager, and the UNEP Task Manager were then triangulated. Evidence supporting indicators was cross-checked against project reporting to validate results. Consistent

and complementary interview data were used directly to support findings, while discrepancies were addressed through corroboration with the Project Manager or further triangulation with additional sources.

Table 6: Review respondents and field visits

Stakeholders - Individuals			A. Total number involved (M/F)	B. Planned number to contact (M/F)	Sample size (% B/A) ¹⁰
Project Team	Project Team (with management responsibilities e.g., Project Management Unit)	Implementing agency	1/1	1/1	100
		Executing agency(ies)	2/4	1/4	83
Beneficiaries	Direct Beneficiaries: (e.g., duty bearers, gatekeepers, training participants, etc.)		12	12	100*
	Indirect Beneficiaries: (e.g., household members, civil society representatives, group members, etc.)		≈100	3/100	3**
Stakeholders - Entities			A. Total number involved	B. Planned number to contact	Sample size (% B/A) ¹¹
Partners	Project implementing/ executing partners (receiving project funds)		7/11	6/10	88
	Project collaborating/ contributing partners ¹² (not receiving project funds)		0/5	0/5	100
Possible Field Visits		Region / country / locality ¹³	A. Total number sites	B. Planned number sites to visit	Sample Size (%B/A) ¹⁴
		Latin America and the Caribbean	1	1	100

*To calculate the direct beneficiaries, the number of institutions interviewed was considered.

**To estimate the number of indirect beneficiaries, and in consultation with the Project Manager, it was decided to include the approximate number of users of the permit system. Although obtaining an exact figure was not a project objective, the DEPP Research Team provided an estimate, and three users were interviewed as a reference indicator.

Strategies for inclusivity

55. The reviewer, in close collaboration with the Project Manager, made every effort to reach out to all identified respondents in order to maximize response rates and ensure the inclusion of diverse perspectives. While several stakeholders were successfully consulted, some challenges arose: a number of individuals involved in the project no longer work in the institutions originally engaged; others have shifted to different areas of work and, regrettably, there was even a key contact at the University of The Bahamas who passed away. These circumstances illustrate that gathering information and

¹⁰ Percentage of people involved in the project that the review plans to contact.

¹¹ Percentage of entities involved in the project that the review plans to contact.

¹² Contributing partners may provide resources as either cash or in-kind inputs (e.g., staff time, office space, etc.).

¹³ In case of a global project, the unit of analysis is 'region'. In case of a regional or multi-country project, the unit of analysis is 'country'. In case of a single country project, the unit of analysis is 'locality', which could refer to a city, town, village, etc.

¹⁴ Percentage of total number project sites in each region, country or locality that the review plans to visit.

ensuring the participation of all stakeholders can be challenging, yet continuous efforts were made to capture as many viewpoints as possible.

Secondary data sources

56. The review made extensive use of secondary data sources to ensure a comprehensive understanding of the project's design, implementation, and achievements. The reviewer undertook a thorough review of the available documentation. The various types of documents provided information for different review criteria and questions. The consulted documents included, among others, the following: documents posted in the UN Environment Programme content management platform 'ANUBIS'—particularly the Project Document and its Annexes, Project Extension documents, Project Budget and revisions, Project Reports such as six-monthly progress and financial reports, annual Project Implementation Review (PIR) and Project Final Reports, and the report of the project's Mid-Term Review (MTR) (see Annex IV for a complete list). Additional documents were collected directly from partners and stakeholders during the field mission in The Bahamas, complementing the desk review with materials produced at the local level. Together, these resources provided the foundation for verifying reported results, assessing project consistency, and identifying gaps or issues that required further exploration.
57. The secondary data analysis followed the UNEP Evaluation Office's guidelines and incorporated the Review Framework, structured around nine benchmarked evaluation criteria. This systematic approach allowed for the triangulation of evidence from project documentation, monitoring data, and closure reports, ensuring that the findings were both robust and transparent. Importantly, the desk-based review was complemented by the subsequent country mission to The Bahamas, during which information was validated and cross-checked with stakeholders. This combination of documentary analysis and field verification strengthened the reliability of the evidence base and enhanced the overall quality of the review.

C. Data Analysis

58. The Terminal Review applied a mixed-methods approach to data analysis, ensuring both methodological rigor and sensitivity to the project's specific context. Thus, the methodology consisted of a combination of methods and tools to collect the qualitative and quantitative data necessary to answer the review questions in an objective, evidence-based manner. Qualitative techniques were central to the process, including systematic content analysis of interview transcripts and key documents to capture recurring themes, stakeholder perceptions, and the alignment of reported achievements with project objectives. Outcome mapping was further employed to trace behavioral and institutional changes among stakeholders, allowing the review to examine how the project contributed to shifts in practices and capacities beyond immediate outputs.
59. In addition, trend harvesting was used to identify unexpected results and emerging patterns, particularly through direct consultations with stakeholders during the country mission. Contribution analysis complemented these methods by examining the extent to which observed changes could be plausibly attributed to project interventions, while acknowledging the role of external drivers and contextual factors. The combination of these approaches not only reinforced the robustness of the findings but also provided a nuanced understanding of the project's effectiveness, relevance, and sustainability across different levels of impact.

D. Limitations and Mitigation Strategies

60. There were few limitations to the implementation of this TR. Although the IA and EA have been collaborative and transparent in terms of providing the reviewer with all required information in a timely manner and all stakeholders have been open to being interviewed, two (minor) limitations were identified. (i) The project was originally approved in 2016, and while some initial activities were undertaken thereafter, substantive implementation did not begin until 2019 due to a series of administrative constraints. Project activities ended in December 2023, and the terminal review was conducted from July to November 2025. Although the reviewer had access to the available information and was able to understand the extent to which the outcomes and outputs had been consolidated—which gave her an idea of the project's sustainability—there were also some challenges in terms of logistical organization and contacting the people who had participated in the project during this long period of time. Some institutions named in the ProDoc were no longer involved in the actual implementation of the project, and some individuals participated at the beginning of the project but then changed their place of work or were no longer active or ceased to participate towards the end of the project. (ii) In 2019, when project activities effectively began, the Director of the DEPP played an active role in promoting the initiative and advancing the implementation of the ABS regime in The Bahamas. In January 2022, a new Director assumed this position and oversaw the project's continued implementation and closure. Although both Directors demonstrated great commitment to the project, the reviewer found that communication between them was somewhat limited, making it difficult to fully analyze and reconcile the information provided. In this context, the support of the Project Manager was crucial to clarify how project activities were implemented, to identify the main achievements, and to understand which actions remained pending
61. During the visit to the Bahamas, Tropical Storm Imelda struck on the day of the scheduled trip, delaying the consultant's arrival in Nassau by one day and hindering some in-person interviews, as several areas were flooded and mobility was limited. Despite these unforeseen circumstances, the mission successfully overcame the challenges, and the consultant was able to collect valuable information for the preparation of the Terminal Review Report.
62. Finally, it is worth noting that, although the project extended beyond the initially planned timeframe and experienced personnel changes during implementation, key representatives from the EA and relevant national institutions remained engaged throughout. Their continued involvement helped maintain institutional memory and provided a comprehensive understanding of the project's achievements, results, and overall impact

E. Ethical Considerations

63. Throughout this review process and in the compilation of the Final Review Report, efforts have been made to represent the views of all interviewees. Data were collected with respect for ethics and human rights issues. All other information was gathered after receiving prior informed consent. All discussions remained anonymous, and all information was collected according to the UN 'Standards of Conduct'

III. THEORY OF CHANGE AT REVIEW

64. The execution of the present project is framed as described in the UNEP/GEF Project Document (ProDoc). The Results Framework is summarized in Table 6. The ProDoc does not include a theory of change (TOC), but it does provide a comprehensive set of outcomes and outputs that respond to the project's three main components, as well as a baseline for each indicator, together with targets and milestones for monitoring and means of verification.
65. No significant changes were made to the Results Framework (see Table 6). Only language refinements were introduced, including the rewording of one output whose original formulation did not accurately reflect the work carried out. This adjustment does not affect the project's final results; rather, it clarifies and strengthens the framework. The changes were discussed primarily with the Project Manager and subsequently reviewed with the UNEP Task Manager. As the project does not have a TOC, information on intermediate states was added. All these minor amendments were incorporated into the revised TOC, without altering the original project design. Consequently, the project's objectives and activities remain unchanged, but they are now articulated with greater clarity.
66. The project was organized around three main components. **Component 1** focused on developing a national ABS strategy and supporting The Bahamas' accession to the Nagoya Protocol, including outreach activities, analysis of the costs and benefits of accession, and the preparation of policy and legal instruments to give effect to accession. **Component 2** aimed to create an enabling environment for implementing the Nagoya Protocol by setting national priorities, conducting advocacy and awareness-raising activities, strengthening institutional coordination, and developing a national ABS legal and policy framework. A central element was the establishment of a single online permitting system to support streamlined access and compliance. **Component 3** sought to operationalize ABS arrangements through partnerships, training, regional cooperation, and alignment of *ex situ* collections with national policies. It also supported monitoring and sustainable use initiatives, including the establishment of a baseline and monitoring model for the sustainable collection of *Antillogorgia elisabethae*, the exploration of alternative harvesting strategies, and the review of ABS agreements with commercial partners.
67. The ProDoc did not include a Theory of Change (TOC) but presents a Results Framework in Appendix 4, which contains elements that were used for the reconstruction of the TOC developed during this TR (Figure 2). This Results Framework contains the three project components (strategies) with their respective outcomes and outputs, indicators, sources of verification, and assumptions. Through the objectives of each component—as well as the project's general objective—it is possible to infer the impact that this project aimed to achieve.

Table 7: Justification for reformulation of results statements

Formulation in original Project Document	Formulation for Reconstructed TOC at Review (RTOC)	Justification for reformulation
Project Objective		
To create and apply the enabling conditions for fair and equitable access and effective benefit sharing	To create and apply the enabling conditions for fair and equitable access and efficient benefit sharing to ensure an effective ABS regime is in place.	The wording was changed slightly, and the following was added at the end of the original objective: "to ensure an effective ABS regimen is in place," in order to make the objective easier to understand and address it comprehensively.

Formulation in original Project Document	Formulation for Reconstructed TOC at Review (RTOC)	Justification for reformulation
Long-term outcome		
Missing	The conservation of globally significant biodiversity mainstreamed into broader development strategies and action plans at the national level.	The Project Document did not include a long-term outcome, but this outcome was formulated in the Mid-Term Review and will be adopted for the Terminal Review as it reflects well what the long-term outcome of this project should be. The intermediate states presented below were also not included in the ProDoc. The first two were taken from the Mid-Term Review and have been edited for readability, and the third was introduced at this inception phase of the TR.
Intermediate states (changes beyond the project outcomes that are required to contribute to impacts)		
Missing	1. A well-structured, organized, professional, and fair ABS regime, including mechanisms to facilitate access applications and protection of the country's genetic resources. 2. Sound ABS procedures and processes that generate monetary and non-monetary opportunities at the local and national levels, creating incentives for biodiversity conservation as a result of a better understanding of the effective implementation of the Nagoya Protocol. 3. Access and Benefit Sharing is operationalized through coordinated national implementation, informed stakeholders, and enforceable legal and institutional frameworks.	
Component 1: National Strategy on ABS and accession to the Nagoya Protocol.		
OUTCOMES		
Outcome 1.1. National Strategy and Accession to the Nagoya Protocol support mainstreaming of ABS into environmental policy		
OUTPUTS		
1.1.1. Access and Benefit Sharing Strategy for The Bahamas developed in a consultative process 1.1.2. Awareness among decision and lawmakers on opportunities of the Nagoya Protocol is raised. 1.1.3. Legal documents needed for ratification/ accession are drafted		
Component 2: National enabling environment for the implementation of the Nagoya Protocol.		
OUTCOMES		
Outcome 2.1. Increased understanding of the national benefits to be accrued through ABS		
Outcome 2.2. National ABS legal framework adopted		
Outcome 2.3. Strengthened national institutional capacity for implementation of the national ABS framework		
OUTPUTS		
2.1.1. Consultations and public awareness campaigns with relevant stakeholders 2.2.1. Policy, legal, and regulatory frameworks governing ABS drafted and submitted for approval.	2.3.1. Online administrative procedures for ABS agreements—including Prior Informed Consent (PIC), Mutually Agreed Terms (MAT), and Benefit-Sharing—are approved	The wording was improved to make outputs 2.3.1. and 2.3.2. more comprehensible.

Formulation in original Project Document	Formulation for Reconstructed TOC at Review (RTOC)	Justification for reformulation
2.3.1. (On line) administrative procedures for ABS Agreements with Prior Informed Consent [PIC], Mutually Agreed Terms [MAT], and Benefit Sharing approved and available for use. Monitoring system for research and bioprospecting permits, ABS Agreements developed and implemented 2.3.2. Capacity built within competent authorities for initiating and negotiating contracts/agreements.	and operational. A monitoring system for research and bioprospecting permits, as well as ABS agreements, have been developed and implemented. 2.3.2. Capacity built within the competent authorities to initiate and negotiate contracts/agreements.	
Component 3: Applied ABS arrangements in The Bahamas		
OUTCOMES		
Outcome 3.1. ABS principles applied to adjusted commercial and non-commercial research permits	3.1. ABS principles applied to revise commercial and non-commercial research permits.	3.1. The outcome has been slightly edited for its better understanding.
OUTPUTS		
3.1.1. Pilot 1. Adjusted ABS contracts/agreements for research permits to include monetary and non monetary benefit sharing. 3.1.2. Pilot 2. Adjusted partnerships with ex-Situ collections take up ABS policies 3.1.3. Pilot 3. ABS agreement integrates monitoring system for BD and sustainable use.	3.1.1. Pilot 1. Adjusted ABS contracts/agreements for research permits to include monetary and non-monetary benefit sharing provisions.	In the ProDoc, the wording of this output is changed three times: first in the general description of the components, then in the Results Framework, and finally when describing the activities. The consultant believes that the wording in the table of activities is the one that best describes this output.

68. The project did not include explicit commitments related to human rights, people with disabilities or gender equality, nor were these aspects integrated into the Results framework. Consequently, the Terminal Review cannot provide an assessment on this topic. The project's focus is on the fair and equitable distribution of benefits derived from the use of genetic resources. While this inherently entails commitments to society, and the establishment of a regime on this matter represents progress toward considering all sectors of society, human rights, persons with disabilities and gender equality were not explicitly addressed in the project's design or implementation. For this reason, Table 7 is retained as a reference. An assumption has been added to the reconstructed TOC to be consistent with the United Nations Principles on the Protection or Promotion of Human Rights and Equality when there is no explicit commitment in the ProDoc regarding these matters.

Table 8: Justification for reformulation / expansion of drivers and assumptions

Formulation in original project document(s) – <i>insert source/date</i>	Formulation for reconstructed TOC at inception (RTOC)	Justification for reformulation
DRIVERS		
1. Human rights and gender equality ¹⁵		
Was not considered at project design (pre-dates UNEP Gender Policy)	The TR cannot include this topic or reformulate it when the project design and execution did not consistently consider these topics.	Does not apply
ASSUMPTIONS		
1. Human rights and gender equality ¹⁶		
Was not considered at project design (pre-dates UNEP Gender Policy)	Relevant government agencies and local partners will ensure equal access for women, persons with disabilities and marginalized groups to participate in project consultations and capacity-building activities.	It is clearly established that, for the TR, the United Nations principles on the protection or promotion of human rights and equality should be included in the TOC as an assumption if there is no explicit commitment made within the ProDoc regarding these topics.

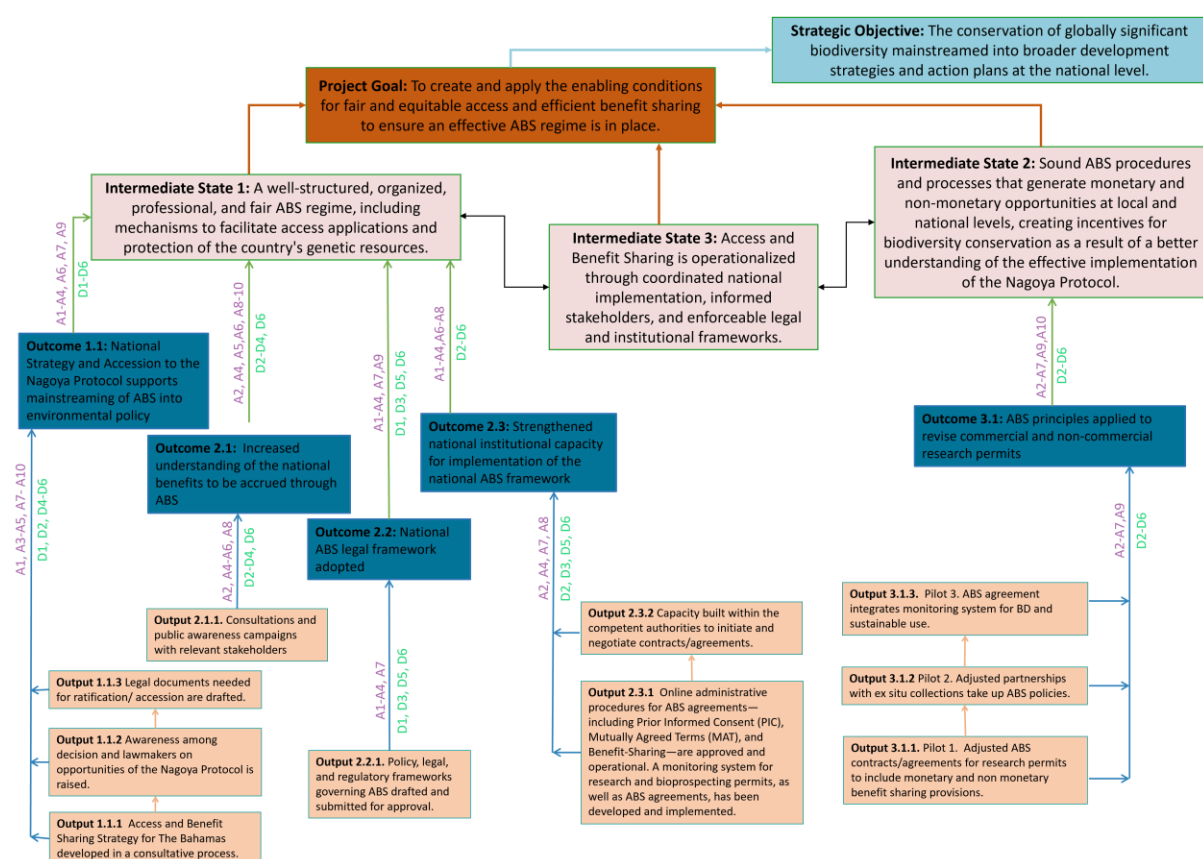
69. During the Mid-Term Review, a TOC was developed to illustrate the logical sequence linking project activities to results, intermediate states, and impact. For the Terminal Review Inception Report, core elements of this TOC were retained and refined to better clarify the contribution of project activities to intermediate outcomes and the project's overall objective.
70. The reconstructed ToC was structured around the three components defined in the ProDoc, reflecting the original causal pathways underpinning the project. This approach, initially applied in the Inception Report, was further strengthened in the Terminal Review based on improved understanding of the project's outputs, outcomes, and impacts.
71. The causal pathways of the project are:
- Causal Pathway 1. National Strategy on ABS and accession to the Nagoya Protocol
 - Causal Pathway 2. National Enabling Environment for the implementation of the Nagoya Protocol
 - Causal Pathway 3. Applied ABS arrangements in The Bahamas

¹⁵ If the project design document contains commitments on human rights and gender equality that are not reflected in the results framework, the commitment must appear as Driver.

¹⁶ If the project design document and the framework are silent on human rights and gender equality, the following assumption must be included in the TOC: 'The project works toward the UN principles on human rights and gender equality'.

72. Figure 2 presents the reconstructed TOC and shows how the three causal pathways established were used to outline the project's outcomes and outputs, as well as the drivers and assumptions that were instrumental during its implementation. During this exercise of reconstructing the TOC, the logic of the result pathways was reviewed, assumptions were refined, and the hierarchy from outputs to impact was completed. The assumptions contained in the Results Framework were reviewed and adjusted to represent the conditions necessary to achieve the results and the main objective of the project. A new assumption was introduced: "Relevant government agencies and local partners will ensure equal access for women, persons with disabilities and marginalized groups to participate in project consultations and capacity-building activities", to meet with the United Nations Principles on the Protection or Promotion of Human Rights and Equality since there was not an explicit commitment in the ProDoc regarding these matters. On the other hand, the drivers of the reconstructed TOC are proposed by the reviewer and are based on the project's overall context, as they were not described in the ProDoc. These drivers are underlying conditions that favor each pathway and could be leveraged by the project to promote change along the pathways.
73. It is relevant to acknowledge the three intermediate states proposed in the reconstructed TOC—two of which had already been identified in the Mid-Term Review—as they represent critical milestones in the project's logical pathway toward achieving its goal and strategic objective. The first state reflects the institutional foundations established through Components 1 and 2, including the development of a national ABS strategy, greater awareness among authorities, the establishment of a legal framework, and enhanced institutional capacity. Building on this, the second state translates the operational ABS framework into tangible results, with procedures and processes that generate both monetary and non-monetary benefits at local and national levels, providing incentives for biodiversity conservation; this outcome primarily derives from Component 3, which focused on pilot ABS agreements, benefit-sharing mechanisms, monitoring systems, and outreach activities. The third state serves as a bridge between the institutional setup and effective benefit realization, capturing the operationalization of ABS through coordinated national implementation, informed and engaged stakeholders, enforceable legal and institutional frameworks, and functioning administrative tools. Taken together, these states provide a coherent and realistic progression toward a fully functional ABS system that supports national priorities while fulfilling international obligations.
74. This exercise of the TOC reconstruction helped clarify the pathways to results, refined the assumptions, and improved the hierarchy from outputs to impact. The adjusted assumptions now better reflect the conditions necessary to achieve the results and the overall project objective, while the drivers proposed by the reviewer highlight the contextual factors that can support and leverage change along the pathways.

Figure 2: Theory of Change at review



Assumptions

- A1. The Government of The Bahamas remains committed to ratifying and implementing the Nagoya Protocol.
- A2. National technical capacity exists—or can be developed—to manage ABS systems and enforcement.
- A3. National laws can be aligned with international ABS requirements without major legal conflicts.
- A4. Institutions are willing to collaborate and coordinate through shared systems and processes.
- A5. Stakeholders, including local and indigenous communities, perceive clear and equitable ABS benefits.
- A6. The country's biodiversity continues to attract interest for research and bioprospecting.
- A7. Sufficient and sustained funding is available to support ABS implementation.
- A8. Stakeholders actively participate in awareness, training, and consultation activities.
- A9. Interest in ABS and Nagoya Protocol implementation is sustained beyond the project duration.
- A10. Relevant government agencies and local partners will ensure equal access for women, persons with disabilities and marginalized groups to participate in project consultations and capacity-building activities.

Drivers

- D1. Political and institutional will to adopt and implement the Nagoya Protocol
- D2. Active and sustained participation of key stakeholders
- D3. Strengthened technical and operational capacities within national institutions
- D4. Public awareness and understanding of the value of ABS and biodiversity
- D5. Sufficient financial resources allocated to the project
- D6. Collaboration with regional and international partners

IV. REVIEW FINDINGS

75. The findings presented in this section provide a summative analysis of all gathered and triangulated information relevant to the parameters of the review criteria. Review findings are objective and evidence-based and directly relate to the review questions under each criterion (see Annex II Review Framework).

A. Strategic Relevance

Alignment to UNEP's UNEP Medium Term Strategy¹⁷ (MTS), Programme of Work (POW) and Strategic Priorities

Table 9: Alignment to the UNEP Medium Term Strategy (MTS), Programme of Work (POW), and Strategic Priorities

UNEP strategic document	Alignment with UNEP's mandate and thematic priorities	Level of alignment <i>full, partial, or not at all</i>
MTS (2014 - 2017)¹⁸	The project aligns with UNEP's Strategic Focus on <i>Ecosystem Management</i> (Expected Accomplishment (a)) and <i>Environmental Governance</i> (Expected Accomplishment (b)), contributing to Aichi Targets 2, 16, and 17.	Full
POW (2014 - 2015)¹⁹	The project supports UNEP's goal to assist countries in strengthening environmental institutions and laws, implementing national environmental policies, and integrating environmental sustainability into national and regional planning.	Full
POW (2016 -2017)	The project contributes to Sub-programme 4, Expected Accomplishment (b), by enhancing national capacity to develop and enforce laws and strengthen institutions to meet international environmental objectives and obligations.	Full
Bali Strategic Plan for Technology Support and Capacity Building²⁰	Not explicitly mentioned in the ProDoc; however, the project indirectly supports the Plan's objectives through capacity building and institutional strengthening.	Partial
South-South Cooperation²¹	Not specifically referenced, but the project supports regional exchange of experiences on ABS implementation and policy development, consistent with the principles of South-South Cooperation.	Partial

¹⁷ UNEP's Medium-Term Strategy (MTS) is a document that guides UNEP's program planning over a four-year period. It identifies UNEP's thematic priorities, known as Sub-programmes (SP), and sets out the desired outcomes, known as Expected Accomplishments (EAs), of the Sub-programmes. <https://www.unenvironment.org/about-un-environment/evaluation-office/our-evaluation-approach/un-environment-documents>.

¹⁸ Refer to the MTS under which the project was approved.

¹⁹ Refer to the POW under which the project was approved.

²⁰ If applicable.

²¹ If applicable.

Alignment to Donor/GEF/Partners Strategic Priorities

Table 10: Alignment to Donor/GEF/Partner Strategic Priorities

Donor or partner strategic document	Alignment with donor or partner strategic priorities	Level of alignment <i>full, partial, or not at all</i>
GEF (GEF-5 Biodiversity Focal Area Strategy)	The project directly supports GEF Objective 4: "Build capacity on access to genetic resources and benefit-sharing," by assisting countries in establishing legal, policy, and institutional frameworks for ABS implementation in line with the Nagoya Protocol.	Full
UNEP	The project aligns with UNEP's mandate to promote environmental governance and strengthen national capacities for implementing multilateral environmental agreements, particularly the CBD and Nagoya Protocol.	Full
Government of The Bahamas	The project supports national priorities to develop and operationalize the Access and Benefit-Sharing framework and enhance biodiversity governance and institutional capacity.	Full

Relevance to Global, Regional, Sub-regional and National Priorities

Table 11: Relevance to Global, Regional, Sub-regional and National Environmental Priorities

Strategic document or agreement	Alignment with global, regional, sub-regional, national environmental priorities	Level of Alignment <i>Full, partial, or not at all</i>
Convention on Biological Diversity (CBD) and Nagoya Protocol	Fully aligned; the project directly supports implementation of the CBD objectives and the Nagoya Protocol by strengthening national legal, policy, and institutional frameworks for access and benefit-sharing (ABS).	Full
Aichi Biodiversity Targets (Targets 2, 16, and 17)	The project contributes to Target 16 (Nagoya Protocol operational), Target 17 (national biodiversity strategies), and Target 2 (integration of biodiversity into development planning).	Full
Caribbean Biodiversity Strategy / Regional frameworks	Not explicitly mentioned in the ProDoc; however, the project contributes to regional efforts to strengthen biodiversity governance and ABS capacity among Caribbean countries.	Partial
National Biodiversity Strategy and Action Plan (NBSAP) – The Bahamas	Supports national priorities for biodiversity conservation and sustainable use, particularly the development of ABS frameworks and institutional capacity.	Full

Complementarity with Existing Interventions/Coherence

Table 12: Complementarity with existing interventions/coherence

Other initiatives by UNEP or other organizations	Complementarity (including collaboration, coordination, and overlap or duplication)	Level of Alignment <i>Full, partial, or not at all</i>
UNEP-GEF Project: "Ratification and Implementation of the	The project complemented this regional initiative by focusing on national-level ABS implementation in The	Full

Other initiatives by UNEP or other organizations	Complementarity (including collaboration, coordination, and overlap or duplication)	Level of Alignment <i>Full, partial, or not at all</i>
Nagoya Protocol in the Caribbean Region”	Bahamas, contributing to the broader Caribbean effort to operationalize the Nagoya Protocol.	
GEF Regional Project: “Strengthening the Implementation of ABS Regimes in Latin America and the Caribbean”	Complementary in objectives and scope; the project benefited from regional knowledge exchange and capacity-building activities, ensuring coherence and avoiding duplication.	Full
National biodiversity and environmental management programs in The Bahamas	Coordinated with national authorities to integrate ABS into existing biodiversity and sustainable development frameworks, reinforcing institutional and policy coherence.	Full

76. The ABS Project in The Bahamas has made substantial contributions to UNEP’s strategic objectives, including the Medium-Term Strategy (MTS) and Programme of Work (POW), by strengthening national capacities in environmental governance and ecosystem management. By supporting the development of legal, policy, and institutional frameworks for Access and Benefit-Sharing (ABS), the project directly advanced the implementation of the CBD, the Nagoya Protocol, and the Aichi Biodiversity Targets 2, 16, and 17. The project also reinforced regional coherence through complementarity with ongoing UNEP-GEF initiatives in the Caribbean and Latin America, facilitating knowledge exchange and capacity building at both national and regional levels.
77. At the donor and national level, the project fully aligned with GEF’s biodiversity focal area priorities, particularly Objective 4 on building capacity for ABS, while supporting national priorities articulated in The Bahamas’ NBSAP and biodiversity governance programs. Through coordinated activities with regional initiatives, such as the GEF-funded projects on Nagoya Protocol ratification and strengthening ABS regimes in Latin America and the Caribbean, the project ensured coherence, avoided duplication, and maximized the impact of investments in institutional strengthening, legal frameworks, and policy development.

Finding 1: The project was aligned with UNEP’s strategic priorities, GEF objectives, and national frameworks in The Bahamas, directly contributing to strengthened biodiversity governance and the implementation of the Nagoya Protocol.

Finding 2: The project promoted knowledge exchange among Caribbean countries, complementing regional ABS initiatives and reinforcing national ABS frameworks.

Rating for Strategic Relevance: Satisfactory

Rating for Alignment to UNEP MTS, POW, and Strategic Priorities: “Satisfactory”

Rating for Alignment to Donor/GEF/Partner Strategic Priorities: “Satisfactory”

Rating for Relevance to Global, Regional, Sub-regional and National Priorities: “Moderately Satisfactory”

Rating for Complementarity with Existing Interventions/Coherence: “Satisfactory”

B. Quality of Project Design

Table 13: Summary of quality of project design assessment ratings

	SECTION	RATING (1-6)	Summary Assessment
A	Project Preparation	5	The ProDoc provides clear problems and situation analysis. While it adequately describes the main stakeholders, references to minority groups are brief, noting only that interventions aim to increase long-term socioeconomic benefits for marginalized populations. Gender equality is mentioned in the context of certain outputs, but no Theory of Change is presented in the text or annexes.
B	Risk Identification and Safeguards	5	Risks are appropriately addressed in the Risk Analysis and Results Framework, including potential instability in the operating context. Expected social and economic impacts are positive, with no negative environmental effects anticipated. Cost-saving strategies, such as minimizing travel, have been employed to reduce the project's carbon footprint.
C	Governance and Supervision Arrangements	6	The ProDoc does include comprehensive and clear project governance and supervision model and features. A comprehensive Project Steering Committee was established to oversee project implementation. The roles and responsibilities are clearly defined within the UNEP
D	Partnerships	5	The ProDoc lists the partners involved in the project, including key stakeholders and consultants, and notes which partners will co-finance the project. While some partner roles are clearly described, the responsibilities of others are not fully detailed.
E	Strategic Relevance	3	The ProDoc provides limited articulation of the project's strategic relevance. It references UNEP's MTS, POW, and strategic priorities, as well as GEF and donor priorities, and outlines national, subregional, and regional environmental priorities, particularly regarding the Nagoya Protocol and ABS. Links to the Bali Strategic Plan and South-South Cooperation are weak, and complementarity with other interventions, such as those by IUCN or GIZ, is only briefly mentioned.
F	Logical Framework and Causality	3	No Theory of Change was prepared, and causal pathways are not explicitly established but can be inferred from the logical framework. Drivers are not described. Key stakeholder roles are outlined, but marginal or vulnerable groups are not directly included. Results are generally realistic, with some depending on political will for legislative changes. Most outputs and outcomes are SMART, with defined indicators, targets, and baseline data.
G	Financial Planning	5	The ProDoc presents a budget appropriately linked to project results and components for each year, with no obvious deficiencies. It also includes co-financing expectations, both cash and in-kind, and describes partner commitments to this co-financing.
H	Efficiency	5	The ProDoc considers pre-existing agreements, partnerships, and complementarities with other initiatives, particularly in section A7. It references other GEF initiatives, including the regional ABS project and the GIZ ABS Capacity Development Initiative. Section B.3 highlights the project's cost-effectiveness through investment in national challenges and collaboration with ongoing and upcoming regional interventions.
I	Monitoring	5	The project monitoring plan allocates a budget for monitoring activities, including funds for mid-term and terminal reviews, and

	SECTION	RATING (1-6)	Summary Assessment
			establishes reporting and evaluation processes and procedures, with technical and financial project reporting requirements.
J	Sustainability / Replication and Catalytic Effects	2	The ProDoc does not include clear sustainability, replication, or exit strategies. Section C and Annex G mention disseminating lessons learned, and while strategies for scaling up or catalytic action are not explicitly described, the institutionalization of ABS processes across multiple government agencies suggests potential lasting effects beyond the project's duration.
K	Learning, Communication and Outreach	3	The project does not have a specific knowledge management approach, but Component 3 activities are well suited to achieving key knowledge management objectives. Communication strategies with stakeholders and partners are described, and dissemination of results and lessons learned is mentioned, though gender considerations and the needs of different social groups may not be fully addressed.
	<i>Total (Weighted) Score:</i>	4.11	<i>(Full analysis in the Inception Report, available from the Project/Task Manager)</i>

*A few adjustments to the Quality of Project Design section were introduced in the Terminal Report, based on a more complete understanding of the project than was available at the time of the Inception Report. Such refinements are expected and are a normal part of the review process.

78. The project design demonstrates several key strengths that contribute to its overall relevance. It is organized around three well-defined components, with outcomes and outputs clearly aligned with the project's objective. Governance and supervision arrangements are well-articulated—including the establishment of a Project Steering Committee—and partner roles and responsibilities are generally defined, particularly in relation to the ABS regime. Financial planning is sound, with a results-based budget broken down by year and by component, while monitoring, reporting, and evaluation procedures are clearly established for both technical and financial aspects. Risk identification and mitigation measures are addressed, and environmental, social, and economic safeguards are appropriately incorporated, ensuring positive anticipated impacts and no expected negative environmental effects.
79. The project exhibits satisfactory efficiency and some degree of strategic coherence through reference to existing agreements and partnerships, including regional ABS initiatives. While synergies with complementary interventions were not extensively developed, the ProDoc identifies capacity limitations in several partner institutions and outlines planned actions to address these within the three project components. Despite delays in implementation, renewed commitment from national authorities facilitated the continuation of planned activities without major alterations to the project design or budget, reflecting resilience and adaptability in the project's planning.
80. Nonetheless, the project design also presents some weaknesses. The absence of a formal Theory of Change limits the articulation of causal pathways, underlying drivers, and assumptions necessary to achieve the expected impacts. The project's logical framework provides some insight into how outputs (goods and services) are expected to lead to outcomes (changes in stakeholder behavior) and longer-term impacts, some results depend heavily on political will, particularly regarding legislative changes. Strategies for sustainability, replication, and catalytic effects are not sufficiently developed, and the knowledge management, learning, communication, and outreach components lack a dedicated framework. Stakeholder engagement is not fully detailed, with private sector participation underrepresented and no clear inclusion of gender, minority, or Indigenous perspectives beyond brief references in UNEP's safeguards screening form. The integrated approach to human and natural systems is weak, largely

limited to raising community awareness of genetic resources and ABS, further constraining the project's capacity to address social dimensions comprehensively.

Rating for Project Design: Moderately Satisfactory

C. Nature of the External Context

81. The project's implementation was significantly constrained by a series of external and institutional challenges that affected its performance and timely delivery of outputs. During the first years (2016–2018), weak administrative arrangements within the Project Management Unit (PMU), high staff turnover in key partner agencies, and changes in political directorates led to a near-suspension of activities. These internal governance challenges were compounded by a lack of continuity in project leadership and coordination, which delayed implementation until 2019. A three-year no-cost extension was granted to reinitiate activities, supported by renewed political commitment and the appointment of a dedicated management team under the Department of Environmental Planning and Protection (DEPP). This relaunch marked a turning point, yet it coincided with a series of highly unfavorable external events that further tested the project's resilience.
82. The first of these was Hurricane Dorian, which struck The Bahamas in September 2019, causing widespread devastation and redirecting government attention and resources toward national recovery and reconstruction efforts. The disaster delayed policy and legislative development under the ABS framework, as key institutions were fully engaged in post-disaster response. Despite this, the project demonstrated adaptability, with the Steering Committee and legal team resuming legislative drafting within few months. The subsequent COVID-19 pandemic imposed further constraints, including prolonged lockdowns and restrictions on physical meetings between 2020 and 2021. These conditions hindered field-based activities, such as the population modeling pilot by the Perry Institute of Marine Science and necessitated the adoption of virtual modalities for training and coordination. While these external shocks adversely affected implementation timelines and stakeholder engagement, the project responded effectively through cost-saving measures, virtual platforms, and enhanced coordination mechanisms—mitigating, though not fully eliminating, the impacts of these unfavorable external circumstances.

Rating for Nature of the external context: Moderately Unfavorable

D. Effectiveness

Availability of Outputs

Table 14: Availability of outputs

	Narrative Assessment	Sources of Information/Evidence
Output 1.1.1: Access and Benefit Sharing Strategy for The Bahamas developed in a consultative process. Performance against Indicator(s) and Target(s) The ABS Strategy was completed through stakeholder consultations led by DEPP, in line with the indicator and target set in the project's results framework. Other information, not related to the indicators, that demonstrates Output delivery: The process strengthened inter-institutional coordination and raised awareness among national stakeholders about ABS principles, contributing to the subsequent legislative drafting.	The ABS Strategy for the Bahamas was developed through a consultative process coordinated by the DEPP. Consultations were held with stakeholders, mainly government institutions, academia, and some representatives of the private sector, which contributed to national ownership and alignment with national priorities and the Nagoya Protocol. Despite some delays in implementation, the outcome was successfully delivered within the extended project timeline and provides a foundation for future ABS legislation and implementation. Level of delivery: fully delivered	– Final Project Report and PIRs (2020–2023) – Document Review – Records of meetings – Interviews with DEPP team, project manager, attorneys, researchers <i>Triangulation was achieved through cross-checking documentary evidence, meeting records, and stakeholder interviews to ensure consistency in reporting this output.</i>
Output 1.1.2. Awareness among decision and lawmakers on opportunities of the Nagoya Protocol is raised. Performance against Indicator(s) and Target(s) The indicator: “awareness on the Nagoya Protocol increased among key decision makers directly involved in the accession process” was partially achieved. The target was partially met. While formal briefings for all decision makers did not occur, the level of understanding and engagement achieved was sufficient to enable the country's accession to the Nagoya Protocol, demonstrating progress toward the intended outcome. Other information, not related to the indicators, that demonstrates Output delivery: The output contributed indirectly to the successful accession	Although the planned awareness activities for decision- and lawmakers were not fully implemented, an international legal expert delivered a power point presentation on the Nagoya Protocol and its national implications, which contributed to raising understanding among key government stakeholders. The awareness objective was ultimately achieved, as evidenced by the subsequent accession to the Nagoya Protocol. This suggests that, while implementation of the output's activities was partial, its intended outcome—increased awareness and engagement of decision-makers—was effectively realized.	– Final Project Report and PIRs (2020–2023) – Document Review (meeting minutes, presentation records) – Interviews with DEPP team, project manager and legal consultants <i>Triangulation was achieved through cross-checking documentary evidence, meeting records, and stakeholder interviews</i>

	Narrative Assessment	Sources of Information/Evidence
process, even though specific awareness-raising activities were fewer than planned.	<i>Level of delivery: partially delivered</i>	<i>to ensure consistency in reporting this output.</i>
Output 1.1.3. Legal documents needed for ratification/ accession are drafted. Performance against Indicator(s) and Target(s) Performance against Indicator: Accession documents were prepared. Performance against Target: All accession documents were submitted and contributed to the formal accession to the Nagoya Protocol in December 2021. Other information, not related to the indicators, that demonstrates Output delivery: The project ensured that all necessary legal and regulatory documents for accession were drafted, reviewed, and finalized, enabling The Bahamas to complete this process.	The project effectively supported The Bahamas in preparing the legal and regulatory documents necessary for accession to the Nagoya Protocol. Through stakeholder consultations and drafting workshops, the required documents were developed and reviewed, facilitating the country's formal accession in December 2021. This demonstrates the project's contribution to establishing the legal framework needed for implementing the Protocol. <i>Level of delivery: fully delivered</i>	– Drafted legal documents for Nagoya Protocol accession – Official ratification announcement or decree of The Bahamas (December 2021) – Final Project Report and PIRs (2020–2023)
Output 2.1.1. Consultations and public awareness campaigns with relevant stakeholders. Performance against Indicator(s) and Target(s) Performance against Indicator: Awareness-raising campaigns and consultation meetings targeting specific stakeholder groups were undertaken. Performance against Target: Consultations and public awareness campaigns were initiated, including a 2022 workshop on PIC and MAT. However, engagement was limited, and not all stakeholder groups were fully reached; the ET of reaching 80% of stakeholder groups was likely not fully achieved. Other information, not related to the indicators, that demonstrates Output delivery: While the project did not extensively focus on consultations and public awareness, the activities implemented—such as the PIC and MAT workshop—represent initial efforts to engage stakeholders and raise awareness, providing a foundation for future work in this area.	The project carried out some consultations and awareness activities, including a workshop in 2022 on Prior Informed Consent (PIC) and Mutually Agreed Terms (MAT). However, stakeholder feedback—including from researchers and workshop organizers—indicates that these activities were limited and that the project did not devote substantial effort to consultations and public awareness overall. While the formal targets were reported as met, the limited engagement suggests that further work would have been needed to achieve a more comprehensive impact in this area. <i>Level of delivery: partially delivered</i>	– Workshop report and agenda for the 2022 PIC and MAT workshop – Final Project Report and PIRs (2020–2023) – Stakeholder interviews and feedback (researchers and workshop organizers) <i>Triangulation was achieved through cross-checking project records and stakeholder feedback to validate the extent of engagement and awareness activities.</i>

	Narrative Assessment	Sources of Information/Evidence
Output 2.2.1. Policy, legal, and regulatory frameworks governing ABS drafted and submitted for approval. Performance against Indicator(s) and Target(s) The ABS Law was passed in March 2021 thanks to the work led by the DEPP, thus surpassing the indicator and target set in the project's results framework. Other information, not related to the indicators, that demonstrates Output delivery: The successful submission and eventual adoption of the ABS Act in March 2021 reflected the project's contribution to establishing a functional legal framework for ABS, beyond what is captured by formal indicators.	The project supported The Bahamas in drafting the policy, legal, and regulatory frameworks required for access and benefit-sharing (ABS). These documents were developed through targeted consultations and technical support and were formally submitted for approval. This work directly contributed to the adoption of the ABS Act in March 2021, demonstrating that the project successfully delivered this output and provided a foundation for implementing a national ABS regime. <i>Level of delivery: fully delivered</i>	– Drafts of the ABS Act – Official publication of the ABS Act (March 2021) – Project reports documenting the drafting process and internal reviews (PIRs)
Output 2.3.1. Online administrative procedures for ABS agreements—including Prior Informed Consent (PIC), Mutually Agreed Terms (MAT), and Benefit-Sharing—are approved and operational. A monitoring system for research and bioprospecting permits, as well as ABS agreements, have been developed and implemented. Performance against Indicator(s) and Target(s) Performance against Indicator: Online permitting system was established. Performance against Target: The system was commissioned and initially operational for national and international research applicants. However, due to technical issues, it is currently not fully operational. Other information, not related to the indicators, that demonstrates Output delivery: The project developed and implemented the online ABS permitting system. Despite operational challenges and stakeholder concerns, the system represents a key step toward streamlining ABS applications and monitoring compliance, providing a foundation for further improvements.	The project successfully commissioned the ABS online permitting system, establishing administrative procedures for prior informed consent (PIC), mutually agreed terms (MAT), benefit-sharing agreements, and research permits. The portal was operational during the final phase of the project and was used by national and international researchers to submit research applications. However, the implementation of the system raised significant concerns, mainly within the research community, including complaints about the fees to be paid and a temporary 18-month moratorium during which no permits were granted. While the output was formally achieved and the system initially functioned as intended, stakeholder feedback indicates that additional adjustments and stakeholder engagement were needed to address user concerns and improve overall acceptance of the system. Currently, the system is	– Project records documenting all actions taken to implement the permit system – Review of the system's functionality and the information on the forms that must be filled out – Interview with the international IT expert who developed the system – Interviews and comments from stakeholders reflecting their concerns about fees and the permit system itself

	Narrative Assessment	Sources of Information/Evidence
	experiencing operational problems that need to be resolved before permits can be fully processed online. Level of delivery: fully delivered	<i>Triangulation of information through review of project documentation, system usage data, and stakeholder comments to validate both operational status and stakeholder perceptions.</i>
Output 2.3.2. Capacity built within the competent authorities to initiate and negotiate contracts/agreements. Performance against Indicator(s) and Target(s) Performance against Indicator: Relevant government officials received basic orientation on MAT negotiations, which increased general awareness but did not amount to formal capacity building. Performance against Target: Gender-sensitive and tailored training materials were not developed, and the objective of fully training all targeted officials was not achieved. The target was therefore only partially met. Other information, not related to the indicators, that demonstrates Output delivery: An international expert provided an introductory session on ABS contract negotiation for members of the Steering Committee and researchers. The activity helped clarify key concepts and procedures but did not provide the practical training initially envisioned. As a result, while awareness was raised, institutional capacity to negotiate contracts remains limited.	A virtual workshop led by an international expert was organized to introduce key concepts and procedures related to the negotiation of ABS contracts and agreements. The activity provided valuable orientation for members of the Steering Committee and both national and international researchers. However, the workshop was primarily informational rather than a hands-on training and therefore did not fully achieve the intended objective of building practical negotiation capacity within the competent authorities. While the output contributed to raising awareness and understanding of ABS negotiations, the initial target of strengthening institutional capacity for contract negotiation was only partially met. Level of delivery: partially delivered	– Final Project Report and PIRs – Workshop documents – Information provided by the Project Manager related to the workshop <i>Triangulation of project documentation and comments provided by the Project Manager to validate the scope achieved within this output.</i>
Output 3.1.1. Pilot 1. Adjusted ABS contracts/agreements for research permits to include monetary and non-monetary benefit sharing provisions. Performance against Indicator(s) and Target(s) Performance against Indicator: Competent authorities tested and familiarized themselves with the ABS permitting system; however, no adjusted ABS contracts or finalized agreements incorporating monetary and non-monetary benefit-sharing provisions were produced.	Activities under this output focused primarily on testing the newly developed ABS online permitting system by the competent authorities involved in issuing research permits. While these actions contributed to familiarizing institutions with the permitting process, no specific pilot contracts or agreements incorporating monetary or non-	– Final Project Report and PIRs – Meeting minutes – Document review – Interviews with project manager and stakeholders

	Narrative Assessment	Sources of Information/Evidence
Performance against Target: Tailored training materials were not developed, and national depositories /databases were not established. The end targets were therefore not met. Other information, not related to the indicators, that demonstrates Output delivery: Project activities under this output concentrated on operational testing of the online permitting system by authorities responsible for issuing research permits. These tests helped identify procedural and technical issues and increased institutional familiarity with the permitting workflow, but they did not result in piloted or finalized benefit-sharing contracts or in the creation of national depositories. Further training and testing dedicated to contract negotiation and benefit-sharing agreements remained pending.	monetary benefit-sharing provisions were finalized. As a result, the output was only partially achieved, since practical implementation of benefit-sharing arrangements was not tested during the project period. Level of delivery: partially delivered	<i>Triangulation: The information was cross-validated by analyzing the available documents on this output and the interviews that were conducted.</i>
Output 3.1.2. Pilot 2. Adjusted partnerships with ex situ collections take up ABS policies Performance against Indicator(s) and Target(s) Indicator: Partnerships with ex-situ collections established. Target: Partnership /collaboration agreements established with 2–3 ex-situ collections. Performance: No formal partnerships or collaboration agreements were established during this reporting period. The activity conducted was limited to identifying and listing relevant ex situ collections in The Bahamas in collaboration with AMMC. This preparatory work lays the foundation for potential future partnerships. Other information, not related to the indicators, that demonstrates Output delivery: The project compiled a list of ex situ collections in collaboration with AMMC. This mapping provides a baseline for planning future outreach, capacity-building, and potential uptake of ABS policies in ex situ collections.	The project collaborated with The Antiquities, Monuments and Museum Corporation (AMMC) to compile a list of relevant ex situ collections in the Bahamas. No formal partnerships or in-depth studies were conducted; the activity consisted of identifying potential collections that could later engage with ABS policies. This preliminary mapping provides foundational information to support future ABS-related activities. Level of delivery: partially delivered	– Final Project Report and PIRs – Document review – Interviews with project manager and stakeholders <i>Triangulation: The information was cross-validated by analyzing the available documents on this output and the interviews that were conducted.</i>
Output 3.1.3. Pilot 3. ABS agreement integrates monitoring system for BD and sustainable use. Performance against Indicator(s) and Target(s) Indicator: Adjusted ABS agreement signed by the Government of the Bahamas and the commercial partner.	The Perry Institute for Marine Science (PIMS) completed and submitted a study on the population dynamics of the gorgonian sea whip <i>Antillogorgia elisabethae</i>. The work included the development and validation of a population model and a management plan to guide sustainable use and conservation of	– Final Project Report and PIRs – Model study deliverable – Study reports – Project reports related to the study

	Narrative Assessment	Sources of Information/Evidence
Target: Baseline established on sustainable harvesting; monitoring system operational with adjusted ABS agreement signed. Performance: Baseline established; the adjusted ABS agreement envisioned in the project design could not be implemented, as the commercial partner was no longer interested in this resource. Nevertheless, the study conducted remains valuable as a reference for future projects. Other information, not related to the indicators, that demonstrates Output delivery: The study conducted by PIMS provided a validated population model and a comprehensive management plan for <i>Antillogorgia elisabethae</i>. These deliverables form the scientific foundation for establishing sustainable harvesting practices and may support future implementation of a monitoring system integrated into ABS agreements.	this soft coral. These deliverables provide a scientific basis for integrating a monitoring system within ABS agreements, supporting evidence-based decision-making for biodiversity conservation and sustainable resource use in The Bahamas. Level of delivery: fully delivered	– Interviews with the researcher in charge of the study, project manager, and other stakeholders <i>Triangulation: The establishment of the baseline is verified through the PIMS report, interviews with stakeholders, and the consistency of information between different sources.</i>

83. The project effectively supported The Bahamas in advancing its national ABS framework, achieving key outputs despite some partial delivery in supporting activities. Accession to the Nagoya Protocol was fully achieved, underpinned by targeted stakeholder consultations, drafting workshops, and technical support to prepare the necessary legal and regulatory documents. These processes ensured alignment with national priorities and strengthened government ownership, providing a solid legal foundation for ABS implementation in the country.
84. The passage of the ABS Act in March 2021 was an achievement not only for The Bahamas but for the entire Caribbean region, reflecting the project's direct contribution to the establishment of national ABS legislation. Activities on Prior Informed Consent (PIC) and Mutually Agreed Terms (MAT) promoted understanding of, and commitment to, ABS principles. While the participation of some stakeholders and practical capacity-building efforts was limited in scope, these results successfully laid the groundwork for the national implementation of ABS policies and procedures.
85. To operationalize ABS processes, the project commissioned the ABS online permitting system, establishing procedures for PIC, MAT, benefit-sharing agreements, and research permit applications. The system became functional and was used by national and international researchers, although operational challenges and stakeholder concerns highlighted the need for additional adjustments. In parallel, preparatory work—such as the population model study of *Antillogorgia elisabethae*—provided a scientific baseline and evidence to support sustainable use and monitoring, demonstrating the project's contribution to enabling evidence-based decision-making and future uptake of ABS policies in The Bahamas.

Achievement of Project Outcomes

86. The achievement of project outcomes was assessed against those defined in the original project design and reflected in the reconstructed Theory of Change. These outcomes were intended to be accomplished within the project's implementation period and available resources. Their attainment is closely linked to the three main components established under the project framework.

Table 15: Achievement of project outcomes

Outcome 1.1.	National Strategy and Accession to the Nagoya Protocol support mainstreaming of ABS into environmental policy
Performance Indicator(s) and Target(s):	The project achieved all three indicators. A comprehensive ABS Strategy was developed through a consultative process. Awareness among key decision makers increased, and accession-related documents were completed and reviewed by national authorities. Targets were achieved: the ABS Strategy was prepared, and all documents required for accession to the Nagoya Protocol were finalized and approved, leading to accession by The Bahamas in 2021.
Sources of Information /Evidence:	– Final Project Report (2023) and PIRs (2019–2023) – ABS Strategy document and accession-related legal drafts – Meeting minutes, workshops – Interviews with DEPP directors, project manager, and legal consultant – Accession to the Nagoya Protocol (March 2021) Triangulation: Findings were confirmed through document review, interviews, and validation with project and government representatives.
Narrative Assessment:	The project successfully contributed to the establishment of a National ABS Strategy and to the accession of The Bahamas to the Nagoya Protocol, marking a significant milestone in the mainstreaming of ABS principles into national environmental policy. The development of the Strategy was conducted through a participatory process involving government agencies, legal experts, academia, and selected stakeholders, resulting in a policy framework aligned with national priorities on biodiversity and sustainable use of genetic resources. The accession to the Nagoya Protocol in 2021 represents a direct and tangible outcome of the project's interventions. The awareness-raising and legal drafting processes supported by the project were instrumental in generating the political momentum necessary for accession. This achievement reflects not only the project's catalytic influence in strengthening institutional capacity and legal preparedness, but also its role in fostering inter-institutional coordination and the involvement of decision-makers. The adoption of the national ABS framework and accession to the Protocol constitute key enabling steps toward institutionalization. The causal link between the project's interventions and the outcome is strong, as both the strategy formulation and the accession process were directly facilitated, funded, and coordinated through project activities
Level of Achievement:	Fully achieved

Outcome 2.1.	Increased understanding of the national benefits to be accrued through ABS
Performance Indicator(s) and Target(s):	Awareness of international and national ABS frameworks improved moderately, likely as a result of radio, television, and public service announcement campaigns. However, these efforts primarily reached government officials and other key stakeholders, with limited outreach to local communities and some civil society groups. It is unlikely that 80% awareness and understanding of ABS laws and the Nagoya Protocol was achieved among researchers, local communities, and relevant industry actors. However, awareness levels were notably higher among representatives of government institutions and some of the project's strategic partners. Thus, while clear progress was made among participants directly involved in project activities, broader societal awareness and understanding were not fully attained.
Sources of Information /Evidence:	– Final Project Report (2023) and PIRs (2019–2023) – Outreach materials – Document review – Interviews with DEPP directors, project manager, government officials and researchers Cross-analysis of the sources and consistency between them enabled a more robust and reliable assessment of the performance of this outcome.
Narrative Assessment:	The project contributed significantly to enhancing national understanding of the benefits derived from the Access and Benefit Sharing (ABS) framework. Public awareness campaigns were conducted in two main phases through radio, television, and public service announcements, focusing on the dissemination of information about the national ABS framework and related legal and administrative measures. These efforts aimed to clarify the rights and responsibilities of users and providers of genetic resources, including elements related to traditional knowledge. Quantitative evidence of behavioral change is limited, and qualitative feedback from stakeholder interviews reflects differing perspectives. Government institutions generally consider that these topics were effectively disseminated across various sectors of society, whereas representatives—mainly from the scientific community—indicated that the campaigns were insufficient and did not adequately reach local groups on the different islands of The Bahamas. Based on the review of project documentation and stakeholder interviews, it appears that the project was only partially successful in achieving its public awareness objectives and that this area may not have received sufficient attention.
Level of Achievement:	Partially achieved

Outcome 2.2.	National ABS legal framework adopted
Performance Indicator(s) and Target(s):	The indicators were that national law and implementing regulations on ABS are prepared for adoption, with the target being that national laws are finalized and ready to be submitted for approval and adoption by the relevant authorities. While the project successfully achieved and even surpassed this target, culminating in the adoption of the ABS Act in March 2021, the formal enactment of the law represents the ultimate confirmation of the outcome.
Sources of Information /Evidence:	– Final Project Report (2023) and PIRs (2019–2023) – ABS Act, March 2021 – Document review – Minutes from workshops and meetings during the legislative process. – Interviews with DEPP directors, project manager, government officials and legal consultants.

	Triangulation of these sources confirms the contribution of project activities to the adoption of the national ABS legal framework.
Narrative Assessment:	The outcome “National ABS legal framework adopted” is a major national achievement, formalized with the adoption of the ABS Act in March 2021. It provides comprehensive legal basis for access and benefit-sharing, covering all stakeholders including the government, researchers, private sector, and local communities. The project contributed directly through technical support in drafting the legislation, stakeholder consultations, and awareness-raising. These activities had a credible association with the adoption of the Act, demonstrating clear attribution of this outcome to the project.
Level of Achievement:	Fully achieved

Outcome 2.3.	Strengthened national institutional capacity for implementation of the national ABS framework
Performance Indicator(s) and Target(s):	Progress towards indicators was mixed. The National Competent Authority for ABS was designated, and is currently operational, reflecting substantial progress. The online system for ABS permit applications, administration, monitoring, and reporting was developed and launched, partially meeting expectations, though current technical challenges have limited their full functionality. Efforts to establish mechanisms for the protection of traditional knowledge were limited. The target related to the designation and operationalization of the National Competent Authority was achieved. Targets for the development and implementation of a one-stop online permit system were only partially met: while the system was created and initially deployed, it is not yet fully functional. Targets concerning traditional knowledge were not achieved, as no inventory or formal protection mechanism was implemented.
Sources of Information /Evidence:	– Final Project Report (2023) and PIRs (2019–2023) – Technical documentation and assessments of the permitting system – Document review related to the system – Interviews with DEPP research team, IT international expert, project manager, system users Information was triangulated through the review and cross-verification of official documents, project reports, and stakeholder interviews to ensure consistency and reliability of the findings.
Narrative Assessment:	The project made an important contribution to strengthening institutional capacity through the establishment of an online permitting system designed to manage ABS agreements, including Prior Informed Consent (PIC), Mutually Agreed Terms (MAT), and benefit-sharing arrangements. This represented a key step toward operationalizing the national ABS framework and improving the transparency and consistency of administrative procedures. However, the system’s implementation faced challenges, including user concerns related to processing times and the level of fees, as well as technical problems that have recently affected its full operation. Despite these limitations, there is a credible association between the project’s interventions and the observed institutional improvements. The creation and initial operation of the permitting platform demonstrated the project’s direct contribution to enhancing administrative capacity and provided a foundation for further strengthening the national ABS implementation framework.
Level of Achievement:	Fully achieved

Outcome 3.1.	ABS principles applied to adjusted commercial and non-commercial research permits
Performance Indicator(s) and Target(s):	The project partially achieved its indicators and targets. Preparatory tools and analyses were developed, including training for permitting authorities of the electronic system, a preliminary list of ex situ collections, and a population modelling study. However, formal ABS agreements incorporating benefits, partnerships with ex situ collections, and comprehensive national databases were not fully established. The third pilot demonstrated the most substantive application of ABS principles. While the project made important contributions to baseline knowledge, preparatory tools, and a concrete example of ABS application (third pilot), the performance against indicators and targets was partial, with limited implementation across all pilots.
Sources of Information /Evidence:	– Final Project Report (2023) and PIRs (2019–2023) – Document review – Reports, management plan and related documents for the population modelling study of <i>Antillogorgia elisabethae</i>. – Interviews with researchers and project manager Triangulation was achieved by cross-checking these sources.
Narrative Assessment:	The outcome encompassed three pilot initiatives aimed at applying ABS principles to research permits in The Bahamas. The first pilot focused on training users of the online permitting system; however, the training primarily targeted authorities managing permits rather than the originally intended researchers. A user manual was developed, but no workshops or additional training materials were delivered. The second pilot aimed to provide a comprehensive overview of ex situ collections in The Bahamas, assess whether these collections had ABS policies, and establish partnerships with collection holders. In practice, only a preliminary list of collections was compiled in collaboration with the Antiquities, Monuments, and Museum Corporation (AMMC), and no formal study or partnerships were established. As a result, the pilot contributed basic preparatory information but fell short of delivering the intended depth and scope. The third pilot successfully implemented a population modeling study for the gorgonian sea whip <i>Antillogorgia elisabethae</i>, conducted by the Perry Institute for Marine Science (PIMS). This study developed an individual-based model (IBM) to simulate the species' population dynamics and test the long-term impacts of harvesting on population structure. This pilot demonstrated a tangible application of ABS principles in research design and provided a scientific basis for sustainable use and monitoring, representing the most substantive outcome achievement among the three initiatives. The outcome-level changes are directly attributable to the project, as all three pilots were designed and implemented under its framework. The project facilitated training of the online permitting system, the preliminary compilation of ex situ collection data, and the population modeling study. However, the limited engagement with the broader research community in the first pilot, and the partial implementation of planned activities in the second pilot, indicate that while the project established important tools and processes, the full uptake and widespread application of ABS principles across commercial and non-commercial research remains incomplete.
Level of Achievement:	Partially achieved

87. The project achieved significant national milestones, most notably the accession to the Nagoya Protocol and the adoption of the national ABS legal framework (ABS Act) in March 2021. These achievements established a formal legal and policy foundation for access and benefit-sharing in The Bahamas, aligning national biodiversity and sustainable use priorities with international obligations. The project's technical support, legal drafting, and stakeholder consultations were directly instrumental for these outcomes, demonstrating a strong causal link between project interventions and results.
88. The establishment of an online permitting system was a key achievement, strengthening administrative capacity to manage ABS agreements, including Prior Informed Consent (PIC), Mutually Agreed Terms (MAT), and benefit-sharing arrangements. Although the system provides a solid foundation for operationalizing ABS principles, technical and procedural challenges mean that it is not yet fully operational. Nonetheless, it reflects the project's contribution to institutional readiness and transparency. At the same time, the system has raised concerns among users regarding procedures and associated fees—particularly for liability and research permits—which some researchers perceive as barriers to scientific activity. During the country visit, authorities underscored the importance of fees for ensuring benefit sharing, while researchers noted limited consultation and insufficient socialization during development, and expressed concerns that the system, in its current form, may constrain research and collaboration opportunities in The Bahamas.
89. Other project initiatives achieved partial results. Three pilots were implemented to test ABS principles in practice: training on the online permitting system, a preliminary compilation of ex situ collections, and a population modeling study for *Antillogorgia elisabethae*. Among these, only the third pilot delivered a substantive outcome by demonstrating a tangible application of ABS principles in research design and sustainable monitoring. The first and second pilots provided preparatory tools but did not reach the intended depth or establish formal partnerships, indicating that full uptake of ABS principles across research and commercial contexts remains incomplete.
90. Overall, the reviewer considers that the project succeeded in strengthening national capacities for Access and Benefit-Sharing (ABS) in The Bahamas. It fostered institutional dialogue and coordination, increased awareness of ABS principles, and contributed to consolidating the national ABS framework in line with the Nagoya Protocol. These efforts supported the fair and equitable sharing of benefits and, in turn, biodiversity conservation and sustainable use. At the same time, the institutionalization of the ABS framework remains ongoing, and further refinement will be needed to fully meet the needs of users and stakeholders.

Likelihood of Impact

91. This section will assess the likelihood that the outcomes achieved by the ABS Project in The Bahamas might contribute to the intended long-term impact of mainstreaming the conservation of globally significant biodiversity into national development strategies and action plans. The analysis reviews the extent to which drivers and assumptions along the impact pathway were in place, and the degree to which project outputs, outcomes, and intermediate states were achieved. It considers the political, institutional, technical, financial, and stakeholder engagement conditions necessary to sustain and scale the advances made, recognizing both the solid legal and policy foundation established during the project and the areas where further consolidation and capacity development are needed to realize the project's intended impact.

Table 16: Likelihood of impact

Factors influencing likelihood of impact	Assessment	Justification
Drivers to support transition from Outputs to the Project Outcomes	Partially in place	The political and institutional will to adopt and implement the Nagoya Protocol (D1) remained strong, as demonstrated by the accession to the Nagoya Protocol, the adoption of the ABS Act, and the development of the permitting system. However, the active and sustained participation of key stakeholders (D2) was partial, especially among researchers and other non-governmental parties. The technical and operational capacities of national institutions (D3) were strengthened, but they were not equal across different agencies. Public awareness of ABS and biodiversity (D4) increased thanks to communication efforts but did not reach all relevant sectors. Financial resources (D5) were sufficient for project implementation, but not sufficient for the system's long-term maintenance. Collaboration with regional and international partners (D6) was partially achieved.
Assumptions for the change process from Outputs to Project Outcomes	Partially hold	The Government of the Bahamas (A1) has maintained its commitment to the Nagoya Protocol, providing institutional continuity through the adoption of the ABS Act. However, the assumption that sufficient technical capacity (A2) existed or could be fully developed was only partially fulfilled, as limitations in the functioning of the system and inter-institutional coordination persist. Progress toward harmonizing national legislation with international ABS requirements (A3) has been gradual, and there are areas where further work is needed (PIC-MAT). Institutional collaboration (A4) improved, but there is a lack of continuity in relationships and communication. Stakeholder participation (A5, A8, A10) was mixed: some initiatives were undertaken, but active participation by researchers, local communities, and underrepresented groups remained limited. Sustained interest in ABS implementation beyond the project (A9) depends on continued funding (A7) and technical support, which are not yet guaranteed. The hypothesis regarding continued interest in national biodiversity research (A6) remains valid and offers possibilities for future ABS applications.
Proportion of Project Outcomes fully or partially achieved	Some	Core outcomes were achieved, including the accession to the Nagoya Protocol, the ABS framework that includes approval of the ABS Act, and the development of the online ABS permitting system. However, technical limitations constrained the system's full functionality, and the application of ABS principles throughout the three pilot initiatives was uneven. Only the population modeling study (Pilot 3) was fully implemented, while the pilots on training and ex-situ collections achieved partial progress. Efforts to develop mechanisms for traditional knowledge protection did not advance as initially planned. Overall, the project delivered several foundational achievements but fell short of achieving comprehensive ABS implementation.
Drivers to support transition from Project Outcomes to	Partially in place	The main drivers for the transition toward the intermediate states were partially in place. The accession to the Nagoya Protocol and the enactment of the ABS Act provided a strong legal and policy foundation for national implementation. The development of the online permitting system represented a key technical achievement toward operationalizing ABS procedures.

Factors influencing likelihood of impact	Assessment	Justification
Intermediate States		However, the transition remains incomplete. Institutional and stakeholder capacities to apply the new legal and technical instruments are still limited, and inter-agency coordination for the use of the electronic platform has not been fully established. Public awareness and participation in ABS processes have not been fully implemented, and achieving financial sustainability may affect system maintenance and broader outreach. Overall, while critical enabling drivers were established—particularly the legal and technical frameworks—their effective use and integration across institutions and stakeholders have not yet been entirely consolidated.
Assumptions for the change process from the Project Outcomes to Intermediate States	Partially hold	Some of the assumptions were held only partially. The Government of The Bahamas demonstrated continued political commitment through the accession to the Nagoya Protocol and the adoption of the ABS Act (A1, A3). However, technical capacity and inter-institutional coordination (A2, A4) have not been fully achieved, affecting the full operation of the online permitting system and enforcement of the legal framework. While the country's biodiversity continues to attract research interest (A6), stakeholder participation, especially among researchers and local communities (A5, A8, A10), has been uneven. Awareness of ABS provisions improved but has not yet translated into consistent engagement or understanding of equitable benefit-sharing. Sustained funding and long-term institutional interest (A7, A9) were not secured, which poses a risk to maintaining system functionality and training efforts. Overall, the enabling conditions exist in principle, but the assumptions related to capacity, coordination, funding, and stakeholder engagement have been partially met, limiting full progress toward the intermediate states.
Proportion of Intermediate States achieved	Some	Key elements of the ABS framework have been established, including the accession to the Nagoya Protocol, approval of the ABS Act, and development of the online permitting system. These achievements provide the foundation for a structured and operational regime. However, implementation remains partial, as the system is not yet fully functional, coordination among institutions needs to be strengthened, and benefit-sharing mechanisms have not been tested in practice. Progress toward all three intermediate states is therefore partial but provides a solid basis for future consolidation.
Drivers to support transition from Intermediate States to Impact	Partially in place	The legal and policy frameworks established through the accession to the Nagoya Protocol and the adoption of the ABS Act are key drivers for integrating biodiversity conservation into national development planning. Political commitment and institutional awareness remain strong; however, operational mechanisms to ensure compliance, monitor benefit-sharing, and coordinate action across sectors require further strengthening. The replication of ABS practices beyond the pilot initiatives will require both adequate financial resources and enhanced national capacity. Regional and international collaboration offers valuable opportunities for technical support but sustained national ownership and commitment will be essential to translating the existing frameworks into long-term biodiversity mainstreaming.

Factors influencing likelihood of impact	Assessment	Justification
Assumptions for the change process from Intermediate States to Impact	Partially hold	It was assumed that the legal, institutional, and technical progress achieved—particularly the accession to the Nagoya Protocol, the ABS Act, and the online permitting system—would contribute to integrating biodiversity conservation into national development strategies. These advances have strengthened the policy foundation and increased institutional awareness of ABS as a tool for sustainable use of genetic resources. The transition toward broader mainstreaming is still evolving. Continued political commitment, funding, and institutional collaboration are required to ensure that ABS effectively supports biodiversity conservation and its mainstreaming into national policies.

92. The project achieved several foundational outcomes that have positioned The Bahamas to be able to advance the implementation of Access and Benefit Sharing. The accession to the Nagoya Protocol, the approval of the ABS Act, and the development of the online permitting system represent major legal and technical milestones. These achievements established the necessary policy and institutional bases for a national ABS framework. However, the application of ABS principles in practice has been partial, as system functionality, coordination across institutions, and mechanisms for stakeholder participation and benefit-sharing are still evolving.
93. The drivers supporting the transition toward the Intermediate States were present but not yet fully consolidated. Political and institutional commitment to ABS remains strong, and national capacities have begun to develop around the permitting system and regulatory framework. Nonetheless, full operationalization requires further strengthening of inter-agency coordination, expanded engagement of research institutions and local stakeholders, and sustained financial and technical support. Public awareness efforts succeeded in increasing visibility of ABS, but continued outreach is needed to ensure meaningful participation and equitable understanding of benefit-sharing obligations and opportunities.
94. The assumptions underpinning the pathway to long-term impact hold partially. The progress made in establishing the legal and institutional foundation has created favorable conditions to integrate biodiversity conservation considerations into national development planning. The transition toward mainstreaming is ongoing, and its success will depend on continued political will, targeted capacity-building, and the ability to operationalize the ABS system in a way that effectively links access, benefit-sharing, and conservation incentives. With sustained commitment, the foundational outcomes achieved through the project can contribute to advancing the conservation of globally significant biodiversity in The Bahamas.

Finding 3: The project achieved its primary objective of establishing the national ABS framework, evidenced by the accession to the Nagoya Protocol, the adoption of the ABS Act, and the development of the online permitting system. These outcomes represent significant and directly attributable policy and institutional advances.

Finding 4: Institutional capacities for ABS administration were strengthened, particularly within the authority responsible for permit oversight. However, communication and coordination with key user groups—especially researchers and academic

institutions—were not sufficiently developed, affecting clarity, acceptance, and use of the permitting system.

Finding 5: The project increased national awareness of ABS principles and created the foundation for continued implementation. Sustained progress will depend on ongoing capacity-building, inter-agency coordination, and proactive engagement with research and local stakeholders to support effective and user-responsive operationalization of the ABS system.

Rating for Effectiveness: Satisfactory

Rating for Availability of Outputs: "Satisfactory"

Rating for Achievement of Project Outcomes: "Satisfactory"

Rating for Achievement of Likelihood of Impact): "Moderately Likely"

E. Financial Management

Adherence to UNEP's Financial Policies and Procedures

95. The financial management of the project adhered to UNEP's standard policies, rules, and procedures throughout the implementation period. The first disbursement of funds was made in May 2016, following UNEP's financial protocols and although substantive implementation activities effectively began in 2019, this timing difference did not negatively affect the project's financial execution, in part because no Project Manager costs were charged to the project during the period when implementation was effectively stalled. Project funds were administered in line with UNEP's requirements for authorization, procurement, reporting, and financial oversight. Regular monitoring by UNEP and the Executing Agency ensured that expenditures aligned with approved work plans and compliance obligations. No deviations from UNEP's financial policies were identified during the review.
96. The project was also subject to annual external audits, in line with UNEP's financial assurance requirements. These audits provided systematic oversight of expenditure patterns, documentation, and adherence to financial controls. Across all audit rounds, there were no findings of financial mismanagement, misuse of funds, or non-compliance. The consistent audit outcomes indicate effective fiduciary oversight and reinforce the conclusion that financial management practices met UNEP's accountability standards throughout the project's lifecycle.
97. In addition, the project's financial management arrangements were clearly defined under the Project Cooperation Agreement (PCA) signed between UNEP and the former BEST Commission (now DEPP) in May 2016. The PCA specified the procedures for financial administration, contracting, project management costs, record keeping, procurement, and reporting obligations. These provisions guided the financial execution of the project throughout its duration. Adherence to the PCA and UNEP's financial policies was reflected in the periodic expenditure reports (PER), budget revisions, audit reports, and financial documentation reviewed as part of this Terminal Review. The consistency and completeness of these records demonstrate that the project followed the required financial control framework and contractual obligations established at the outset.

Completeness of Financial Information

98. The financial information provided for the project was complete, consistently updated, and aligned with UNEP's reporting requirements. Throughout the project, financial statements and expenditure records were maintained in a clear and traceable manner, enabling verification of costs against planned budgets. A total of 14 budget revisions were processed during implementation. These revisions reflected minor adjustments to align expenditures with the pace of implementation and specific activity needs, rather than significant reallocation of funds across cost categories. While the review of specific PERs (e.g., period 31) showed that some allocated funds, for example, those for training activities, were not fully utilized, the project's final financial statement indicates that, overall, budget execution across categories remained sufficiently consistent with the approved allocations. All revisions were duly documented and approved through UNEP's formal procedures, demonstrating transparency and appropriate financial oversight.
99. The reported actual project costs are consistent with the total approved budget and with the figures confirmed in the annual audits. No discrepancies were found between reported expenditures, disbursed funds, and audited accounts. The completeness and accuracy of the project's financial information supported effective monitoring, decision-making, and closure processes, and provided confidence in the integrity of the financial management system applied.
100. It is important to highlight the co-financing performance of the project. While the ProDoc initially estimated approximately USD 2 million in co-financing, the project ultimately mobilized close to USD 2.7 million. These contributions came from several institutions, including DEPP, The Bahamas Government, Maillis and Maillis, Attorney Pericles A. Maillis acting as National Counsel, (*pro bono*), GIZ, and the University of The Bahamas (UB). This increase in co-financing represents a positive aspect of the project's financial management, as it demonstrates strong institutional engagement and resources leveraging beyond the original commitment. The documented contributions further support the completeness and reliability of the project's financial information.

Table 17: Financial management

Financial management components:	Rating	Evidence/ Comments
1. Adherence to UNEP's/GEF's policies and procedures:	S	The project consistently complied with UNEP's financial and administrative requirements. Disbursements and procurement were conducted according to standard procedures. Roles and responsibilities were clearly defined in the PCA, and audits confirmed full compliance with no irregularities. Although some activities experienced late start-up, this did not affect financial oversight. Overall adherence is rated as satisfactory.
Any evidence that indicates shortcomings in the project's adherence ²² to UNEP or donor policies, procedures, or rules?	No	No issues of non-compliance or irregularities were identified. Annual audits confirmed that financial and administrative procedures were followed.
Was first disbursement carried out within 9 months of UNEP's project approval date?	Yes	The first disbursement was made in May 2016, within the expected timeframe.
Were the procurement policies of UNEP and the donor(s) followed? (<i>where applicable</i>)	Yes	Procurement and contracting procedures were carried out in alignment with UNEP's requirements and were properly documented.

²² If the evaluation raises concerns over adherence with policies or standard procedures, a recommendation maybe given to cover the topic in an upcoming audit, or similar financial oversight exercise.

Financial management components:		Rating	Evidence/ Comments
2. Completeness of project financial information²³:			
Provision of key documents to the evaluator (based on the responses to A-H below)		S	The project's financial documentation was complete and traceable, allowing full verification of expenditures. Budget revisions were minor and properly approved, reflecting adaptive management. Co-financing exceeded initial commitments. The quality and completeness of financial records support a satisfactory rating.
A.	Co-financing and Project Cost's tables at design (by budget lines)	Yes	The ProDoc included detailed tables of co-financing and costs were broken down mainly by activities to be carried out within the three components of the project.
B.	Revisions to the budget	Yes	Fourteen budget revisions were processed, all formally documented.
C.	All relevant project legal agreements (e.g., SSFA, PCA, ICA)	Yes	The PCA signed between UNEP and the former BEST Commission (now DEPP) in May 2016 was available and clearly outlined financial and administrative obligations.
D.	Proof of fund transfers	Yes	Disbursement records were complete and traceable through financial reports and audit documentation.
E.	Proof of co-financing (cash and in-kind)	Yes	The project mobilized more than USD 2.7 million in co-financing from, among others, DEPP, The Bahamas Government, Maillis and Maillis, Attorney Pericles A. Maillis acting as National Counsel, (<i>pro bono</i>), GIZ, UNEP, and the University of The Bahamas, all documented. The co-financing reports are clear and complete, indicating the amounts in cash and in kind. A high percentage was co-financed in kind.
F.	A summary report on the project's expenditures during the life of the project (by budget lines, project components, and/or annual level)	Yes	Consolidated expenditure reports were provided with detailed breakdowns by budget line and implementation period, which enabled complete verification of financial execution. The PERs also specified the budget's components and the items included within each. For example, under the National Project Component, the reports outlined Project Personnel (National Project Coordinator, Project Staff, Administrative Staff), Consultants (national and international), and Travel (staff travel and transportation). In sum, the level of financial details was comprehensive and transparent.
G.	Copies of any completed audits and management responses (<i>where applicable</i>)	Yes	Annual external audit reports were provided and showed no findings of financial mismanagement. No corrective management actions were required
H.	Procure documents ²⁴ , including the approved requisition document and Source Selection Plan (<i>where applicable</i>)	N/A	No procurement under the project exceeded the USD 10,000 threshold requiring a Source Selection Plan. All procurements fell under standard low-value procedures and were carried out in compliance with UNEP guidelines; therefore, this requirement does not apply.
I.	Any other financial information that was required for this project (list):	N/A	No additional financial documentation was required beyond what was provided.
Overall rating		S	Considering adherence to UNEP procedures, the completeness of financial documentation, the positive audit record, and the successful mobilization of co-financing beyond the original commitment, the project's financial management is rated Satisfactory. Financial controls were sound and consistently applied, and no evidence of mismanagement or non-compliance was identified.

*All documents supporting financial management are available in Anubis.

²³ See also document 'Criterion Rating Description' for reference.

²⁴ Relevant for procurement action over USD 10,000 in value.

Finding 6: The project consistently complied with UNEP’s financial and administrative policies and procedures. Annual audits confirmed appropriate financial controls, and no cases of irregularity, mismanagement, or non-compliance were identified.

Finding 7: Financial information was complete, well-documented, and aligned with reporting requirements. Budget revisions were carried out properly, supporting adaptive financial management. Expenditures were traceable across implementation periods, and co-financing was effectively recorded, demonstrating sound financial oversight.

Rating for Financial Management: Satisfactory

Rating for Adherence to UNEP’s Financial Policies and Procedures: “Satisfactory”

Rating for Completeness of Financial Information: “Satisfactory”

F. Efficiency

101. The management of efficiency in the project evolved over time, as implementation needed to adjust first to administrative and governmental support constraints and later to external conditions beyond its control. Rather than advancing through a linear workplan, the project prioritized sequencing and timing of activities to maintain momentum when circumstances allowed. This approach enabled the project to progress within its available resources, even when timelines required reconsideration and implementation modalities needed to be adapted.
102. The project was approved in 2016 with an expected duration of 36 months; however, substantive implementation only began in 2019 once the necessary governmental support and institutional coordination were secured. During the initial period, administrative constraints and limited inter-agency alignment prevented progress in the planned project activities, leading to a first no-cost extension of three years in 2019. A second no-cost extension of 18 months was granted in 2022 to address implementation challenges associated with the COVID-19 pandemic. While these extensions significantly lengthened the implementation period, they did not require additional funding and allowed the project to maintain continuity and complete planned activities within the approved budget.

Type of project extension (cost/no-cost)	Duration (months)	Reason for no-cost extension
No-cost	36 months	To accommodate implementation delays since start-up.
No-cost	18 months	To accommodate implementation delays due to the COVID-19 Pandemic.

103. During the extended implementation period, the project adopted adaptive management and coordination approaches, including the use of virtual meetings and remote workshops, which enabled decision-making and technical progress despite pandemic-related mobility restrictions. This adaptive approach contributed to the achievement of key milestones, most notably the adoption of the ABS Act in March 2021. Although the overall pace of implementation was slower than originally planned, the project successfully delivered its core outcomes and established the foundational legal and institutional framework for a national ABS regime in The Bahamas. These achievements provide a structural basis upon which further capacity development and operational strengthening can continue beyond the project’s duration.

104. The project was built on pre-existing regional initiatives and institutional processes related to the implementation of the Nagoya Protocol. Notably, it benefited from tools, methodologies, and lessons learned generated under the UNEP-GEF regional project *Advancing the Nagoya Protocol in Countries of the Caribbean Region* (GEF ID 5774), which supported several Caribbean states in developing enabling ABS frameworks. The Bahamas' achievement in adopting the ABS Act now contributes back to this regional knowledge base, positioning the country as a reference for peers still in the process of drafting or formalizing ABS regulations. Complementarity was also reinforced through alignment with ongoing UNEP ABS initiatives, such as the project currently being implemented in Saint Lucia (GEF ID 10840). In addition, collaboration and information exchange with regional coordination bodies such as CARICOM (Caribbean Community) and the OECS (Organization of Eastern Caribbean States) have strengthened opportunities for replication and harmonization across the Caribbean. The presentation of project results at the Caribbean Week of Agriculture in 2023 further facilitated peer learning, visibility, and the potential uptake of The Bahamas' legislative and procedural experience by other countries in the region.
105. The nature of the project's activities inherently limited its carbon footprint. The project did not involve resource-intensive infrastructure or large-scale field operations, and most implementation efforts were carried out through national institutions within The Bahamas. Although international experts (in legal and IT matters) were required to travel to The Bahamas, international travel in general was relatively limited, and most activities were conducted locally. During the COVID-19 pandemic, meetings and workshops shifted to virtual formats out of necessity, which further reduced travel while allowing progress on key deliverables to continue. As a result, the project generated no significant environmental impacts related to its execution and maintained a low operational carbon footprint throughout its duration.
106. Overall, while the project required a significantly longer implementation period than originally planned, it advanced key outputs without additional financial resources and delivered the foundational elements of a national ABS regime. The adaptive management measures adopted, the alignment with regional ABS initiatives, and the efficient use of national institutional structures collectively supported progress within the available budget. The leadership and commitment of the DEPP were instrumental in achieving the implementation and achievements of the project. The project's efficiency is therefore considered moderately satisfactory, reflecting both the delays encountered and the successful delivery of core outcomes within the secured financial envelope.

Finding 8: The project experienced delays and required two no-cost extensions to complete planned activities. Despite the extended timeframe, core outputs—such as the ABS Act and the permitting system—were delivered within the approved budget.

Finding 9: The project collaborated effectively with national governmental institutions and other key stakeholders to generate expected outcomes. Given its extended implementation period, the project had to adapt to several administrative and contextual changes, including those caused by the COVID-19 pandemic. Project management demonstrated flexibility and was able to adjust to these evolving conditions, ensuring the continuity of implementation and delivery of planned outcomes.

Rating for Efficiency: Moderately Satisfactory

G. Monitoring and Reporting

Monitoring of Project Implementation

107. The monitoring system in place supported the regular tracking of activities, results, and progress toward project objectives throughout implementation. Monitoring relied on periodic progress reports, expenditure reviews, and coordination meetings between the Executing Agency and UNEP, enabling timely oversight of project performance. This system helped identify and respond to delays and contextual constraints—particularly those related to administrative transition periods and the COVID-19 pandemic—ensuring that the project-maintained direction and continuity toward its intended outcomes. Documentation generated during implementation was sufficiently complete, consistent, and appropriately archived to support management and review processes.
108. Monitoring information was used to inform adaptive management, particularly during the extended implementation period. As operating conditions changed, especially during the pandemic, monitoring feedback supported the decisions to shift key consultations and coordination mechanisms to virtual formats. This adaptive approach facilitated progress on critical deliverables, including the finalization and adoption of the ABS Act in 2021, despite limitations on in-person engagement.
109. However, while the monitoring system effectively tracked progress in establishing the legal and institutional framework, it did not extend to outcome-level indicators related to the practical application of ABS. Since no PIC/MAT agreements were finalized and no access requests or benefit-sharing arrangements were processed during implementation, the project did not generate operational cases that could be monitored to assess early uptake or the functioning of the ABS regime in practice. The pilots provided initial groundwork but did not reach a stage that allowed evaluation of tangible benefit-sharing results or engagement of resource users under the newly adopted framework.
110. The project did not systematically monitor the representation or participation of gendered or vulnerable groups through predefined indicators or baseline measures. While women's participation was notably high across project activities and within the Steering Committee—including several women in key institutional leadership roles—this appears to reflect pre-existing institutional staffing patterns rather than a targeted strategy or deliberate inclusion mechanism driven by the project itself. Participation trends were described qualitatively in project reports, but the absence of gender-disaggregated monitoring indicators limited the ability to assess whether inclusivity outcomes were actively promoted or sustained. This limitation reflects a design-stage constraint, as the project was formulated prior to UNEP's detailed articulation of its gender strategy in project formulation. Nonetheless, funds allocated for monitoring in the ProDoc were used efficiently to support reporting, coordination, and oversight, resulting in a monitoring system that was functional and operational for tracking implementation progress.

Project Reporting

111. Project reporting was carried out in line with UNEP requirements, through the submission of Project Implementation Reports (PIRs), Half-Year Progress Reports (HYPRs), Periodic Expenditure Reports (PERS), and final completion documentation. These reports provided regular updates on progress toward outputs, challenges encountered, and adjustments made during implementation. Information was generally presented clearly and consistently, allowing UNEP and the Executing Agency to monitor implementation and maintain oversight. Reporting processes benefited from the active

role of the Project Manager, who consolidated technical and administrative information from the different institutions engaged in the development of the ABS framework and ensured that reporting to UNEP remained timely and coherent.

112. Project reports highlighted representation of women within the core governmental institutions involved in the ABS process, with women holding key roles in the legal, research permitting, enforcement, and technical teams, as well as in the Steering and ABS Committees. This reflects an institutional environment in which women were already positioned in leadership roles relevant to ABS implementation, rather than the result of a targeted inclusion strategy within the project itself. However, interviews conducted during the Terminal Review indicate that engagement beyond government institutions—particularly with academic researchers, local communities, and traditional knowledge holders—was more limited. Several stakeholders, including members of the research community who contributed to technical discussions during legal drafting stages, reported that consultation processes were intermittent and did not consistently include them during key decision-making moments, particularly around the design and operationalization of the ABS permitting system. Likewise, no substantive engagement took place with community-level traditional knowledge holders, despite their potential relevance for future ABS benefit-sharing arrangements. This reflected a limitation in the project design and results framework, as no outcome-level indicators were defined to capture community-level engagement and emphasis was placed primarily on institutional decision-making structures. Although traditional knowledge holders were acknowledged as relevant stakeholders, the design remained vague in specifying how results for these groups would be generated or measured. As a result, while institutional participation was well documented, the project could not reflect the perspectives or contributions of broader stakeholder groups, since they were not actively involved in project activities. This may have implications for the system’s future uptake and legitimacy.

Finding 10: The project maintained regular monitoring through periodic progress reports and coordination meetings, which supported timely adjustments during implementation. However, assessment of the operational use of the ABS framework was constrained because the system became functional late in the project cycle, leaving limited implementation time for evaluation. This reflects a project design and sequencing limitation rather than a monitoring failure and had been previously identified in technical reporting.

Finding 11: Project reporting was timely and complete, and it documented the strong participation of women in institutional roles. However, this did not reflect a gender strategy within the project, and there was no substantive inclusion or reporting of community-level stakeholders.

Rating for Monitoring and Reporting: Moderately Satisfactory

Rating for Monitoring of Project Implementation: “Moderately Satisfactory”

Rating for Project Reporting: “Moderately Satisfactory”

H. Sustainability

Socio-political Sustainability

113. The project generated a high degree of socio-political support, reflected most notably in the accession to the Nagoya Protocol, the adoption of the ABS Act in 2021, and the establishment of the online permitting system. These achievements required sustained governmental commitment, legal coordination, and endorsement from different

agencies, indicating strong ownership of the national ABS agenda at the policy and institutional levels. The involvement of key ministries and technical agencies in the Steering Committee further reinforced institutional awareness of ABS processes supported by cross-ministry coordination and sustained leadership from DEPP. The establishment of the ABS Committee under the Act provides a formal mechanism to carry forward coordination and decision-making beyond the project period.

114. At the same time, the continuation and deepening of socio-political support will depend on expanding engagement beyond government institutions. While stakeholders in public administration and legal and technical bodies demonstrated commitment during implementation, engagement with academic researchers and local communities was more limited and did not fully translate into long-term partnerships. Several interviewees noted that, following the adoption of the ABS Act, communication and outreach efforts slowed, leaving some stakeholder groups uncertain about next steps for operationalization. Sustaining socio-political momentum will therefore require ongoing outreach, clear guidance for users of the system, and platforms for inclusive participation to ensure that ABS is understood and valued across sectors that are essential for its practical implementation.

Financial Sustainability

115. The legal and policy outcomes achieved by the project—most notably the accession to the Nagoya Protocol and adoption of the ABS Act—do not require additional financial inputs to remain in force. However, the full realization of benefits from these outcomes depends on continued operational support to maintain and improve the online permitting system, including stable IT support, periodic system updates, user assistance, and coordination across agencies. These functions require dedicated resources for staffing, technical troubleshooting, and ongoing training. Without sustained financial support for these operational needs, the functionality of the permitting system may weaken over time, limiting its usability and constraining the practical application of ABS procedures.
116. The Department of Environmental Planning and Protection (DEPP) currently maintains a Research Team responsible for managing the ABS permitting process; however, challenges related to the functionality and maintenance of the electronic permitting platform have emerged since the project closed. According to some users consulted during the Terminal Review, technical issues and slow processing times are causing delays in research approvals and, in some cases, affecting the continuity of scientific work. DEPP has acknowledged these difficulties and is actively seeking solutions, including exploring the possibility of migrating the permitting platform to an alternative software environment or technical architecture. While this demonstrates institutional commitment, any transition away from the original system developed under the project should be carefully managed to avoid losing functionality, institutional knowledge, or implementation progress already achieved. Despite these challenges, DEPP has expressed clear commitment to improving the permitting process and ensuring the long-term operational sustainability of ABS implementation in The Bahamas.

Institutional Sustainability

117. The project generated important institutional achievements that provide a legal and organizational basis for sustaining the ABS framework in The Bahamas. The adoption of the ABS Act and the formal establishment of the ABS Committee created defined governance roles and procedures for coordinating access applications and benefit-sharing oversight. However, interviews conducted during the Terminal Review indicate that regular coordination among ABS institutions has weakened since project closure,

with the ABS Committee reportedly not convening for over a year. As a result, while the legal and institutional structures remain in place, active engagement and communication among the agencies responsible for implementing the ABS regime will need to be reinforced to ensure that institutional memory is maintained and that responsibilities under the Act continue to be carried out effectively.

118. Going forward, strengthening institutional sustainability will depend on re-establishing routine inter-agency coordination and ensuring that operational responsibilities are clearly communicated and consistently applied across the relevant entities. Some academic and research institutions expressed uncertainty regarding the current permitting procedures and associated fees, noting that the time required to obtain, maintain, and renew permits can affect the planning and execution of research activities. They suggested that clearer communication channels and more explicit procedural guidance would help streamline the process and prevent delays that may inadvertently limit research progress. DEPP has demonstrated continued commitment to leading the ABS process; however, urgent and sustained support—both managerial and technical—will be required to consolidate institutional capacity and ensure effective implementation and oversight of the ABS regime over time and reinforce confidence among stakeholders and system users.

Finding 12: There is an important political ownership of the national ABS framework, demonstrated by the accession to the Nagoya Protocol, the adoption of the ABS Act, and the establishment of the permitting system. However, after project closure, coordination among government institutions has weakened and stakeholders reported reduced communication, which may affect continued momentum.

Finding 13: The permitting system and associated ABS functions require robust ongoing resourcing, including IT support and technical personnel, to operate effectively. While DEPP has expressed commitment to maintaining and strengthening the system, current challenges with platform functionality will limit the sustainable operationalization of ABS processes.

Finding 14: The project succeeded in establishing the legal and institutional framework required for ABS implementation, including defined roles for key agencies and procedures under the ABS Act. To ensure sustainability, these arrangements now require continued operational consolidation, particularly in standardizing procedures, strengthening inter-agency coordination mechanisms, and maintaining the bodies responsible for oversight under the ABS Act. Continued institutional engagement will be essential to translate the legal framework into a fully functioning operational system.

Rating for Likelihood of Sustainability: **Moderately Likely**

Rating for Socio-political Sustainability: "Moderately Likely".

Rating for Financial Sustainability: "Moderately Unlikely."

Rating for Institutional Sustainability: "Moderately Likely".

I. Factors Affecting Performance and Cross-Cutting Issues

Quality of Project Management and Supervision

119. Project management was generally effective in coordinating implementation and ensuring progress toward key outcomes, particularly after substantive activities began in 2019. The Project Manager played a central role in maintaining momentum during periods of administrative transition and external disruption, including coordinating

virtual work during the COVID-19 pandemic and facilitating the inter-institutional dialogue required to advance the ABS Act and permitting framework. UNEP supervision was consistent throughout implementation and provided guidance on technical and procedural matters when needed. Regular reporting and communication between UNEP and the national EA contributed to maintaining alignment with project objectives and ensuring compliance with UNEP's financial and administrative requirements.

120. However, project management also faced challenges that influenced the pace and continuity of implementation. The long implementation timeframe meant that institutional priorities and personnel changed over time, requiring periodic re-engagement and re-alignment among participating institutions. While coordination among key government actors was solid during the development of the ABS Act, several stakeholders, particularly research institutions, reported that their involvement was intermittent and not sustained throughout subsequent phases of implementation. Engagement with local communities was also limited, despite their importance to the subject matter and to the future viability of ABS arrangements. Overall, project management and supervision were adequate to achieve the core outcomes; however, the lack of sustained stakeholder participation and consistent operational monitoring remains a relevant consideration for the continued implementation of the ABS framework.

Stakeholders' Participation and Cooperation

121. Stakeholder participation during implementation was robust among national governmental institutions. The Steering Committee functioned as the primary coordination platform and included representatives from key ministries, many of whom played central roles in drafting and applying the ABS Act. The project also benefited from targeted contributions by external experts, including legal specialists and IT professionals contracted to support the development of regulatory instruments and the permitting system. This collaboration allowed the project to draw on specialized technical competencies that were not available internally, while policy ownership remained anchored within the Government of The Bahamas.
122. Engagement from academic and research stakeholders was present but varied over time, partly due to changes in personnel, institutional priorities, and the extended implementation period. While some researchers contributed substantially to the development of the legal framework and early discussions on access and traditional knowledge, several interviewees noted that consultation was not consistently sustained during later stages, particularly during the operationalization of the permitting system. Cooperation with non-governmental and community-level actors was more limited, with interaction occurring mainly through awareness sessions rather than continuous involvement. Overall, stakeholder cooperation was sufficient to enable the creation of the legal and institutional framework; however, ongoing and more structured engagement across sectors will be important to support the effective use and acceptance of the ABS system moving forward.

Responsiveness to Human Rights and Gender Equality

123. The project demonstrated a notable presence of women within key governmental and technical roles responsible for the development of the ABS framework. Women held leadership positions in the legal drafting team, research permitting unit, and the Steering Committee, as well as in the ABS Committee established under the ABS Act. Their involvement influenced decision-making processes and reflected an institutional context in which women occupy relevant public-sector functions. However, this representation appears to stem largely from pre-existing institutional staffing patterns

rather than from targeted gender mainstreaming strategies within the project design or implementation.

124. In contrast, engagement with local communities, resource users and traditional knowledge holders—many of whom are women—was more limited. Participation at the community level was not systematically integrated into implementation processes, and no specific mechanisms were established to document or incorporate traditional knowledge perspectives into the evolving ABS framework. As a result, while gender representation was evident at the institutional level, the project provided fewer structured opportunities for participation and inclusion at the community level, where ABS benefit-sharing considerations are likely to hold greater relevance as the system moves toward practical application. This reflected a design-stage limitation, as the project was formulated prior to the detailed articulation of UNEP’s gender policy framework.

Environmental and Social Safeguards

125. At project design, relevant environmental and social safeguard (ESS) considerations were identified, particularly those related to the use of genetic resources (SS1.7), traditional knowledge associated with those resources (SS5.3), and equitable participation and working conditions (SS8.1). Mitigation measures were integrated into the project approach, including adherence to national and international ABS frameworks, legal clarity regarding access and benefit-sharing provisions, and an emphasis on participatory consultation processes intended to promote transparency and gender inclusion. While these measures supported a low-risk project profile, the inception review noted limited representation of local actors, which presented an early gap in ensuring broad-based participation.
126. During implementation, ESS issues were monitored in a manner proportionate to the project’s low environmental and social risk. Records of stakeholder consultations, attendance lists, and workshop documentation demonstrate efforts to include government agencies, research institutions, and other national stakeholders, with visible participation of women across several technical and decision-making roles. No safeguard-related adverse impacts were triggered, and no corrective actions were required. However, engagement with local community representatives and traditional knowledge holders remained limited, meaning that social inclusion dimensions were only partially realized in practice. Although some awareness efforts were carried out, there is room for further strengthening community-level participation in future ABS operationalization.

Country Ownership and Driven-ness

127. The project demonstrated a high level of national ownership, particularly through the leadership of government institutions responsible for environmental policy and natural resource management. The Government of The Bahamas played a decisive role in advancing the ABS agenda, including the accession to the Nagoya Protocol, the drafting and approval of the ABS Act (2021), and the establishment of the ABS permitting system. These actions reflect clear political backing for the development of a national ABS regime and show that the project responded to national priorities related to biodiversity governance, legal clarity to access genetic resources, and alignment with international commitments.
128. At the same time, the level of ownership across stakeholder groups varied over the life of the project. While government agencies maintained a consistent commitment, the participation of research institutions, academic actors, and other stakeholders fluctuated, influenced by non-effective communication and new administrative

challenges that arose after the project ended. Interviews indicate that, although the DEPP remains committed to implementing the ABS system, sustained inter-institutional coordination and clearer communication mechanisms will be needed to reinforce shared ownership and ensure that momentum continues beyond the formal project implementation period.

Communication and Public Awareness

129. The project implemented communication and awareness activities aimed at increasing understanding of ABS concepts and the newly established national framework. Public outreach included radio and television campaigns, informational materials, and stakeholder workshops focused on explaining the ABS Act, research permitting processes, and the role of government's institutions in overseeing access to genetic resources. These efforts contributed to raising institutional awareness and ensuring that relevant public-sector actors understood their mandates under the ABS system. The visibility of the project also increased through participation in regional events such as the Caribbean Week of Agriculture (2023), where The Bahamas shared its experience with its peers in the Caribbean.
130. However, communication efforts did not reach all stakeholder groups with the same depth or continuity. Interviews conducted during the Terminal Review and findings from the end-line KAP survey indicate that awareness of the ABS permitting system and its implications remains uneven among academic researchers, local resource users, and community actors. While government institutions involved in ABS demonstrated a high level of familiarity with the framework, outreach to stakeholders beyond the public sector was more limited and not maintained consistently over time. In addition, the KAP survey findings show that understanding of the ABS Act and permitting procedures remains uneven and that, although the permitting system is in place, its full potential has not yet been realized due to ongoing technical issues with the platform and limited communication of system procedures to users. As a result, understanding of procedural requirements and benefit-sharing mechanisms has not yet been broadly internalized by groups that are essential for the long-term operationalization of the ABS system. Strengthening targeted communication and engagement strategies will therefore be necessary moving forward, including the development of accessible guidance materials and more continuous outreach, to ensure that the ABS regime is both functional and widely understood.

Finding 15: Project management successfully coordinated inputs across institutions and maintained momentum despite administrative challenges and the COVID-19 pandemic. The shift to virtual coordination and sustained communication among key stakeholders enabled the delivery of main outputs.

Finding 16: Government institutions—supported through the Steering Committee—technical experts, and working teams, maintained consistent engagement throughout implementation. In contrast, participation from academic researchers and community stakeholders was more limited and irregular, which reduced opportunities for broader dialogue, knowledge sharing, and more substantive involvement in project activities.

Finding 17: Women held leadership roles across the institutional teams engaged in ABS development, strengthening representation in decision-making spaces. However, this balance reflected existing institutional structures rather than a targeted project strategy, and engagement with marginalized or community groups was not systematically integrated.

Finding 18: The project had a low environmental and social risk profile, and no adverse impacts were identified during implementation. Monitoring was proportionate to the nature of project activities, and there were no safeguard-related issues triggered over the course of the project. Overall, environmental and social safeguards were adequately managed.

Rating for Factors Affecting Performance and Cross-Cutting Issues: Moderately Satisfactory

Rating for Quality of Project Management and Supervision: "Satisfactory."

Rating for Stakeholders Participation and Cooperation: "Moderately Satisfactory".

Rating for Responsiveness to Human Rights and Gender Equality: "Moderately Unsatisfactory."

Rating for Environmental and Social Safeguards: "Moderately Satisfactory".

Rating for Country Ownership and Driven-ness: "Satisfactory".

Rating for Communication and Public Awareness: "Moderately Unsatisfactory".

V. CONCLUSIONS AND RECOMMENDATIONS

A. Conclusions

131. Overall, the project performed at a Moderately Satisfactory level. The project achieved significant progress in establishing the foundational legal and institutional framework for Access and Benefit-Sharing (ABS) in The Bahamas, culminating in the adoption of the ABS Act (2021) and the establishment of the national permitting system. These achievements represent major policy and governance milestones for the country.
132. The main achievements of the project were the legal adoption of the ABS framework and the establishment of the institutional arrangements necessary for its implementation. These outcomes enable The Bahamas to operationalize its commitments under the Nagoya Protocol and position the country as a regional reference among Caribbean states advancing ABS governance.
133. These accomplishments were facilitated by strong governmental ownership during key decision points, particularly the commitment of the Department of Environmental Planning and Protection (DEPP) and the Office of the Attorney General. Leadership continuity in these institutions played a decisive role in advancing legislative drafting, legal review processes, and inter-agency alignment required for the approval of the ABS Act.
134. The project demonstrated adaptive management during periods of disruption—including the COVID-19 pandemic—and of administrative and coordination challenges. Virtual modalities, targeted consultations, and staged technical discussions allowed progress to continue despite delays. This adaptability contributed to the continuity and finalization of core deliverables without requiring additional funds.
135. While gender equality was not an explicit focus of implementation, the project benefited from a high level of participation of women in decision-making roles within the legal, technical, and coordination teams. This contributed positively to institutional leadership representation; however, this participation appears to have resulted more from existing institutional structures than from a targeted gender strategy implemented by the project.
136. Conversely, engagement with local communities was more limited. Project activities did not consistently reach local actors or ensure their sustained involvement, which may affect how benefit-sharing considerations are understood and applied in practice going forward.
137. Similarly, the research sector expressed concerns regarding the implementation of the permitting system. Interviews and triangulation of information showed that, while researchers fully support the ABS regime and recognize its national importance, they are generally not comfortable with how the system currently operates. They emphasized the need to review procedures—particularly those related to the collection of fees for research involving access to genetic resources—to avoid creating disincentives for scientific work and collaboration.
138. The permitting system and associated procedures are a central element of the project's legacy; however, challenges in its current functionality—including delays, limited communication across stakeholders, and technical issues with the electronic platform—now pose risks to the effective use and perceived accessibility of the system. Addressing these constraints urgently is essential to support future application of the ABS regime.

139. Financial sustainability will depend on the Government's continued support to maintain and strengthen the operational aspects of the ABS permitting system, particularly in relation to the technical capacity required to manage and troubleshoot the electronic platform. While the legal framework is now in place, the effective processing of research applications and benefit-sharing arrangements requires ongoing institutional attention to ensure that the system remains functional, responsive, and accessible for users. Ensuring sustained technical support and adequate resourcing for the permitting system will be key to consolidating the gains achieved by the project.
140. Institutional sustainability is reinforced by the legal establishment of the ABS Committee and the incorporation of ABS responsibilities within existing government structures; however, coordination mechanisms require reactivation and clearer communication channels. Ensuring regular committee meetings and structured inter-agency follow-up will be important to maintain momentum and institutional memory.
141. The project contributes to regional ABS implementation by providing a model for legal adoption and administrative structuring that can inform other Caribbean states. Continued participation in regional knowledge exchange platforms—such as those coordinated by CARICOM and UNEP—will be important to sustain visibility, peer learning, and further technical refinement of the ABS regime in The Bahamas.

Responses to Key Strategic Questions

142. The review Terms of Reference included a set of strategic questions of interest to UNEP. Regarding Strategic Question One, the level of awareness of the ABS national framework among core regulatory entities is generally strong, particularly among those institutions that participated directly in the drafting and approval of the ABS Act. These actors retain a clear understanding of the legal basis and institutional responsibilities associated with ABS. However, awareness among broader stakeholder groups—such as academic researchers, private sector users, and community-level knowledge holders—has remained uneven. While communication efforts carried out during the project helped introduce the framework, outreach did not fully translate into sustained engagement or a shared understanding of how benefits may accrue in practice. Continued efforts will be needed to reinforce awareness, foster dialogue, and ensure inclusive participation in the ongoing development and application of the ABS framework.
143. Regarding Strategic Question Two, the review finds that although the ABS research permitting system established by the project remains legally in place and continues to be used, the electronic permitting platform is currently not operational, and application processing is being carried out manually by DEPP. This shift to a manual process has exacerbated some users' discontent regarding processing times and procedures, particularly researchers who depend on the timely approval of permits to carry out field and laboratory work. The main challenge relates to the need for dedicated technical support and system maintenance capacity to restore and sustain full functionality of the electronic platform. While DEPP has indicated its commitment to strengthening the permitting process and exploring options to update or rebuild the system, ensuring its reliability and usability will be essential for safeguarding the efficiency, transparency, and accessibility of ABS procedures in the long term.
144. Regarding Strategic Question Three, the review finds that while the project successfully established the national ABS framework and promoted its recognition among government and research institutions, expected benefits for local knowledge holders have not yet materialized in a tangible or visible way. Engagement with community-level actors, including traditional knowledge holders, occurred to some extent during awareness activities; however, this participation was limited and did not translate into sustained involvement or co-development of benefit-sharing opportunities. As a result,

awareness of how the ABS system could generate direct benefits remains low among these groups, and incentives to actively engage with the framework have yet to take shape. Moving forward, targeted outreach and dialogue will be essential to build trust, clarify the practical value of ABS for local knowledge custodians, and support their meaningful inclusion in future benefit-sharing arrangements.

145. Regarding Strategic Question Four, the review finds that the financial sustainability of the ABS framework remains partially dependent on the availability of government resources to maintain and operate key functions, particularly the research permitting process and the supporting IT platform. While the legislative and institutional foundations do not require large recurring expenditures, the functionality of the system does require ongoing technical support and operational follow-up. At present, gaps in IT capacity and system maintenance are affecting the timely processing of applications, which in turn influences stakeholder confidence in the framework. Continued government commitment and the development of sustainable funding or cost-sharing arrangements will therefore be important to ensure the effective operation and long-term viability of the ABS system.
146. The table below provides a summary of the ratings and findings discussed in Chapter IV. Overall, the project demonstrates a rating of Moderately Satisfactory.

UNEP Evaluation Office Validation of Performance Ratings:

The UNEP Evaluation Office formally quality assesses (see Annex XI) management led Terminal Review reports and validates the performance ratings therein by ensuring that the performance judgments made are consistent with evidence presented in the Review report and in-line with the performance standards set out for independent evaluations.

The Evaluation Office assesses a Terminal Review report in the same way as it assesses the initial draft of a Terminal Evaluation report. It applies the following assumptions in its validation process:

- That what is being assessed is the contents of the report and the extent to which it makes a consistent and justifiable case for the performance ratings it records.
- That the consultant has, within the report, presented all the evidence that was made available to them.
- That the Review has been based on a robust Theory of Change, reconstructed where necessary, which reflects UNEP's definitions at all levels of results.
- That the project team and key stakeholders have already reviewed a draft version of the report and provided substantive comments and made factual corrections to the Review Consultant, who has responded to them. The Evaluation Office assumes, therefore, that it has received the Final (revised) version of the report.

In this instance the Evaluation Office validates the overall project performance rating at the **'Moderately Satisfactory'** level.

Table 18: Summary of project findings and ratings²⁵

Criterion	Summary assessment	Rating	Justification for any ratings' changes due to validation (to be completed by the UNEP Evaluation Office – EOU)	EOU Validated Rating
Strategic Relevance		S	Rating validated	S
1. Alignment to UNEP MTS, POW and strategic priorities	The project showed clear alignment with UNEP's MTS and PoW priorities by supporting national implementation of the Nagoya Protocol, strengthening institutional capacity, and advancing ABS policy and legal frameworks. Alignment with the Bali Strategic Plan and South-South cooperation was present but indirect, mainly through capacity building and information exchange rather than explicit programmatic design.	S	Rating validated	S
2. Alignment to Donor/Partner strategic priorities	The project aligned well with GEF-5 Biodiversity Objective 4 by supporting the establishment of a national ABS framework, and it was consistent with UNEP's mandate to strengthen environmental governance. It also responded to national priorities in The Bahamas to operationalize ABS legislation and build institutional capacity.	S	Rating validated	S
3. Relevance to global, regional, sub-regional and national environmental priorities	The project was well-aligned with global and national biodiversity priorities, including implementation of the CBD, the Nagoya Protocol, the Aichi Targets, and The Bahamas' NBSAP. While regional alignment was present conceptually, concrete engagement at the Caribbean sub-regional level was more limited.	MS	Rating validated	MS
4. Complementarity with relevant existing interventions/coherence	The project complemented ongoing regional and national ABS initiatives, aligning with Caribbean and Latin American capacity-building efforts and integrating ABS into existing biodiversity governance structures in The Bahamas. Coordination avoided duplication and reinforced policy and institutional coherence.	S	Rating validated	S

²⁵ Most criteria will be rated on a six-point scale as follows: Highly Satisfactory (HS); Satisfactory (S); Moderately Satisfactory (MS); Moderately Unsatisfactory (MU); Unsatisfactory (U); and Highly Unsatisfactory (HU). Sustainability and Likelihood of Impact are rated, also on a six-point scale, from Highly Likely (HL) down to Highly Unlikely (HU), and Nature of External Context is rated from Highly Favorable (HF) to Highly Unfavorable (HU).

Criterion	Summary assessment	Rating	Justification for any ratings' changes due to validation (to be completed by the UNEP Evaluation Office – EOU)	EOU Validated Rating
Quality of Project Design	The project design was coherent and well-structured, with clear components, outputs, governance arrangements, and financial planning. Risks and safeguards were addressed. However, the absence of a formal Theory of Change, limited planning for sustainability and replication, and the fact that engagement strategies were not developed in detail for all stakeholder groups—particularly at the community and private sector levels—reduced the clarity of causal pathways and long-term uptake.	MS	Rating validated	MS
Nature of External Context	Project implementation was notably shaped by external and institutional circumstances that affected the timely execution of activities. During the early years, progress was delayed due to the need to secure stable government commitment and define institutional coordination arrangements, which resulted in a late start, and the approval of a first no-cost extension. Once implementation was underway, the COVID-19 pandemic created further constraints on in-person coordination, training, and stakeholder engagement, leading to a second no-cost extension. While the project adapted through virtual modalities and maintained momentum, these contextual factors contributed to a longer implementation period than originally planned.	MU	Rating validated	MU
Effectiveness		S	Rating validated	S
1. Availability of outputs	The project delivered its core planned outputs, including the accession to the Nagoya Protocol, the adoption of the ABS Act (2021), and the development of procedures for PIC, MAT, and benefit-sharing. The ABS online permitting system was developed and initially deployed, although technical constraints since then have reduced its consistent use. Capacity-building and awareness activities were partially implemented but remained modest in scope, with uneven reach across stakeholder groups. The population modelling study provides an initial scientific basis to inform future ABS-related management decisions, but further work is required to translate this baseline into sustained practice and operational uptake.	S	According to the assessment presented in Table 14 (Page 31), 5 outputs were fully delivered, whereas 5 were partially delivered. Therefore, the rating is adjusted to 'Moderately Satisfactory' as per guidance presented in the 05 TR Criteria Ratings Description Matrix 05.06.25.docx	MS

Criterion	Summary assessment	Rating	Justification for any ratings' changes due to validation (to be completed by the UNEP Evaluation Office – EOU)	EOU Validated Rating
2. Achievement of project outcomes	The project achieved its key intended outcomes, most notably the accession to the Nagoya Protocol and adoption of the ABS Act, which established the national legal framework for Access and Benefit-Sharing. The permitting system was developed and introduced, providing the basis for operationalizing ABS processes, although it is not yet fully functional and continues to face technical and procedural challenges. The pilot initiatives made partial progress in developing the basic knowledge for the future implementation of ABS. Overall, the project strengthened national readiness for ABS, though further work is required to ensure full operational uptake.	S	Rating validated	S
3. Likelihood of impact	The project established the key legal and institutional conditions for long-term ABS implementation, including accession to the Nagoya Protocol, adoption of the ABS Act, and development of the permitting system. These outcomes provide a foundation for future benefit-sharing and biodiversity conservation impacts. However, the system is not fully operational, and the practical application of ABS principles—including inter-agency coordination, broader stakeholder participation, and benefit-sharing arrangements—remains at an early stage. Realization of broader conservation and socio-economic impacts will depend on sustained political commitment, technical strengthening, and continued engagement of research and community stakeholders.	ML	Rating validated	ML
Financial Management		S	Rating validated	S
1. Adherence to UNEP's financial policies and procedures	The project adhered consistently to UNEP's financial policies and the procedures set out in the PCA. Expenditures were aligned with approved work plans, and annual external audits reported no findings of mismanagement or non-compliance. Financial reporting and oversight were timely and complete throughout implementation.	S	Rating validated	S
2. Completeness of project financial information	Financial information was complete, accurate, and aligned with UNEP's reporting requirements. Fourteen budget revisions were processed, but these reflected routine adjustments rather than structural reallocations. Expenditure records were consistent with audit findings, and co-financing contributions exceeded initial commitments.	S	Rating validated	S

Criterion	Summary assessment	Rating	Justification for any ratings' changes due to validation (to be completed by the UNEP Evaluation Office – EOU)	EOU Validated Rating
Efficiency	The project required two no-cost extensions due to delayed start-up and the COVID-19 pandemic, resulting in a significantly longer implementation period than planned. However, core outputs were completed within the approved budget, and adaptive management (including virtual coordination and sequencing of activities) enabled continued progress. The project made efficient use of national institutional structures, and no additional resources were required to deliver the foundational ABS framework. Overall efficiency is considered moderately satisfactory, reflecting delays but effective delivery of key outcomes within existing financial resources.	MS	The project - approved in 2016 - experienced significant delays especially during its first three years. Eventually, two no-cost extensions, which totalled to 4.5 years, were granted to complete planned activities and the project ended in 2024. Rating adjusted to 'Moderately Unsatisfactory' as per guidance presented in the 05 TR Criteria Ratings Description Matrix 05.06.25.docx	MU
Monitoring and Reporting		MS	Rating validated	MS
1. Monitoring of project implementation	Monitoring arrangements enabled regular tracking of activities and outputs through progress reports and coordination meetings, which supported adaptive management during implementation challenges and extensions. However, monitoring remained focused at the activity and output levels, and did not capture operational use of the ABS system or track participation of stakeholder groups, including community actors. Gender representation was described qualitatively but not measured through indicators. Overall, monitoring was functional but limited in scope.	MS	Rating validated	MS
2. Project reporting	Project reporting complied with UNEP requirements and was delivered in a timely and organized manner through PIRs, PPRs, PERs, and completion documents. Reports provided clear updates on progress and implementation challenges, supporting oversight and adaptive management. However, while reporting captured institutional participation, it did not reflect perspectives from a broader set of stakeholders, as engagement with academic researchers, and community actors was limited. As a result, reporting partially documented the diversity of stakeholder views relevant to ABS implementation.	MS	Rating validated	MS

Criterion	Summary assessment	Rating	Justification for any ratings' changes due to validation (to be completed by the UNEP Evaluation Office – EOU)	EOU Validated Rating
Sustainability		ML	The rating is adjusted to Moderately Unlikely Sustainability sub-categories are aggregated to the lowest rating, as they are considered mutually limiting factors.	MU
1. Socio-political sustainability	The project generated meaningful socio-political support—evidenced by the accession to the Nagoya Protocol, adoption of the ABS Act, and continued institutional leadership by DEPP. The ABS Committee provides a mechanism for sustaining coordination beyond the project. However, long-term sustainability will depend on addressing concerns raised by researchers and other potential users regarding specific provisions of the ABS framework—particularly those perceived as placing constraints on research and collaboration. Renewed outreach and dialogue will be needed to strengthen confidence and encourage broader uptake.	ML	Rating validated	ML
2. Financial sustainability	The ABS legal framework remains in place; however, the continued operation and improvement of the permitting system requires stable financial and technical resources. Ongoing needs include IT technical maintenance, IT capacity, user support, and staff time. Since project closure, technical issues and reduced platform performance have affected the permitting process, and discussions on replacing or redesigning the system indicate that current resources may be insufficient to ensure its long-term functionality. Without sustained operational funding and technical capacity, the practical uptake of the ABS framework may remain limited.	MU	Rating validated	MU
3. Institutional sustainability	The project established a solid institutional basis for ABS implementation through the adoption of the ABS Act and the formalization of the ABS Committee, providing clear governance roles and procedures. DEPP continues to demonstrate leadership and commitment to advancing the ABS agenda. While coordination among institutions has been less consistent since project closure, and some users seek clearer guidance on procedures and fees, these issues could be addressed through renewed inter-agency engagement and strengthened communication. Continued leadership from DEPP, accompanied by consistent coordination and procedural clarification, will be key to maintaining institutional functionality over time.	ML	Rating validated	ML

Criterion	Summary assessment	Rating	Justification for any ratings' changes due to validation (to be completed by the UNEP Evaluation Office – EOU)	EOU Validated Rating
Factors Affecting Performance		MS	Rating validated	MS
1. Quality of project management and supervision	Project management and supervision were satisfactory. Once implementation gained full momentum in 2019, coordination led by DEPP was consistent and effective in moving key processes forward, including the adoption of the ABS Act and the establishment of the permitting system. The Project Manager provided stable leadership, maintained communication across involved institutions, and ensured timely reporting and adherence to UNEP procedures. UNEP supervision was regular and supportive, offering technical and administrative guidance throughout implementation. While engagement beyond core government actors—particularly with the research and local communities—was more limited, the management structure functioned well to deliver the project's principal outcomes and to maintain alignment with national priorities.	S	Rating validated	S
2. Stakeholders' participation and cooperation	Stakeholder participation was strong among core government institutions, with active coordination through the Steering Committee and meaningful technical contributions from legal and IT experts. This cooperation supported the development of the ABS Act and permitting framework. Engagement with academic researchers was present but not sustained throughout all phases of implementation, and participation from community-level actors was limited. While cooperation was sufficient to establish the legal and institutional foundation, broader and more structured engagement will be important to support practical uptake and long-term acceptance of the ABS system.	MS	Rating validated	MS
3. Responsiveness to human rights and gender equality	Gender balance was visible at the institutional level, with women occupying several key leadership and technical roles throughout the development of the ABS framework. However, this representation reflected existing staffing structures rather than a deliberate gender mainstreaming approach. Engagement with local communities was limited, and no mechanisms were described to ensure inclusive participation or to systematically integrate diverse perspectives into the design or operationalization of the ABS regime. As a result, while institutional participation included women, broader inclusion and equity considerations were not consistently addressed during implementation.	MU	Rating validated	MU

Criterion	Summary assessment	Rating	Justification for any ratings' changes due to validation (to be completed by the UNEP Evaluation Office – EOU)	EOU Validated Rating
4. Environmental and social safeguards	Environmental and social safeguard considerations were identified at design and managed proportionately to the project's low-risk profile. Implementation records show compliance with UNEP safeguard requirements, and no adverse environmental or social impacts occurred. Participation in consultations was primarily among government and technical institutions, with visible involvement of women in these spaces. However, engagement at the community level remained limited, meaning that broader social inclusion objectives were only partially achieved.	MS	Rating validated	MS
5. Country ownership and driven-ness	The project benefited from strong national ownership, demonstrated by the Government of The Bahamas' leadership in acceding to the Nagoya Protocol, adopting the ABS Act, and establishing the permitting system. The DEPP played a central coordinating role, ensuring alignment with national biodiversity policy priorities. However, ownership outside core government institutions was less consistent, particularly among research institutions and other stakeholders who were not fully engaged during later operational phases. Continued inter-agency coordination and clearer communication will be important to sustain shared ownership moving forward.	S	Rating validated	S
6. Communication and public awareness	Communication and public awareness activities were carried out through a couple of radio and television campaigns, informational materials, and stakeholder workshops, which contributed to understanding of ABS concepts among different stakeholder groups. Academic and research stakeholders were aware of the framework; however, communication during the transition from legal development to operational implementation was not sustained, leading to concerns—particularly regarding procedures and fees associated with the permitting system. Outreach to local actors and resource users was also limited in depth. As a result, awareness was generated, but it did not fully translate into informed or confident participation across all stakeholder groups.	MU	Rating validated	MU

Criterion	Summary assessment	Rating	Justification for any ratings' changes due to validation (to be completed by the UNEP Evaluation Office – EOU)	EOU Validated Rating
Overall Project Performance Rating	The project successfully established the national ABS framework, including accession to the Nagoya Protocol, adoption of the ABS Act, and development of the permitting system. These achievements represent meaningful progress in strengthening biodiversity governance in The Bahamas. However, practical application of the ABS system remains limited, as the permitting platform and associated procedures require further refinement, stakeholder engagement was uneven, and communication was not sustained beyond core government institutions. Capacity-building, outreach, and operational consolidation will be needed to fully translate the legal and institutional advances into effective and widely supported practice. Overall, the project performed satisfactorily in delivering foundational outcomes, while challenges remain for operational uptake and long-term sustainability.	MS	Overall Performance Rating validated	MS

B. Lessons Learned

Lesson Learned #1:	High-level political support is critical for enabling the adoption of legal instruments.
Context/comment:	In this project, the approval of the ABS Act was only achieved once there was sustained political support at ministerial and senior government levels. Even where technical work, drafting, and stakeholder consultation are strong, new legislation does not move forward without active endorsement from high-level decision-makers who can prioritize it within national political processes. Future ABS or similar policy initiatives should therefore engage political leadership early, maintain periodic briefings with decision-makers, and ensure that strategic messaging highlights the national relevance and benefits of adopting new frameworks. This helps preserve momentum and reduces the risk of delays when institutional priorities shift.
Cross-reference(s) to relevant paragraphs	See mainly Review Report paragraphs 87-90; Tables 13 and 14.

Lesson Learned #2:	Sustained political commitment and clear institutional leadership are essential to establishing and maintaining a functional ABS regime.
Context/comment:	The development and adoption of the national ABS framework in The Bahamas—including accession to the Nagoya Protocol, passage of the ABS Act, and establishment of the online permitting system—were possible due to strong governmental backing and the sustained leadership of the Department of Environmental Planning and Protection (DEPP). The Project Manager played a pivotal role in coordinating institutions, maintaining momentum, and ensuring technical progress during periods of administrative change. This experience demonstrates that ABS implementation requires: (i) consistent high-level political support, (ii) a clearly mandated lead institution to anchor coordination, and (iii) committed operational leadership to move processes forward. Maintaining institutional engagement after project closure is critical to preserve continuity, strengthen uptake, and ensure that equitable benefit-sharing and the protection of genetic resources remain active national priorities over time.
Cross-reference(s) to relevant paragraphs	See mainly Review Report paragraphs 6, 90, 93, 119, 134, 147; Tables 13 and 14.

Lesson Learned #3:	Broad stakeholder engagement, including explicit consideration of gender and human rights dimensions, is essential not only during legal drafting but also throughout the operationalization of ABS systems.
Context/comment:	The project successfully engaged key governmental and academic stakeholders during the development of the ABS Act, contributing to strong institutional ownership of the legal framework. However, engagement with research institutions during later operational stages was more limited, and participation by community-level actors did not extend beyond initial awareness-raising activities. This experience underscores that effective ABS implementation requires sustained dialogue with all actors who interact with permitting procedures and benefit-sharing mechanisms in practice. While gender and human rights considerations were not explicitly embedded in the project design or results framework, the project was guided by a “do no harm” approach. Furthermore, the ABS framework, as underpinned by the Nagoya Protocol, is inherently aligned with principles of social equity through its focus on fair and equitable benefit sharing. Making these considerations more explicit in future initiatives—particularly during

	the operational phase and through inclusive engagement strategies—could strengthen trust, improve system uptake, and enhance the social equity outcomes of ABS implementation.
Cross-reference(s) to relevant paragraphs	See mainly Review Report paragraphs 33-37;123-124.

Lesson Learned #4:	The establishment of a national ABS digital permitting system was a major achievement, but sustained technical support and clear procedural guidance are required to ensure effective use.
Context/comment:	The project successfully developed and launched the ABS online permitting system, a major step toward operationalizing ABS procedures. After project closure, limited in-country IT maintenance contributed to performance issues and reduced system efficiency. Several researchers expressed concerns about procedural requirements and fee structures rather than platform usability. This experience shows that online permitting systems need ongoing technical support and periodic updates alongside clear, continuous communication and guidance on procedures and costs, to sustain functionality and user confidence over time.
Cross-reference(s) to relevant paragraphs	See mainly Review Report paragraphs 5-7; 9, 88, 93, 114-117; 129, 132-133; 140-141; Tables 13 and 14.

Lesson Learned #5:	Pilot activities must be brought to full implementation to generate practical ABS experience and support operational uptake.
Context/comment:	The project designed three pilot initiatives intended to demonstrate how ABS procedures could function in practice. While the population modeling pilot for <i>Antillogorgia elisabethae</i> progressed and generated valuable scientific and management insights, the other pilots remained at preparatory stages. As a result, no full operational cases of Prior Informed Consent (PIC), Mutually Agreed Terms (MAT), or benefit-sharing arrangements—monetary or non-monetary—were finalized during the project period. This experience highlights that establishing the legal framework and institutional procedures is only one part of operationalizing ABS. To ensure that stakeholders understand how ABS works in real situations, pilot initiatives need to be carried through to completion, including the negotiation of permits, co-design of benefit-sharing conditions, and documentation of lessons from both commercial and non-commercial research use. Completing such pilots not only strengthens institutional capacity but also helps build user confidence, clarifies expectations, and provides tangible reference cases that demonstrate how benefit-sharing supports conservation and national development goals.
Cross-reference(s) to relevant paragraphs	See mainly Review Report paragraphs 89, 110; Tables 13, 14 and 15.

Lesson Learned #6:	Public awareness and communication strategies must be continuous, multi-sectoral, and inclusive in order to support sustained ABS implementation.
Context/comment:	The project carried out awareness activities that were effective in informing government institutions about ABS roles and responsibilities, and several women in leadership positions played a visible role in decision-making bodies. However, communication and outreach efforts were not sustained at the same level across all stakeholder groups, particularly academic researchers and local community actors. This resulted in uneven understanding of the permitting system and its implications, as well as missed opportunities to build broader support and trust around benefit-sharing arrangements.

	ABS implementation depends on the participation and understanding of all actors involved in genetic resource access and use, including minority and community-level groups who may hold traditional or practice-based knowledge. Future initiatives should ensure that public awareness strategies are designed as ongoing processes rather than one-time dissemination activities, incorporating gender-aware and culturally appropriate communication channels, feedback mechanisms, and opportunities for dialogue that continue beyond the legal drafting phase. This approach helps ensure system legitimacy, encourages compliance, and supports equitable participation in benefit-sharing.
Cross-reference(s) to relevant paragraphs	See mainly Review Report paragraphs 5-6; 9, 83, 90, 94, 124, 128, 131-132, 144, 146; Tables 13, 14 and 15.

C. Recommendations

Recommendation #1:	It is recommended that DEPP address the technical issues of the ABS online permitting system and provide clear guidance to system users, including introducing a streamlined permit renewal process that avoids requiring new applications for ongoing or multi-year research activities, as a matter of immediate priority.
Challenge/problem to be addressed by the recommendation:	The current ABS electronic permitting platform is experiencing challenges in functionality and processing, and users have indicated uncertainty regarding procedures and permit renewal requirements. These issues risk limiting effective uptake and operationalization of the ABS system.
Cross-reference(s) to relevant paragraphs	See mainly Review Report paragraphs 5-7; 9, 88, 93, 114-117; 129, 132-133; 140-141.
Priority Level:	High
Type of Recommendation	Operational / Sustainability
Responsibility:	Department of Environmental Planning and Protection (DEPP), in coordination with the ABS Committee and IT service provider(s).
Proposed implementation timeframe:	By June 2026

Recommendation #2:	It is recommended that DEPP reconvene the ABS Committee—as mandated by national ABS legislation—to assess the actions needed to sustain the project’s achievements, review the permitting system requirements, and introduce improvements that address the concerns raised by the research sector while strengthening inclusion, communication, and consideration of gender and human rights dimensions in engagement with local communities. In doing so, the Committee should take into account essential personnel turnover within the component agencies and ensure that routine capacity-building measures are regularly implemented. Reactivating regular Committee meetings will be essential to support the continued implementation of the ABS framework.
Challenge/problem to be addressed by the recommendation:	After project closure, coordination across institutions has weakened and communication with key stakeholder groups, particularly researchers and local community actors—has been limited. The ABS Committee has not met regularly, reducing opportunities for shared oversight, feedback, and forward planning. This has constrained the ability to address operational concerns in a participatory manner and to ensure that ABS implementation remains inclusive and aligned with broader human rights and gender equity principles underpinning the Nagoya Protocol.
Cross-reference(s) to relevant paragraphs	See mainly Review Report paragraphs: 5-6; 9, 83, 90, 94, 124, 128, 131-132, 144, 146.
Priority Level:	High

Type of Recommendation	Institutional Coordination / Stakeholder Engagement
Responsibility:	Department of Environmental Planning and Protection (DEPP) to convene and coordinate ABS Committee members to participate.
Proposed implementation timeframe:	Hold an ASB Committee meeting by the end of February 2026.

Recommendation #3:	UNEP is encouraged to consider using the ABS experience in The Bahamas—the first country globally to develop and operationalize an online ABS permitting system—as a reference case in regional knowledge-sharing and capacity-building efforts, including ongoing initiatives such as the GEF ABS Project in Saint Lucia (Project 10840). Highlighting the legal and institutional achievements, as well as the lessons learned during the system’s operationalization, can support peer learning and provide a practical example for countries in the Caribbean and Latin America that are in the process of establishing or strengthening their ABS systems and digital access procedures. This experience offers a concrete and scalable model that could inform future ABS project design and implementation under the UNEP–GEF portfolio.
Challenge/problem to be addressed by the recommendation:	The project resulted in a solid legal and institutional ABS framework in The Bahamas, which offers relevant insights for other Caribbean and Latin American countries. However, this experience has not been shared systematically in regional forums. Presenting it as a reference case could support evidence-based decision-making and informed uptake of best practices in other contexts.
Cross-reference(s) to relevant paragraphs	See mainly Review Report paragraphs: 6, 35, 79-80; 82, 105, 134, 143.
Priority Level:	Medium
Type of Recommendation	Knowledge-sharing / South-South cooperation
Responsibility:	UNEP Law Division and UNEP ROLAC
Proposed implementation timeframe:	During the next scheduled regional ABS knowledge-sharing or capacity-building event in which UNEP participates or convenes.

Annex I. RESPONSE TO STAKEHOLDER COMMENTS

Only include this annex if there were any stakeholder comments that were not (fully) accepted by the consultant. If all comments were accepted, delete this annex.

Response to stakeholder comments received but not (fully) accepted by the reviewers, where appropriate

Page Ref	Stakeholder comment	Reviewer Response

Annex II. REVIEW FRAMEWORK

REVIEW QUESTIONS	METHODS	SOURCES OF INFORMATION
Strategic Questions		
1. What is the level of awareness of the ABS national framework among regulatory entities and beneficiaries? How have they been engaged in its operation and management, and is there post-project clarity on benefit-sharing mechanisms?	Semi-structured interviews, document review	Regulatory agencies, local authorities, project reports, capacity-building materials
2. How efficiently is the ABS research permitting system being managed? Are there issues in submission and processing of applications? What challenges remain in accessing and using the system?	Key informant interviews, document review, process analysis	Executing agency, permitting system, researchers/applicants, ABS Clearing House reports
3. How is the ABS framework perceived by national beneficiaries (e.g., holders of traditional knowledge)? Have they been incentivized to engage, and what barriers exist to their full participation?	Interviews, visit to The Bahamas, document review	Traditional knowledge holders, local communities, community leaders, awareness campaign documentation
4. What is the level of financial sustainability in maintaining the ABS framework? What cost recovery modalities exist among regulatory agencies, and what are the financial gaps or risks?	Financial document analysis, interviews with agency staff	Budget and financial reports, regulatory agency staff, Ministry of Finance/administration representatives
Strategic relevance		
5. To what extent is the project aligned with the UNEP Medium-Term Strategy (MTS), Programme of Work (PoW), and UNEP's strategic priorities at the time of project approval?	Document review	Project Document, UNEP MTS, UNEP PoW, Evaluation Office guidelines
6. How well does the project align with the strategic priorities of the donor (e.g., GEF) and other relevant partners?	Document review, key informant interviews	GEF Focal Area Strategies, Donor strategy documents, UNEP project team
7. Is the project relevant to current global, regional, sub-regional, and national environmental priorities, policies, or plans?	Document review, semi-structured interviews	National environmental policies, NBSAPs, NDCs, regional frameworks, national focal points
8. To what extent is the project complementary and coherent with other existing or planned interventions that address similar issues or target the same groups?	Stakeholder mapping, semi-structured interviews, content analysis	Reports from related initiatives, partner agencies, implementing/executing agencies, UNEP staff
Quality of Project Design		
See section 3 and Annex II of this Inception Report		Project progress reports/PIR
Nature of External Context		
9. Did the (political, environmental, social, institutional) context change during project implementation and how did the project adapt to this?	Semi-structured interviews	Project progress reports/PIR, interviews with project team and key stakeholders
Effectiveness		
Availability of Outputs		
10. How successful was the project in producing the programmed outputs,	Semi-structured interviews, trend	ProDoc, MTR, project progress reports /PIR, tangible

REVIEW QUESTIONS	METHODS	SOURCES OF INFORMATION
both in quantity and quality, as well as their usefulness and timeliness?	harvesting, content analysis	products, interviews with project manager and organizations that were involved in the project's implementation
11. Were key stakeholders appropriately involved in producing the programmed outputs?	Semi-structured interviews, mapping, content analysis	ProDoc, MTR Project progress reports /PIR, MTR, terminal reporting, interviews with key project stakeholders and project beneficiaries
12. What were the main reasons that led to a satisfactory or unsatisfactory generation of outputs?	Semi-structured interviews, content analysis	Project progress reports /PIR, MTR, terminal reporting, interviews with key project stakeholders and project beneficiaries
Achievement of Project Outcomes		
13. To what extent were the project outcomes achieved? Namely: Outcome 1.1. National Strategy and Accession to the Nagoya Protocol Outcome 2.1. Increased understanding of the national benefits to be accrued through ABS Outcome 2.2. National ABS legal framework adopted Outcome 2.3. Strengthened national institutional capacity for implementation of the national ABS framework Outcome 3.1. ABS principles applied to adjusted commercial and non-commercial research permits	Document review, content analysis, semi-structured interviews	Project progress reports /PIR, interviews MTR, workshop reports, terminal reporting, ABS guidelines, interviews with key project stakeholders
14. To what extent did the project contribute to the adherence to the Nagoya Protocol, as well as to the development of national and institutional capacities for implementing an appropriate ABS regime in The Bahamas?	Semi-structured interviews, stakeholder mapping, TOC-based evaluation	ABS Benchmark Analysis, briefing session with senators and parliamentarians, ABS Act 2021, MTR, workshop reports, terminal reporting, interviews with project team, national agencies, other project partners
15. To what extent can the outcomes obtained (as described in question 13) be directly attributed because of the project's actions?	Content analysis, trend harvesting, stakeholder mapping	Project progress reports /PIR, interviews MTR, workshop reports, terminal reporting
Likelihood of impact		
16. To what extent is the project's Theory of Change coherent and realistic in outlining the pathway from outcomes to long-term impact?	Theory-based evaluation, contribution analysis, document review, stakeholder interviews	Reconstructed Theory of Change, project design documents and logical framework, progress and final reports
17. Has the project contributed to any catalytic effects, such as scaling up, replication, or policy uptake, that are likely to enhance long-term impact?	Outcome harvesting, trend analysis, key stakeholder interviews, document review	National policy documents, reports from partners and implementing agencies, project progress reports /PIR
18. What unintended (positive or negative) effects have emerged from the project, and what is their potential influence on the likelihood of long-term impact?	Stakeholder interviews, visit to The Bahamas, content analysis	Project progress reports /PIR, interviews MTR, workshop reports, terminal reporting

REVIEW QUESTIONS	METHODS	SOURCES OF INFORMATION
19. To what extent is the project likely to contribute to long-lasting environmental and human well-being outcomes, such as the Sustainable Development Goals, UNEP's Expected Accomplishments, and partner priorities?	Outcome mapping, semi-structured interviews, document review, content analysis	Project results and monitoring report, UNEP Programme of Work and SDG targets, information of donors and partners, final reporting, interviews with UNEP staff and implementing partners
Financial Management		
20. To what extent did the project adhere to UNEP's financial policies, procedures, and standards throughout its implementation?	Document review, semi-structured interviews	Project progress and financial reports, internal audit reports, interviews with finance and project management staff
21. How complete, accurate, and timely was the project's financial information, including expenditure reporting at output level and communication between finance and project management staff?	Financial data verification, process mapping, semi-structured interviews	Budget vs. expenditure reports, output-level financial breakdowns, progress and financial reports
22. Did financial management issues, such as gaps in documentation or tracking of in-kind contributions, affect the timeliness of the project or the quality of its results?	Document review, semi-structured interviews	Project progress and completion reports, stakeholder interviews, reports of in-kind contributions
Efficiency		
23. To what extent did the project deliver maximum results with the resources available, in terms of cost-effectiveness and timeliness?	Document review, comparative analysis of planned vs. actual costs and timelines, semi-structured interviews	Work plans, budgets, financial reports, progress reports, interviews with project team and partners
24. Were there events /activities that could have been sequenced differently for better results delivery (coherency of project workplan)?	Document review, analysis of measures adopted, semi-structured interviews	Project progress reports/PIR, work plans, terminal reporting, interviews with project team
25. What obstacles did the project face that led to the need to extend its original duration? Did the delay in implementation affect project outcomes? Could these delays have been avoided?	Review of requests and approvals, analysis of causes, semi-structured interviews	Project progress reports/PIR, extension requests and approvals, MTR, terminal reporting, interviews with project manager, executing agency
26. Was adaptive management applied adequately? Was any cost- or time saving measure put in place in attempting to bring the project as far as possible in achieving its results within its budget and time?	Document review, contribution analysis	Project progress reports/PIR, MTR, interviews with project manager, executing agency
27. To what extent did the project build on existing institutions, agreements, data sources, synergies, and complementarities to enhance efficiency?	Mapping of partnerships, analysis of integration during implementation, interviews	Collaboration agreements, implementation reports, partnership registers, interviews with partners and technical staff
Monitoring and Reporting		
Monitoring of project implementation		
28. To what extent was the project's M&E plan viable, outcome-based, and included SMART indicators?	Document review, outcome mapping, semi-structured interviews	ProDoc, MTR, interviews with project manager, periodic reports, terminal reporting

REVIEW QUESTIONS	METHODS	SOURCES OF INFORMATION
29. Was the M&E system operational and did it facilitate timely tracking of results and progress towards project objectives during the project implementation period? Were the results used to improve project performance and adapt to changing needs? How did the project perform against the initially stated objectives?	Document review, outcome mapping, content analysis, semi-structured interviews	Project progress reports/PIR, interviews with key stakeholders, response to MTR suggestions
30. How did project team monitor the participation of disaggregated groups (gendered, marginalized or vulnerable groups, including those living with disabilities) in project activities?	Document review, semi-structured interviews	Periodic reports, terminal reporting, interviews with project manager, key stakeholders, beneficiaries
Project reporting		
31. How timely and consistent has project reporting been in meeting UNEP and donor requirements?	Document review, timeline analysis, comparison with agreed reporting schedules	Project progress reports/PIR, donor-specific reporting records
32. Were PIR reports, and half-yearly Progress & Financial Reports complete and accurate?	Document review, content analysis	Progress reports/PIR
33. How well has the reporting system captured relevant results and progress for different stakeholder groups, including disaggregated data?	Content analysis of reports, comparison with monitoring framework, semi-structured interviews	Project progress reports/PIR, interviews with project manager, executing agency
Sustainability		
Socio-political sustainability		
34. Are there social or political factors that may positively or negatively influence the sustenance of project outcomes and progress towards impacts?	Document review, content analysis, semi-structured interviews	Project progress reports/PIR, interviews with project team, key stakeholders
35. How likely is it that the project executing institution, the government institutions that were part of the project, or other stakeholders will undertake individual efforts to continue to work on strengthening the ABS regime in The Bahamas?	Semi-structured interviews, document review, mapping of ongoing or planned ABS-related initiatives	Available institutional work plans, national ABS strategy or policy documents, stakeholder commitment letters, capacity-building plans (if available)
Financial sustainability		
36. To what extent does the continuation of project outcomes and eventual impact depend on financial resources? What is the likelihood that sufficient financial resources will be available to continue the permitting system, regulatory strengthening, and ABS-related activities in line with the project outcomes?	Financial analysis, semi-structured interviews, desk review of past funding trends for ABS-related activities	Institutional budgets (if available), new funding proposals, interviews with project manager and key stakeholders
Institutional Sustainability		
37. How likely is it that the policy, strategy, law, capacity, or institutional collaborations enhanced by the project will be sustained over time to continue to support efforts to strengthen the ABS regime and compliance	Document review, content analysis, assessment of integration of ABS-related	Institutional plans, policies, budgets or agreements (if available), interviews with key stakeholders

REVIEW QUESTIONS	METHODS	SOURCES OF INFORMATION
with the Nagoya Protocol in The Bahamas?	mandates into institutional procedures, semi-structured interviews	
38. What is the likelihood that executing partners, government institutions, and other stakeholders will continue with the institutional capacity-building efforts aimed at strengthening the ABS regime in The Bahamas?	Document review, contribution analysis, semi-structured interviews	Institutional plans, policies, budgets or agreements (if available), interviews with key stakeholders
Factors affecting project performance and cross cutting issues		
Quality of project management and supervision		
39. How effectively has UNEP (or the Implementing/Executing Agency) provided leadership and guidance to achieve planned outcomes?	Document review, analysis of project progress against milestones, interviews	Project progress reports/PIR, meeting minutes, interviews with UNEP staff and partners
40. How well have project management structures and partner relationships (e.g., Steering Groups) been maintained and utilized?	Document review, stakeholder interviews, analysis of meeting records (if available)	Project progress reports/PIR, Steering Group minutes, partnership agreements
41. How effectively has the project adapted to changes in external and strategic contexts, including risk management and problem-solving?	Document review, interviews with key stakeholders, timeline mapping of adaptations	Adaptive management documentation, project revision records, interviews with UNEP and partner staff
42. How clear and effective has the communication and collaboration been between UNEP, the project team, and key stakeholders?	Survey of stakeholders, interviews, content analysis	Meeting records, project updates, project progress reports/PIR
Stakeholder participation and cooperation		
43. To what extent did the project achieve effective stakeholder participation and/or collaboration?	Document review, stakeholder mapping, semi-structured interviews	ProDoc, progress reports/PIR, interviews with key stakeholders, communication strategy and records of strategic communication activities
44. To what extent were stakeholders involved in: (a) project design (b) the sharing of lessons learnt from the project, and (c) the sharing of expertise and technical knowledge, or the pooling of resources?	Document review, stakeholder mapping, semi-structured interviews	ProDoc, workshop reports, terminal reporting, interviews with key stakeholders
Responsiveness to human rights and gender equity		
45. To what extent were gender issues and the inclusion of minority groups considered in the project's activities and results?	Document review, content analysis, minority groups mapping	Periodic reports, MTR, workshop reports, terminal reporting
Environmental and social safeguards		
46. To what extent did the project comply with UNEP's environmental and social safeguard requirements, including regular risk review, monitoring, and implementation of mitigation measures?	Document review, key informant interviews, compliance checklist analysis	Environmental and social safeguard reports, risk assessment records, monitoring reports, project progress reports, interviews with project team
47. How effectively did the project management minimize UNEP's	Document review, interviews with	Sustainability guidelines (if available), procurement and

REVIEW QUESTIONS	METHODS	SOURCES OF INFORMATION
environmental footprint during implementation?	project staff, analysis of operational practices	travel records, interviews with project managers
Country ownership and driven-ness		
48. To what extent did government and public sector agencies demonstrate ownership and commitment to advancing the project from outputs to outcomes and towards intermediate states?	Document review, key informant interviews, stakeholder mapping and analysis	Government reports, meeting minutes, project progress reports, stakeholder engagement records, interviews with government officials and project team
49. How effectively did the project ensure inclusive ownership—engaging relevant institutions, sectors, and community representatives, including gendered and marginalized groups?	Document review, semi-structured interviews, trend harvesting	ProDoc, stakeholder engagement records, meeting minutes, interviews with representatives from multiple sectors and communities (as much as possible)
Communication and public awareness		
50. How successful was the project in knowledge management and in creating public awareness (learning exchange between/among project stakeholders and beneficiaries)? What were the main challenges and successes related to knowledge management and public awareness?	Document review, content analysis, semi-structured interviews, outcome mapping	Periodic reports, workshop reports, reports of public awareness activities undertaken, terminal reporting, interviews with project managers, stakeholders, and beneficiaries (where possible)

Annex III. STAKEHOLDERS CONSULTED DURING THE REVIEW

Organization	Position	Role in the project	Gender
UNEP	Task Manager	IA	M
UNEP	Senior Programme Assistant	IA	F
UNEP	Fund Management Officer	Financial oversight of the project	M
DEPP	Project Manager	EA	F
DEPP	Director	EA	F
DEPP	Accountant-	EA	F
DEPP	Research Team	Permitting System	F
DEPP	Research Team	Permitting System	F
DEPP	Environmental officer	Former project assistant	M
Office of the Prime Minister	Director of the Climate Change and Environmental Advisory Unit	Former Director DEPP	F
DMR	Acting Director of Marine Resources	Member Steering Committee	M
University of The Bahamas	Attorney	Legal Team	F
BNT	Director of Science and Policy	Key Stakeholder	F
BNT	Senior Science Officer	User Permitting System	F
Forestry Unit	Acting Director	Member Steering Committee	F
Perry Institute for Marine Science	Director	Key Stakeholder	M
	International IT Consultant -ABS	Development of the Permitting System	M
	International Legal Consultant - ABS	Legal Team	M
Maillis and Maillis, Attorney Pericles A. Maillis (<i>pro bono</i>)	Attorney	Legal Team	M

*Despite multiple attempts by the Task Manager, Project Manager, and Consultant to contact the following institutions: AOG, AMMC and BAMSI, it was not possible to establish communication and therefore the interviews could not be conducted.

ADDITIONAL NOTE: During the implementation of the ABS Project, the Department of Environmental Planning and Protection (DEPP) noted that no Indigenous Peoples (IP) groups or other directly marginalized groups were identified within the context of the project's execution. From a national perspective, conservation efforts and potential economic benefits are expected to contribute broadly to society through social programmes implemented by government institutions or private entities. The involvement of relevant government departments is considered to provide appropriate representation and safeguard the interests of the constituencies they are mandated to serve.

Annex IV. KEY DOCUMENTS CONSULTED

Project planning and reporting documents

- ABS Bahamas project_PCA package
- CEO Endorsement ABS Bahamas 1-29-2016
- Bahamas ABS_CEO Endorsement
- Periodic Progress Report period 1 – 32 (More in-depth review PPR 2019 – 2023)
- Periodic Expenditure Report period 1 – 32 (More in-depth review PPR 2019 – 2023)
- SIGNED_revised workplan
- Project Budget Revision 15 and others
- Audit Reports
- Signed Cofinance report template
- Workplan
- Final Workplan
- Final Financial Statement (signed)(GEF/GOV)
- APPROVED-Final Audit Reconciliation
- Audit report (signed) OR UNDP statement
- Final Cofinance Report (signed)
- Final project output - Main Document

Project outputs – Overall

- Final KAP Endline Survey Report - Bahamas ABS
- ABS 1 pager fact sheet
- Legislative institutional modalities and options for seeking PIC with local communities_UB
- Legal and Administrative Mandates for an Online Research Permitting System_UB

Project outputs Component 1: National Strategy on ABS and accession to the Nagoya Protocol

- Accession Manual
- ABS Benchmark Analysis_ Olivier Rukundo
- Briefing Note_Virtual Briefing Session with Senators and Parliamentarians
- FINAL DRAFT ABS Policy Statement Framework_UB
- ABS Stakeholder Assessment Final_UB

Project outputs Component 2: National Enabling environment for the implementation of the Nagoya Protocol

- ABS Act 2021 - Gazetted Copy
- FINAL DESK OFFICERS TRAINING MANUAL
- ABS - 18 month moratorium
- memo_18 mo moratorium
- Concept Note_Virtual Training on ABS Contract-2
- Report ABS Contract training
- ABS PIC MAT TEMPLATE

- SYSTEM REQUIREMENTS AND SPECIFICATIONS_ABS PERMITTING SYSTEM
- UB IRB Guidelines_UB

Project outputs Component 3: Applied ABS arrangements in The Bahamas

- FINAL Model Validation Analysis Report for A. elisabethae
- Management Plan for A. Elisabethae

Previous reviews/evaluations

- Final Inception Report-08JUN2021_ABS MTR
- Final Main MTR Report_ABS
- MID TERM REPORT. Final Inception Report-08JUN2021_ABS MTR

Reference documents

- Terms of Reference for the Terminal Review
- Nagoya Protocol on Access to Genetic Resources and the Fair and Equitable Sharing of Benefits Arising from their Utilization to the Convention on Biological Diversity – all resources at <https://www.cbd.int/abs>
- Access and Benefit-sharing Clearing-House (ABS Clearing-House, ABSCH) <https://www.cbd.int/abs/theabsch.shtml>
- Relevant concluded GEF-UNEP projects: GEF ID: 5774 Advancing the Nagoya Protocol in Countries of the Caribbean Region <https://www.thegef.org/projects-operations/projects/5774> GEF ID: 5172 Global Support for the Entry into Force of the Nagoya Protocol on Access and Benefit Sharing <https://www.thegef.org/projects-operations/projects/5172>
- UN Gender Methods Guidance
- UNEP Medium Term Strategy 2014 -2017
- UNEP Medium Term Strategy 2018 - 2021
- Medium Term Strategy 2022 – 2025. The United Nations Environment Programme strategy for tackling climate change, biodiversity, and nature loss, and pollution and waste from 2022 – 2025
- GEF: Guidelines on Core Indicators and Sub-Indicators, 2018
- UNEP environmental, social and sustainability framework (ESSF), 2020
- Sherman, K.; Dahlgren, C.; Dunn, C.; Claridge, D.; Higgs, N. Implementation of Access and Benefit Sharing in The Bahamas: A Precautionary Tale. Conservation 2025
- Neil Hartnell. Bahamas suffers massive losses on flawed natural resource regime. The Tribune, 2025

Annex V. REVIEW ITINERARY

The mission to Nassau, The Bahamas, took place between September 29 and October 3, 2025.

Weeks prior to the visit, the mission was coordinated mainly with Ces Colarina, Project Manager of the project, Christopher Cox, UNEP Task Manager, and Gloritzel Frangakis Cano, UNEP Senior Programme Assistant, to establish an efficient itinerary of visits and to be able to interview as many people as possible related to the project as possible.

The interviews were focused on the key stakeholders, many of which were members of the PSC since, according to the Project Manager, these were the people who participated most actively in the project's activities and who were aware of the project's performance.

The purpose of the visit to Nassau was to conduct interviews in person. However, on the days of the mission, The Bahamas was affected by Tropical Storm Imelda, which caused flooding in several areas and delayed the consultant's arrival by one day. As a result, mobility around Nassau was difficult and some of the planned interviews had to be conducted online. These circumstances were clearly beyond the control of the reviewer and those who assisted in organizing the visit.

The great cooperation of all the people interviewed, who openly and clearly shared their opinion on the project's development, was outstanding. They dedicated the necessary time to answering all the questions prepared by the reviewer and added information according to each of their experiences. The information gathered during the visit was enriching and essential for the preparation of the final report.

It is also worth noting that, despite efforts to contact certain individuals from institutions that were part of the Steering Committee, it was not possible to reach them for various reasons. The main one was that the project concluded two years ago and several of the people involved were no longer affiliated with the institutions; some had retired, one had sadly passed away, and others were no longer engaged with the topic and—due to their current professional commitments—it was not possible to secure an interview during the field mission. Some of these institutions include OAG, AMMC, and BAMSI. Efforts to reach them continued even after the in-country mission. The Task Manager, with the support of the DEPP Director, the Project Manager, and the consultant, made multiple attempts to establish contact, but this was ultimately not possible. It is worth mentioning that the OAG, through its representative, subsequently responded to the report's contents. Although the contributions of the institutions that could not be contacted would undoubtedly have enriched the analysis with additional perspectives, the consultant considers that the information gathered through the other interviews, together with the review materials available and the subsequent input received from the OAG, was sufficient to compile the evidence needed to prepare the final report for this Terminal Review.

During the mission to Nassau, I had the opportunity to interview several key stakeholders involved in the project, representing government institutions, private organizations, and research institutes. Many of these entities were members of the Project Steering Committee, including the following:

- Department of Environmental Planning and Protection (DEPP)
- Bahamas National Trust (BNT)
- Department of Marine Resources (DMR)
- Maillis and Maillis, Attorney Pericles A. Maillis and other associate attorneys (*pro bono*)
- Forestry Unit
- Perry Institute for Marine Science

Annex VI. ENVIRONMENTAL AND SOCIAL SAFEGUARDS ASSESSMENT

ESS PLANNING AT PROJECT DESIGN

List any ESS issues identified at project design (e.g., SS 1.7, SS 2.3, etc.) ²⁶	SS1.7 – Biodiversity, Ecosystems and Sustainable Natural Resource Management: Collection and utilization of genetic resources? This ESS was considered within the context of Biodiversity Conservation: Use of biological resources and genetic material. SS5.3 – Cultural Heritage: Utilization of Cultural Heritage for commercial or other purposes (e.g., use of objects, practices, traditional knowledge, tourism)? This ESS was considered within the context of possible use of traditional knowledge associated with genetic resources. SS8.1 – Labor and working conditions: unequal working opportunities and conditions for women and men. This ESS was considered within the context of Gender Equality: Ensuring equitable participation of women in ABS-related processes; and Stakeholder Engagement: Inclusion of all relevant institutions and local actors in consultations.
For any ESS issues identified at project design, were <u>mitigation strategies</u> developed (Y/N)? (If yes, briefly describe)	Yes. Mitigation strategies included: adherence to national and international ABS frameworks (Nagoya Protocol); participative consultations were attempted to ensure transparency and integration of the gender perspective in stakeholder participation.
Were any <u>gaps</u> in ESS issues identified at the review inception phase (Y/N)? (If yes, briefly describe)	Yes. Limited representation of local actors.

ESS MONITORING AT PROJECT IMPLEMENTATION

Is there evidence that the potential emergence of ESS issues was actively <u>monitored</u> during project implementation (Y/N)? ²⁷ (If yes, briefly describe)	Yes. Evidence includes stakeholder meeting records, consultation reports, and gender participation tracking in national ABS workshops and policy processes.
Is there a justification for the absence of ESS monitoring (Y/N)? (If yes, briefly describe) ²⁸	N/A. ESS monitoring was proportionate to the low environmental and social risk nature of the project.

MANAGEMENT RESPONSIVENESS DURING PROJECT IMPLEMENTATION

²⁶ Select from the list of Environmental and Social Safeguards Risks in Table 1 of the template (tool 14, Safeguards Assessment Template).

²⁷ **Low risk:** Negative impacts minimal or negligible: no further study or impact management required.

Moderate risk: Potential negative impacts, but limited in scale, not unprecedented or irreversible and generally limited to programme/project area; impacts amenable to management using standard mitigation measures; limited environmental or social analysis may be required to develop an Environmental and Social Management Plan (ESMP). Straightforward application of good practice may be sufficient without additional study.

High risk: Potential for significant negative impacts (e.g. irreversible, unprecedented, cumulative, significant stakeholder concerns); Environmental and Social Impact Assessment (ESIA) (or Strategic Environmental and Social Assessment (SESA)) including a full impact assessment may be required, followed by an effective comprehensive safeguard management plan.

²⁸ For instance, during COVID, access to the field may have been restricted

Identify the ESS issues/events triggered²⁹ by the project.³⁰	No ESS were identified that were triggered during the implementation of the project. Minor delays in stakeholder engagement due to institutional changes and limited awareness among local actors.
Describe consequences of ESS issues/events during project implementation.	Temporary gaps in coordination and participation, which could have limited input from certain stakeholders at key decision points.
Describe the management response and identify supporting documentation.^{31, 32}	The Project Manager made efforts to ensure the participation of key stakeholders in meetings and workshops organized by the project to seek input from all interested parties. Evidence includes meeting reports, attendance lists, and information from some specific PIRs.
Were negative ESS effects offset by management response (Y/N)? (If yes, briefly describe)	There were no negative effects of the ESS per se in this project. As mentioned above, efforts were made to enhance participation and awareness among key institutions, and some limited actions were undertaken, such as campaigns to inform local stakeholders about the project. However, this aspect could have been further developed.

²⁹ 'Triggered' refers to environmental or social issues/events that are caused or exacerbated—directly or indirectly—as a result of the project's activities, interventions, or presence.

³⁰ Select from the list of Environmental and Social Safeguards Risks in Table 1 of the template (tool 14, Safeguards Assessment Template).

³¹ For most low-moderate risk projects, good practice approach may be sufficient. Project should demonstrate safeguard management approach in the project activities, budget, risks management, stakeholder engagement or/and monitoring segments of the project document to avoid or minimize the identified potential risks without preparing a separate safeguard management plan.

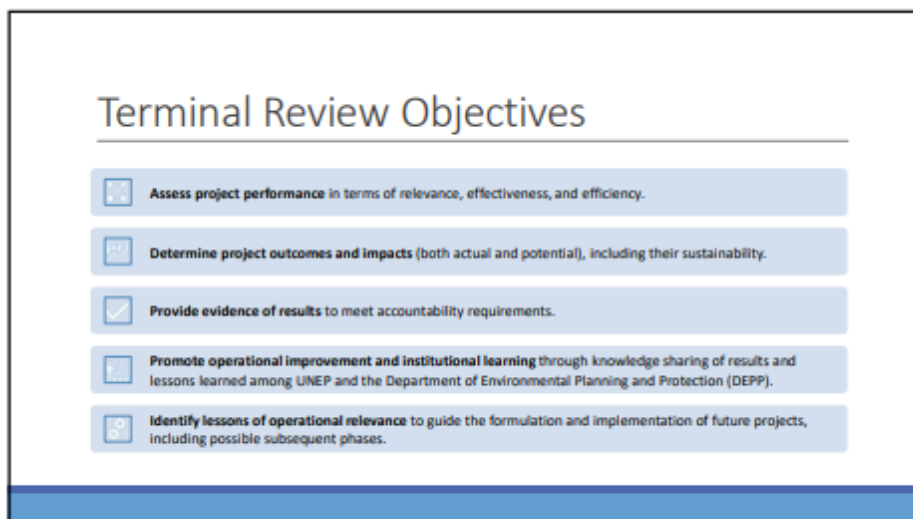
³² E.g., GEF Project Implementation Report (PIR), Progress Report, Minutes, etc.

Annex VII. COMMUNICATION AND OUTREACH TOOLS

On September 18, 2025, a virtual meeting was organized by the consultant, with the support of the Task Manager and the Project Manager, to engage key stakeholders who participated in the project. The purpose of this meeting was to reconnect with these stakeholders and remind them of the project, which had concluded two years earlier, while also providing a refresher on its main components, outcomes, and outputs. The meeting also provided an opportunity to gather their initial impressions of the project and to invite them to participate in interviews during the consultant's mission to Nassau. The response was positive, with 15 participants attending. The PowerPoint presentation used during the meeting is shared below.



1



2

Data Collection Tools

- Collection and analysis of information from various sources to achieve a comprehensive review of the project.
- Mainly:
 - Review of project documents which are available to the consultant.
 - Virtual interviews and in-person interviews during the visit to The Bahamas are a central element of the review and a key tool for data collection, particularly qualitative data.

3

Data Collection Tools (documents)

The following are some of the main documents analyzed for the elaboration of the Terminal Review Report:

- Project Document
- Mid-Term Review
- Workplans
- Project Terminal report
- Periodic Progress Report (2016 to 2023)
- Periodic Expenditure Reports
- FINAL DRAFT ABS Policy Statement Framework_UB
- ABS Act
- ABS Permitting Manual

Documents pertinent to the Terminal Review found in the Anubis under the sections of Initial Documents, Technical Documents, Other Documents, Terminal Documents, and Periodic Documents will be reviewed and analyzed according to the specific needs of the review.

4

Data Collection Tools (interviews)

Interviews were carried out primarily with ABS stakeholders:

- | | |
|--|--|
| • Department of Environmental Planning and Protection (DEPP) | • Bahamas National Trust (BNT) |
| • Department of Legal Affairs - Office of the Attorney General (OAG) | • Customs Department |
| • Office of the Prime Minister | • Private Law Office |
| • The Antiquities, Monuments and Museum Corporation (AMMC) | • Forestry Unit |
| • Department of Marine Resources (DMR) | • Perry Institute for Marine Science |
| • University of the Bahamas (UB) | • Bahamas Agriculture and Marine Science Institute |
| | • Ministry of Foreign Affairs |

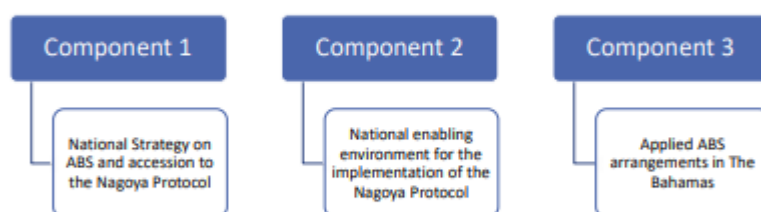
5

Main considerations for the terminal review

1. **Relevance:** political and social context and relevance of ABS for The Bahamas.
2. **Efficiency:** management of project execution: contracting, planning, and disbursements.
3. **Effectiveness:** knowledge of the project and the ABS regime in general; importance of the topic for The Bahamas in planning activities within the institutions, capacity building activities.
4. **Sustainability:** continuity of ABS activities in the Bahamas

6

Project Components



7

Outcomes and outputs

Component 1:	
Outcome	Outputs
National Strategy and Accession to the Nagoya Protocol	- Access and Benefit Sharing Strategy for The Bahamas developed in a consultative process - Awareness among decision and lawmakers on opportunities of the Nagoya Protocol is raised - Legal documents needed for ratification/ accession are drafted
Component 2:	
Outcome	Output
Increased understanding of the national benefits to be accrued through ABS	Consultations and public awareness campaigns with relevant stakeholders
Outcome	Output
National ABS legal framework adopted	Policy, legal, and regulatory frameworks governing ABS drafted and submitted for approval

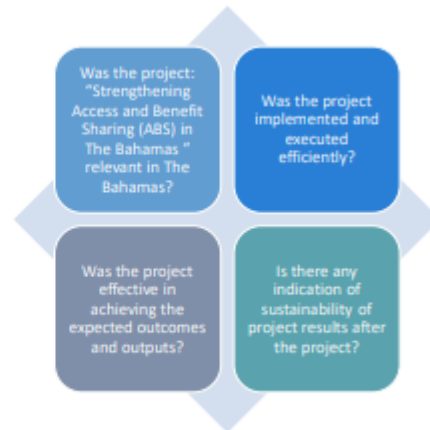
8

Outcomes and outputs

Component 2 (continued):	
Outcome	Outputs
Strengthened national institutional capacity for implementation of the national ABS framework	- Online administrative procedures for ABS agreements—including Prior Informed Consent (PIC), Mutually Agreed Terms (MAT), and Benefit-Sharing—are approved and operational. A monitoring system for research and bioprospecting permits, as well as ABS agreements, have been developed and implemented. - Capacity built within the competent authorities to initiate and negotiate contracts/agreements.
Component 3:	
Outcome	Outputs
ABS principles applied to revised commercial and non-commercial research permit	- Development of a population model for <i>Antillogorgia elisabethae</i> in The Bahamas - Pilot 2. Adjusted partnerships with ex situ collections take up ABS policies - Pilot 3. ABS agreement integrates monitoring system for BD and sustainable use

9

Some aspects we would like to discuss



10

Lessons learned: Key Reflections

- Which aspects can be replicated?
- What opportunities for improvement have emerged?
- What unexpected results or challenges were observed?
- Which factors contributed most to success?
- What barriers limited progress and how can they be addressed?
- How can sustainability of results be ensured?
- What partnerships, approaches, or practices proved most valuable?
- What should be done differently in future projects or phases?

11

Recommendations – Moving forward	What recommendations do you propose, are any of these suggestions agreeable? <i>Strengthen capacity building:</i> ensure continuous training and knowledge transfer. <i>Enhance stakeholder engagement:</i> deepen collaboration with communities, private sector, and government agencies. <i>Promote sustainability:</i> integrate financial, institutional, and policy mechanisms to secure long-term impact.
---	---

12

Recommendations – Moving forward	What recommendations do you propose, are any of these suggestions agreeable? <i>Improve communication and awareness:</i> make ABS principles more accessible to diverse audiences. <i>Leverage partnerships:</i> connect with regional and international initiatives for greater synergies. <i>Plan for scalability:</i> design strategies that allow successful experiences to be replicated in other contexts.
---	---

13

	Thanks for your attention!
--	---

14

Annex VIII. BRIEF CV OF THE REVIEWER

Name	Maria de Lourdes Torres
Profession	Molecular Biologist, Professor/Researcher/Consultant
Nationality	Ecuador
Country experience	Americas: Ecuador, Colombia, Peru, Uruguay, Brazil, Venezuela, Paraguay, Chile, Argentina, Panama, El Salvador, Nicaragua, Honduras, México, and Guatemala.
Education	PhD in Plant Molecular Biology

Short biography

María de Lourdes Torres completed her PhD studies in Plant Molecular Biology at the Freie Universität Berlin (Germany). She is a professor at the College of Biological and Environmental Sciences (COCIBA), Universidad San Francisco de Quito (Ecuador). She is Vice-Dean of the COCIBA, Coordinator of the Biotechnology Area and Director of the Plant Biotechnology Lab. She directs and takes part in research projects mainly related to in vitro culture and molecular characterization, using molecular and genomic markers of plant species of interest to Ecuador. She also maintains collaborations with national and international researchers in projects involving genetic analysis of animal species and bacterial consortia. She has experience in policy development on access to genetic resources and biosafety in relation to the use and management of genetically modified organisms and modern biotechnology.

Key specialties and capabilities cover

- Expertise in molecular biology and plant biotechnology.
- Knowledge of bioinformatics and genomic data analysis.
- Familiarity with biodiversity, access and benefit-sharing (ABS) frameworks, and biosafety regulations.
- Experience in project evaluation, knowledge management, and stakeholder engagement in scientific projects.
- Ability to assess scientific methodologies, data quality, and research impact.

Current appointments:

Member of the AHTEG on Risk Assessment. Cartagena Protocol on Biosafety – Convention on Biological Diversity

Adjunct Professor. Biology Department, University of North Carolina at Chapel Hill (United States)

Advisory Board Member. Galapagos Science Center (USFQ - UNC)

Advisory Board Member. World Wildlife Fund (WWF, Ecuador)

Biosafety and Biotechnology

For more than 20 years, Ms. Torres has worked in the field of biosafety at national and regional levels in Latin America and been a consultant for the elaboration of policies on biosafety, regulations on Living Modified Organisms (LMO), genetic resources, and laws on food sovereignty, among others. She was the official delegate of Ecuador to several COP-MOPs of the Cartagena Protocol on Biosafety (CPB) and was also the official delegate of

Ecuador during the whole Nagoya - Kuala Lumpur Supplementary Protocol on Liability and Redress negotiation process. She was a regional advisor for the BCH-CPB training projects, and as such has organized and delivered workshops in most Latin American countries. Ms. Torres has been part of the AHTEG on Synthetic Biology of the Convention on Biological Diversity (CBD) and is currently a member of the AHTEG on Risk Assessment of the CPB. She is an advisor to Ecuador on biosafety and access to genetic resources, mainly to the Ministries of Environment and Agriculture.

Selected assignments and experiences

- Consultant for Terminal Reviews of biosafety-related projects (e.g., in Panama and Guatemala) and for ABS projects (e.g., in The Bahamas).
- Official delegate to CBD meetings under the Cartagena Protocol, and to working groups on synthetic biology, risk assessment, and access and benefit-sharing (ABS).
- Author of over 70 scientific papers on biodiversity, using molecular approaches to study evolutionary and population aspects applied to conservation.

ANNEX IX. GEF PORTAL INPUTS (FOR GEF FUNDED PROJECTS)

The following table contains text to be uploaded to the GEF Portal. **It will be drawn from the Review Report, either as copied or summarized text.** In each case, references should be provided for the paragraphs and pages of the report from which the responses have been copied or summarized.

Table 19. GEF portal inputs

Question: What was the performance at the project's completion against Core Indicator Targets? (For projects approved prior to GEF-7³³, these indicators will be identified retrospectively and comments on performance provided³⁴).
Response: <i>(Review Report Tables 5 and 9).</i> Since the project was developed under GEF-5, no GEF Core Indicator targets were defined at CEO endorsement. For the purpose of this Terminal Review, the reviewer retrospectively assessed the project's performance against relevant GEF-7 Core Indicators based on the nature of project interventions. Given its focus on legal and institutional strengthening for Access and Benefit Sharing (ABS), the majority of GEF-7 Core Indicators—particularly those related to protected areas, restoration, fisheries, shared water ecosystems, greenhouse gas emissions, and chemicals management—are not applicable to this project. However, Core Indicator 11 (Number of direct beneficiaries disaggregated by gender) is relevant. While the project did not set quantitative beneficiary targets, participation records confirm direct engagement with government institutions, academic and research stakeholders, and system users. Notably, women held leadership and technical positions across key implementing and decision-making bodies, although this resulted from existing institutional structures rather than from an explicit gender strategy within the project. In summary, the project contributes qualitatively to Core Indicator 11, demonstrating inclusive participation in institutional processes, but does not contribute directly to other GEF-7 core indicators, as the project did not involve field-based conservation, emissions reduction, or chemicals management interventions. Performance against indicator CI-11 is therefore assessed descriptively rather than quantitatively.
Question: What were the progress, challenges, and outcomes regarding engagement of stakeholders in the project/program as evolved from the time of the MTR? <i>(This should be based on the description included in the Stakeholder Engagement Plan or equivalent documentation submitted at CEO Endorsement/Approval)</i>
Response: <i>(Review Report paragraphs 33-37; 123-124)</i> Stakeholder engagement prior to the Mid-Term Review (MTR) was already strong among core governmental institutions, especially those involved in drafting and advancing the ABS Act. The MTR acknowledged this progress and emphasized that the long-term impact of the project would depend on the extent to which the ABS framework became internalized by regulators, resource managers,

³³ The GEF is currently operating under the seventh replenishment period of the GEF Trust Fund covering the period July 1, 2018 to June 30, 2022. The GEF Portal Reporting Guide for FY20 Reporting Process indicates that GEF-6 projects that have yet to map existing indicators to GEF-7 Core Indicators need to do so at MTR stage or (if already there) at the time of the TE. (i.e. not GEF projects approved before GEF-6)

³⁴ This is not applicable for Enabling Activities

users, and other beneficiaries. Following the MTR, institutional engagement continued, and initial awareness efforts aimed to inform broader audiences about the ABS system. However, while these efforts helped reinforce institutional understanding, they did not translate into substantial expansion of participation across stakeholder groups.

The KAP (Knowledge, Attitudes, and Practices) endline survey conducted in 2023 confirmed that broader awareness and understanding of ABS did not significantly increase after the MTR. Although stakeholders reported familiarity with the concept of ABS, attitudes and comfort with its application under the ABS Act remained mixed. Researchers expressed concerns about procedural clarity and the perception that the permitting system may discourage scientific collaboration, while community-level engagement remained limited and traditional knowledge considerations were not fully integrated. Overall, stakeholder engagement was consistent and effective at the institutional level but did not evolve toward a wider, sustained participation among academic, community, and resource-user groups, which will be necessary to support long-term operationalization of the ABS regime.

Question: What were the completed gender-responsive measures and, if applicable, actual gender result areas? *(This should be based on the documentation at CEO Endorsement/Approval, including gender-sensitive indicators contained in the project results framework or gender action plan or equivalent)*

Response: [\(Review Report paragraphs 37,71,83,111,113,125-126,137; Table 7\)](#)

The project did not include a gender action plan nor gender-specific indicators in its results framework at CEO endorsement, and therefore gender was not monitored as a distinct outcome area during implementation. Gender considerations were also not embedded as explicit outputs or monitoring targets. As a result, no gender-disaggregated monitoring was conducted, and gender outcomes were not systematically measured or reported

In practice, women held several key roles in the development and coordination of the ABS framework, including in legal drafting, research permitting functions, and participation in the Steering Committee and ABS Committee. Their presence contributed to representation in decision-making spaces, though this reflected existing institutional staffing structures rather than project-driven gender mainstreaming.

While local communities and women participated in some awareness activities and workshops, this engagement was not sustained or structured in a way that promoted direct involvement in decision-making or implementation processes. As a result, the project did not generate specific gender-responsive outcomes or evidence of changes in gender roles, access, or benefits. Going forward, deeper engagement with community actors, including women's groups, will be important to ensure that benefit-sharing arrangements are grounded in equitable participation and reflect diverse stakeholder perspectives.

According to the reconstructed Theory of Change, considerations related to human rights and gender equality were included as an underlying assumption, given that the project did not include explicit gender-responsive measures at design. The assumption stated that relevant government institutions and local partners would ensure balanced and inclusive participation of women, person with disabilities and community actors in ABS-related consultations and capacity-building efforts. While institutional-level participation of women was strong, sustained engagement with local communities and a gender-responsive outreach were not systematically planned or operationalized and therefore remained limited during implementation.

Question: What was the progress made in the implementation of the management measures against the Safeguards Plan submitted at CEO Approval? The risk classifications reported in the latest PIR report should be verified and the findings of the effectiveness of any measures or lessons learned taken to address identified risks assessed. *(Any supporting documents gathered by the Consultant during this review should be shared with the Task Manager for uploading in the GEF Portal)*

Response: [\(Review Report paragraphs 81, 127-128; Annex VI\)](#)

The project was classified as low in environmental and social risk at CEO Approval. The Safeguards Plan primarily emphasized ensuring transparent consultation processes, compliance with national legislation, and the absence of activities with direct environmental impact. Throughout implementation, the project-maintained adherence to UNEP safeguard requirements. Policy drafting, regulatory development, and institutional coordination were conducted through formal consultation mechanisms, and no safeguard-related grievances were reported. PIRs consistently rated safeguard risks as low, and this assessment remains appropriate based on the evidence reviewed.

Although the project involved awareness and capacity-building activities, engagement with community-level stakeholders and traditional knowledge holders was limited and not structured as a safeguard measure. Participation was high among government and institutional actors, including consistent representation of women in leadership and technical roles. However, there were no specific actions or monitoring indicators to ensure equitable participation of local communities or other non-governmental groups. The lesson moving forward is the importance of explicitly planning and monitoring community engagement and social inclusion measures even in low-risk ABS governance projects, to ensure that safeguards principles are translated into practice during system operationalization.

Question: What were the challenges and outcomes regarding the project's completed Knowledge Management Approach, including: Knowledge and Learning Deliverables (e.g., website/platform development); Knowledge Products/Events; Communication Strategy; Lessons Learned and Good Practice; Adaptive Management Actions? *(This should be based on the documentation approved at CEO Endorsement/Approval)*

Response: [\(Review Report paragraphs 121-122; 129-130; 131-132\)](#)

The project's Knowledge Management approach centered on generating the institutional and procedural foundations required to operationalize the ABS regime. One of the most significant knowledge outputs was the development of the first global online ABS permitting system which provides a structured platform for submitting, reviewing, and authorizing access requests for genetic resources. The establishment of this system represents a major innovation in ABS governance globally and positions The Bahamas as a pioneer in digital ABS administration. In parallel, the adoption of the ABS Act and associated procedures constitute essential institutional knowledge assets that now shape how ABS is interpreted and implemented nationally.

Initial awareness and information-sharing efforts included consultations, training sessions with institutional stakeholders, and public communication activities to introduce key ABS concepts and the new legal obligations. However, these efforts did not translate into sustained, broad-based knowledge dissemination among researchers, user groups, and local communities. Findings from the KAP surveys and stakeholder interviews indicate that understanding of the ABS Act and the permitting procedures remains uneven. While the permitting system is in place, its full potential has not yet been realized due to ongoing technical issues with the platform and limited communication of the system's procedures to users. This highlights the need for accessible guidance materials and more continuous outreach.

From an adaptive management perspective, the project adjusted effectively to operational disruptions—particularly during the COVID-19 pandemic—by shifting interactions to virtual formats and maintaining progress on core outputs. Nonetheless, the experience of operationalizing the online permitting system demonstrates that technological innovation must be accompanied by ongoing user support, iterative feedback mechanisms, and responsive system adjustments. A key lesson learned is that knowledge management in ABS governance requires more than producing legal and procedural tools—it also requires structured, continuous engagement with system users to ensure that the permitting platform is understandable, trusted, and functional for researchers, institutions, and communities alike.

Question: What are the main findings of the evaluation?

Response: ([Review Report paragraphs 5 - 6](#))

The project demonstrated strong performance in establishing the legal and institutional foundations for ABS in The Bahamas, notably through the accession to the Nagoya Protocol, adoption of the ABS Act, and development of the online permitting system. These achievements reflect solid national ownership and effective coordination among key government institutions during the core phases of legal drafting. The project also contributed to increased institutional awareness of ABS principles and initiated scientific work to support evidence-based decision-making. However, several areas would have benefited from further attention, particularly the sustained engagement of academic researchers and community actors during the operationalization phase, the expansion and continuity of awareness activities across sectors, and the technical maintenance and practical usability of the online permitting system. Strengthening these elements will be essential for achieving full and lasting operationalization of ABS in practice.

The Terminal Review identified the following set of findings that reflect the project's achievements, operational experience, and areas that may require continued attention to support the long-term implementation of the ABS framework in The Bahamas. These findings provide insight into the project's relevance, effectiveness, efficiency, sustainability, stakeholder engagement, gender considerations, safeguards, and institutional performance.

- The project was aligned with UNEP's strategic priorities, GEF objectives, and national biodiversity governance needs, directly supporting the implementation of the Nagoya Protocol.
- The project contributed to regional knowledge exchange and complemented ongoing ABS efforts in the Caribbean.
- The project successfully established the national ABS framework, including accession to the Nagoya Protocol, approval of the ABS Act, and the development of the online permitting system.
- Institutional capacities for ABS administration were strengthened, particularly within the authority responsible for permit oversight; however, communication with researchers and academic institutions was not sufficiently sustained, affecting clarity and acceptance of procedures.
- Awareness of ABS concepts increased at the institutional level, but continued capacity building and broader stakeholder engagement are necessary for full operationalization of the ABS system.
- The project complied with UNEP's financial standards, with no cases of mismanagement or irregularities observed.
- Financial documentation and reporting were complete and well-structured, enabling effective oversight and adaptive financial management.
- The project experienced delays and required two no-cost extensions; however, core outputs were completed within the approved budget.

- Project coordination adapted effectively to administrative changes and COVID-19 related disruptions, maintaining progress toward key outcomes.
- Monitoring and reporting processes operated consistently and enabled timely adjustments during implementation. However, they largely concentrated on tracking activities and outputs, with limited emphasis on assessing whether and how the ABS framework was beginning to be applied in practice.
- Women were well-represented in institutional and decision-making roles, though this reflected existing staffing rather than a deliberate gender mainstreaming approach; engagement with community-level actors was limited.
- Political ownership of the ABS framework is strong; however, coordination among ABS institutions has weakened since project closure.
- The ABS permitting system requires ongoing IT support and dedicated staffing to ensure functionality, user access, and continuity.
- The legal and institutional framework for ABS is in place but sustained inter-agency coordination will be necessary to translate it into a fully operational regime.
- Project management effectively coordinated inputs and maintained momentum despite administrative challenges and the COVID-19 pandemic.
- Government institutions, primarily through the Steering Committee and technical working teams, maintained consistent engagement during implementation. In contrast, participation from academic researchers and community stakeholders was more limited and irregular, reducing opportunities for broader dialogue and meaningful involvement.
- Women's leadership in ABS processes was notable, but this reflected existing institutional structures rather than a specific project strategy. Engagement with marginalized or community groups was not systematically integrated.
- The project had a low environmental and social risk profile, and no safeguard-related concerns emerged during implementation.

Annex X: IMPLEMENTATION PLAN OF RECOMMENDATIONS

Project Title and Reference No.: "Strengthening Access and Benefit Sharing (ABS) in The Bahamas". GEF ID 5744 / SMA ID 28965

Contact Person (TM/PM): Christopher Cox, Tax Manager - UNEP

RECOMMENDATIONS	PLANS			
	ACCEPTED (YES/NO/ PARTIALLY)	WHAT WILL BE DONE?	EXPECTED COMPLETION DATE	REONSIBLE OFFICER/ UNIT/ DIVISION/ AGENCY
It is recommended that DEPP address the technical issues of the ABS online permitting system and provide clear guidance to system users, including introducing a streamlined permit renewal process that avoids requiring new applications for ongoing or multi-year research activities, as a matter of immediate priority.	Yes	1. Review challenges of the ABS online permitting platform in consultation with internal permitting management personnel; incorporate inputs from clients/other users.	Immediate	Director, DEPP
		2. Reassess internal capacity to manage and maintain the system and define required measures to be implemented.	Immediate	
		3. Update as appropriate all operation and management processes for the ABS online permitting platform with clear guidance to system users and make widely available	Within 6 months	
		4. Assure financial budget to operate and maintain the system; the revenue from the permitting fees should be directed to support operation and maintenance.	Within 6 months	
		5. Ensure a routine client feedback and evaluation mechanism is put in place	Within 6 months	
		6. Continue to maintain contact with OneWorld Analytics (as the permitting system developer) for consultation and guidance given their continued close work on related projects.	Over next 12 months and as needed	

RECOMMENDATIONS	PLANS			
	ACCEPTED (YES/NO/ PARTIALLY)	WHAT WILL BE DONE?	EXPECTED COMPLETION DATE	RESPONSIBLE OFFICER/ UNIT/ DIVISION/ AGENCY
It is recommended that DEPP reconvene the ABS Committee—as mandated by national ABS legislation—to assess the actions needed to sustain the project’s achievements, review the permitting system requirements, and introduce improvements that address the concerns raised by the research sector while strengthening inclusion, communication, and consideration of gender and human rights dimensions in engagement with local communities. In doing so, the Committee should take into account essential personnel turnover within the component agencies, and ensure that routine capacity-building measures are regularly implemented. Reactivating regular Committee meetings will be essential to support the continued implementation of the ABS framework.	Yes	1. Establish a routine meeting schedule for the ABS Committee with updated mandate/TOR to guide the work of the Committee as relevant. Emphasis on: - Tracking the efficacy of the ABS Permitting System, routine evaluation of risks and challenges with means to quickly address - Ensuring routine communications and information dissemination to users, stakeholders - Overall committee coordination and agency role review	Immediate	Director, DEPP
		2. Definition of an institutionalized capacity building programme with routine assessment of gaps and means to address; emphasis on personnel turnover	Within 6 months	
UNEP is encouraged to consider using the ABS experience in The Bahamas—the first country globally	Yes	1. Seek/facilitate interest of the DEPP in showcasing the results and experiences of the project at the regional and global level.	Immediate	GEF Task Manager, UNEP

RECOMMENDATIONS	PLANS			
	ACCEPTED (YES/NO/ PARTIALLY)	WHAT WILL BE DONE?	EXPECTED COMPLETION DATE	RESPONSIBLE OFFICER/ UNIT/ DIVISION/ AGENCY
to develop and operationalize an online ABS permitting system—as a reference case in regional knowledge-sharing and capacity-building efforts, including ongoing initiatives such as the GEF ABS Project in Saint Lucia (Project 10840). Highlighting the legal and institutional achievements, as well as the lessons learned during the system's operationalization, can support peer learning and provide a practical example for countries in the Caribbean and Latin America that are in the process of establishing or strengthening their ABS systems and digital access procedures. This experience offers a concrete and scalable model that could inform future ABS project design and implementation under the UNEP–GEF portfolio.		2. Share results of the Terminal Review to lead project proponents and the Executing Agency, IUCN of the GEF ABS Project in Saint Lucia (Project 10840).	Immediate	
		3. Share with the CARICOM and OECS Secretariat who are supporting Caribbean countries in advancing ABS agendas under their NBSAPs in line with the Global Biodiversity Framework	Immediate	
		4. Share the evaluation findings with UNEP's Law Division to solicit pertinent advisory support for The Bahamas in moving forward, and also for Saint Lucia in implementation of Project 10840. Consult with the CBD Secretariat in terms of guidance and/or parallel support that may be available.	Within 3 months	
		5. Foster direct technical exchanges between the DEPP and the ABS Committee of The Bahamas and the Saint Lucia project proponents. A study tour mission by the Saint Lucia team to The Bahamas may be considered to learn first-hand of critical management considerations.	Within 6 to 12 months	

Annex XI. QUALITY ASSESSMENT OF THE REVIEW REPORT

Review Title: Terminal Review of the UNEP/GEF Project "Strengthening Access and Benefit Sharing (ABS)" (GEF ID 5744 / SMA ID 28965)2016 – 2023

Consultant: Maria de Lourdes Torres

All UNEP Reviews are subject to a quality assessment by the UNEP Evaluation Office. This is an assessment of the quality of the review product (i.e. Main Review Report).

Report Quality Criteria	UNEP Evaluation Office Comments	Final Report Rating
Section A: Executive Summary	Assessment	
1. Does the Executive Summary act as a concise, accurate standalone section, especially to inform decision-making? Consider how clearly and concisely the report presents: - a clear summary of the review object - review objectives, scope and methodology - the overall project review rating - a summary of main review findings, including key features of performance (strengths and weaknesses) - summary responses to key strategic review questions - summary of main conclusions, lessons learned and recommendations	<u>Coverage/omissions:</u> The Executive Summary is well written and covers all the required elements. A summary response to the key strategic review questions is also provided. <u>Strengths/weaknesses:</u> The Executive Summary presents a comprehensive summary of the main findings based on the assessment of the review criteria.	6
Section B: The Project	Assessment	
2. Does the report clearly describe the key parameters, scale and complexity of the evaluand? Consider how well the report presents: - an overview of the main issue that the project is trying to address - timeline, including dates of project approval, duration and number of phases (where appropriate) - geographic coverage (regions/countries) - total secured budget and project financing, including a table with funding sources - implementing and funding partners - institutional context (i.e. UNEP sub-programme, Division, Branch etc) - implementation structure with diagram - UNEP results frameworks to which it contributes (e.g. PoW Direct Outcome) - summary of results framework as stated in the ProDoc (or as officially revised) - stakeholder groups organised according to relevant common characteristics - whether the project has been evaluated in the past (e.g. mid-term, by an external agency, etc.) - substantive or significant changes in design during implementation	<u>Coverage/omissions:</u> All required elements are adequately addressed. <u>Strengths/weaknesses:</u> The report presents a comprehensive introduction and description of the evaluand.	5.5
Section C: Review Methods and Theory of Change	Assessment	

Report Quality Criteria	UNEP Evaluation Office Comments	Final Report Rating
3. Does the report present a clear, comprehensive and adequate description of the review methodology? Consider how well it presents the following elements, and their adequacy based on the scope of the review: • statement of the purpose of the review and the key intended audience for the review findings • data collection methods and information sources • justification for methods used (e.g. electronic/face-to-face interviews, qualitative/quantitative analysis) • criteria and sampling strategies used to select stakeholders for consultations, and for sites/countries visited • number and types of respondents (including in a table broken down by gender) • strategies used to increase stakeholder engagement and response rate • methods used to include the voices/experiences of different and potentially excluded groups (e.g. women, marginalised) • data verification methods (e.g. triangulation) • data analysis methods (e.g. scoring, thematic analysis) • review limitations and mitigation measures (e.g. how these were addressed by the evaluator) • consideration for ethics and human rights issues, including how anonymity and confidentiality were protected	<u>Coverage/omissions:</u> Elements are well addressed. A table summarizing the respondents interviewed during the data collection phase is also included. <u>Strengths/weaknesses:</u> The section presents a comprehensive description of the review methods. Limitations are also explained.	6
4. Does the report describe an assessment and reformulation of the Theory of Change, and present an adequate articulation of the TOC causal pathways that were used to assess project performance (narratively and diagrammatically)? Consider how well the report presents: • whether the project design included a TOC • how the TOC at review³⁵ was designed (e.g. who was involved, etc) • confirmation/reconstruction of results in accordance with UNEP definitions (including reformulation table, which may have initially been presented in the Inception Report and should appear in the Main Review report.) • articulation of causal pathways • identification of drivers and assumptions • identification of key actors in the change process	<u>Coverage/omissions:</u> The reviewer reconstructed the ToC at Review and reformulated some of the results statements. <u>Strengths/weaknesses:</u> The reconstructed ToC at Review is presented both in a diagrammatic and narrative form. An Assumption related to human rights and gender equality was also identified. The section well articulates the causal pathways explaining also the roles of different stakeholders in the change process. However, the Evaluation Office notes that some of the originally approved outcome statements represent results at the output level and,	3

³⁵ During the Inception Phase of the review process a *TOC at review Inception* is created based on the information contained in the approved project documents (these may include either logical framework or a TOC or narrative descriptions), formal revisions and annual reports etc. During the review process this TOC is revised based on changes made during project intervention and becomes the *TOC at review*.

Report Quality Criteria	UNEP Evaluation Office Comments	Final Report Rating
	therefore, should have been reformulated during the Terminal Review. As indicated in the 01 UNEP Glossary of results definitions December 2023.pdf, an outcome is defined as “a change at institutional level, or changes in behaviors, attitudes or conditions achieved from the use (i.e., uptake, adoption, application) of outputs by intended beneficiaries”. However, the following outcomes refer to strengthening and building the capacity of national institutions, which, instead, represent output level results: • Outcome 2.1: Increased understanding of the national benefits to be accrued through ABS • Outcome 2.3: Strengthened national institutional capacity for implementation of the national ABS framework Lastly, the reconstructed ToC at Review lacks an Impact (“Impacts are long-lasting results arising, directly or indirectly from a project. Impacts are intended and positive changes and must relate to UNEP’s Mandate”, UNEP Glossary of Results), whereas it presents a Goal and Strategic Objective, which are not considered project results at UNEP.	
Section D: Evidence and Analysis	Assessment	
5. Is the report based on sufficient and adequate data and clear and credible evidence? Consider how well the report presents: • sufficient evidence that is consistent throughout the report • evidence that is supported by data sources (e.g. quotes, reports, etc) • evidence that is explicitly triangulated, unless noted as having a single source • gaps in data are explained and justified • data sources that are reliable, adequate, sufficient for the scope of the review	Strengths/weaknesses: The report presents sufficient and adequate data, and evidence is clear.	5

Report Quality Criteria	UNEP Evaluation Office Comments	Final Report Rating
6. Does the report include rigorous analysis and logical findings? Consider the extent to which the findings are: - supported by clear analysis that is consistent with the evidence presented - logical, clear and coherent - aligned with UNEP's Criteria Ratings Matrix - aligned with the review framework - more than descriptions and provide insights into 'how' and/or 'why' the project performed a certain way - balanced, presenting both successes and weaknesses	<u>Strengths/weaknesses:</u> Findings are supported by analysis that is consistent with the evidence presented in the report. The analysis is also balanced and includes both strengths and weaknesses in projects performance.	5
Section E: Review Findings	Assessment	
7. Does the report present evidence and analysis of project Strategic Relevance with respect to UNEP, partner and geographic policies and strategies at the time of project approval? Consider how well the report addresses: - Alignment to the UNEP Medium Term Strategy (MTS), Programme of Work (POW) and Strategic Priorities - Alignment to Donor/GEF/Partners Strategic Priorities - Relevance to Regional, Sub-regional and National Environmental Priorities - Complementarity with Existing Interventions: complementarity of the project at design (or during inception/mobilisation³⁶), with other interventions addressing the needs of the same target groups.	<u>Coverage/omissions:</u> Required elements are adequately addressed. <u>Strengths/weaknesses:</u> The section adequately describes the project's alignment and strategic relevance with respect to UNEP, donors Regional and Global priorities, and complementarity with existing interventions.	5
8. Does the report present a summary of the strengths and weaknesses of the Quality of Project Design, based on the detailed assessment presented in the Inception Report?³⁷	<u>Coverage/omissions:</u> Elements are adequately addressed. The summary table with ratings of the design elements assessed is also presented in this section. <u>Strengths/weaknesses:</u> A concise analysis of the project design's strengths and weaknesses is presented.	No Rating Needed
9. Does the report recognise and describe, when appropriate, key features of the Nature of the External Context under which the project was implemented that limited the project's performance (e.g. conflict, natural	<u>Coverage/omissions:</u> Required elements are adequately addressed. <u>Strengths/weaknesses:</u> The report briefly describes the two main events (Hurricane Dorian and the	No Rating Needed

³⁶ A project's inception or mobilization period is understood as the time between project approval and first disbursement. Complementarity during project implementation is considered under Efficiency, see below.

³⁷ The Quality of Project Design criterion is not rated in this table because the majority of the analysis is presented in the Inception Report and the Final Terminal Review report only contains a summary.

Report Quality Criteria	UNEP Evaluation Office Comments	Final Report Rating
disaster, political upheaval ³⁸), and how they affected performance? ³⁹	COVID-19 pandemic) that affected the project implementation.	
10. Does the report present a well-reasoned, complete and evidence-based assessment of the Availability of Outputs to the intended beneficiaries? Consider how well the report presents: - a convincing, evidence-supported and clear presentation of the outputs made available by the project compared to its approved plans and budget - assessment of the nature and scale of outputs versus the project indicators and targets - assessment of the timeliness, quality and utility of outputs to intended beneficiaries - identification of positive or negative effects of the project on disadvantaged groups, including those with specific needs due to gender, vulnerability or marginalisation (e.g. through disability).	<u>Coverage/omissions:</u> All elements well addressed. <u>Strengths/weaknesses:</u> The reviewer provided an evidence-based assessment of the level of achievement of each output.	5
11. Does the report present a well-reasoned, complete and evidence-based assessment of the Achievement of Outcomes, as a result of the uptake, adoption and/or implementation of outputs by the intended beneficiaries? This may include behaviour changes at an individual or collective level. Consider how well the report presents: - a convincing and evidence-supported analysis of the uptake of outputs by intended beneficiaries - assessment of the nature, depth and scale of outcomes versus the project indicators and targets - discussion of the contribution, credible association and/or attribution of outcome level changes to the work of the project itself - any constraints to attributing effects to the projects' work - identification of positive or negative effects of the project on disadvantaged groups, including those with specific needs due to gender, vulnerability or marginalisation (e.g. through disability).	<u>Coverage/omissions:</u> All elements well addressed. <u>Strengths/weaknesses:</u> The reviewer provided a detailed and evidence-based analysis of the achievement of the project outcomes.	5
12. Does the report present an integrated analysis, guided by the causal pathways represented by the TOC, of all evidence relating to Likelihood of Impact? Consider how well the report presents:	<u>Coverage/omissions:</u> All elements well addressed. <u>Strengths/weaknesses:</u>	5

³⁸ Note that 'political upheaval' does not include regular national election cycles, but unanticipated unrest or prolonged disruption. The potential delays or changes in political support that are often associated with the regular national election cycle should be part of the project's design and addressed through adaptive management of the project team.

³⁹ The Nature of External Context is not rated in this table because it is not consistently applicable across all projects. Some review reports will simply record that there was no unexpected unfavourable external factors, while others may have to describe critical external events.

Report Quality Criteria	UNEP Evaluation Office Comments	Final Report Rating
- an explanation of how causal pathways emerged and the resulting change processes - an explicit discussion of how drivers and assumptions played out - an explanation of roles played by key actors and change agents - identification of any unintended negative effects of the project, especially on disadvantaged groups, including those with specific needs due to gender, vulnerability or marginalisation (e.g. through disability).	The analysis includes an assessment on whether drivers, assumptions, outputs, outcomes and intermediate states were in place by the end of project implementation.	
13. Does the report present an integrated analysis of all dimensions evaluated under Financial Management and include a completed 'financial management' table? Consider how well the report addresses the following: - adherence to UNEP's financial policies and procedures - completeness of financial information, including the actual project costs and actual co-financing used and explanation of any variances between planned and actual expenditures	<u>Coverage/omissions:</u> All elements well addressed. <u>Strengths/weaknesses:</u> The report presents an adequate analysis of the two dimensions under Financial Management.	5
14. Does the report present an integrated analysis of all dimensions evaluated under Efficiency? Consider how well the report presents: - cost-effective or time-saving measures put in place to maximise results within the secured budget and agreed project timeframe - implications of any delays and no cost extensions - discussion of making use, during project implementation, of/building on pre-existing institutions, partnerships and complementarities with other initiatives, programmes and projects etc. - the extent to which the management of the project minimised UNEP's environmental footprint.	<u>Coverage/omissions:</u> All elements well addressed. <u>Strengths/weaknesses:</u> The section well describes the factors that affected the project delivery/efficiency and the measures that were taken to address these.	5
15. Does the report present a well-reasoned, complete and evidence-based assessment of the project's Monitoring and Reporting? Consider how well the report addresses the following: - the quality of monitoring of project implementation (including use of monitoring data for adaptive management) - the quality of project reporting (e.g. PIMS and donor reports)	<u>Coverage/omissions:</u> All elements well addressed. <u>Strengths/weaknesses:</u> This section presents an adequate assessment of the two dimensions under Monitoring and Reporting.	5
16. Does the report present an integrated analysis of all dimensions evaluated under Sustainability (i.e. the endurance of benefits achieved at outcome level)? Consider how well the report addresses the following: - socio-political sustainability - financial sustainability - institutional sustainability	<u>Coverage/omissions:</u> All elements well addressed. <u>Strengths/weaknesses:</u> The section presents an integrated analysis of the three dimensions under sustainability. A clear indication of whether the project had an exit strategy would have been appreciated.	5

Report Quality Criteria	UNEP Evaluation Office Comments	Final Report Rating
17. Does the report present a well-evidence analysis of the Factors Affecting Performance, <u>either in this section or in cross-referenced sections</u>? These factors are not always discussed in stand-alone sections and may be integrated in the other performance criteria as appropriate. However, if not addressed substantively in this section, a cross reference must be given to where the topic is addressed, and that entry must be sufficient to justify the performance rating for these factors. Consider how well the report addresses the following cross-cutting issues: • quality of project management and supervision⁴⁰ • stakeholder participation and co-operation • responsiveness to human rights and gender equality • environmental and social safeguards • country ownership and driven-ness • communication and public awareness	<u>Coverage/omissions:</u> All elements well addressed. <u>Strengths/weaknesses:</u> The report presents a comprehensive assessment of the factors affecting performance as a stand-alone section.	5
Section F: Conclusions, Lessons Learned and Recommendations	Assessment	
18. Do the Conclusions present a summative assessment of the evaluand as a whole, reflecting on prominent aspects of the project's performance? Consider how well the conclusions: • provide a compelling narrative and integrated assessment of project project's performance (i.e. achievements and limitations) • add deeper insights and analysis beyond the findings under each individual criterion • are derived from the synthesized analysis of evidence gathered during the review process • provide clear and succinct response to the key strategic questions • address the human rights and gender dimensions of the intervention explicitly (e.g. how these dimensions were considered, addressed or impacted on) • provide lessons that are rooted in real project experiences, describe the context from which they are derived, and do not duplicate recommendations	<u>Coverage/omissions:</u> Elements are well addressed. Responses to the four key strategic questions and six lessons learned are also included in this section. <u>Strengths/weaknesses:</u> The section presents an integrated summary of the project's achievements, challenges, strengths and weaknesses.	5.5
19. Does the report present Recommendations for specific action to be taken by identified people/position-holders to resolve concrete problems affecting the project or the sustainability of its results? Consider how well the recommendations: • are clearly formulated and logically derived from the findings and/or conclusions • are feasible to implement within the timeframe and resources available (including local	<u>Coverage/omissions:</u> The Review identified three recommendations. <u>Strengths/weaknesses:</u> The Evaluation Office clarifies that the 'type' of a recommendation can be 'Project Level' or 'Partners' (as explained in the review tool 17	4.5

⁴⁰ In some cases, 'project management and supervision' will refer to the supervision and guidance provided by UNEP to implementing partners and national governments while in others, specifically for GEF funded projects, it will refer to the project management performance of the executing agency and the technical backstopping provided by UNEP. This includes providing the answers to the questions on Core Indicator Targets, stakeholder engagement, gender responsiveness, safeguards and knowledge management, required for the GEF portal.

Report Quality Criteria	UNEP Evaluation Office Comments	Final Report Rating
capacities) and specific in terms of who would do what and when - include at least one recommendation relating to strengthening the human rights and gender dimensions of UNEP interventions - represent a measurable performance target in order that the Evaluation Office can monitor and assess compliance with the recommendations. NOTES: (i) In cases where the recommendation is addressed to a third party, compliance can only be monitored and assessed where a contractual/legal agreement remains in place. Without such an agreement, the recommendation should be formulated to say that UNEP project staff should pass on the recommendation to the relevant third party in an effective or substantive manner. The effective transmission by UNEP of the recommendation will then be monitored for compliance. (ii) Where a new project phase is already under discussion or in preparation with the same third party, a recommendation can be made to address the issue in the next phase.	TR Recommendations Quality Guidance 15.07.25.docx). However, the reviewer indicated 'Operational/Sustainability', 'Institutional Coordination/Stakeholder Engagement' and 'Knowledge-sharing/South-South cooperation' as the 'type' of the three recommendations identified. It appears that the type of the first 2 recommendations is be 'Partners' whereas the third one 'Project Level'.	
Section G: Report Structure and Presentation	Assessment	
20. Is the report well-structured and complete? Does it: - follow the Evaluation Office structure and formatting guidelines - include all required sections and annexes, as applicable - not exceed 50 pages in length from the Executive Summary to the end of the Conclusion Does the report present information clearly and appropriately? Is it written: - in clear and accessible language - largely free from grammar, spelling and punctuation errors - in an adequate and professional tone - with the use of visual aids, such as maps, graphs tables and photos	Coverage/omissions: The report is complete and follows the Evaluation Office guidelines, even though it slightly exceeds the recommended length of 50 pages. All the required Annexes are included in the report. Strengths/weaknesses: The report is clear and well written. The tone is professional and adequate for an official document. Graphs and tables convey key information.	5.5
OVERALL REPORT QUALITY RATING		5.1

A number rating 1-6 is used for each criterion: Highly Satisfactory = 6, Satisfactory = 5, Moderately Satisfactory = 4, Moderately Unsatisfactory = 3, Unsatisfactory = 2, Highly Unsatisfactory = 1. The overall quality of the review report is calculated by taking the mean score of all rated quality criteria.

Rating the Report Quality Criteria

Rating (1-6)	Description
6	Provides all content with high quality.
5	Provides all content with minor weaknesses.
4	Provides most content with minor weaknesses.
3	Provides most content with significant weaknesses.
2	Omits substantive content with significant weaknesses.
1	Omits almost all content with major weaknesses.