

Policy Coherence in the GEF

A STAP Advisory Document

June 2023

STAP SCIENTIFIC AND TECHNICAL
ADVISORY PANEL
*An independent group of scientists that advises
the Global Environment Facility*



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Executive Summary

This Advisory Document extends STAP's original information brief on policy coherence presented to the Global Environment Facility (GEF) Council in June 2022. STAP's Information Brief "Framing Policy coherence for the GEF" (Stafford Smith et al. 2022) encouraged the GEF to **define "good" policy coherence formally in the context of global environmental benefits (GEBs)** to facilitate a common understanding of the term across the GEF partnership and **to articulate a GEF-wide policy coherence strategy** to coordinate and synergize approaches to this important issue. To this end, STAP suggested two objectives for policy coherence in a GEF context:

1. **Align and mobilize finance to achieve more ambitious levels of GEBs quicker**, creating synergies and managing trade-offs through better-integrated approaches, drawing on diverse sources of finance (public and private) to incentivize greater investment for GEBs.
2. **Ensure GEBs, once achieved, are not undermined or negated due to misaligned policies** that allow leakage, reduce GEB durability, or encourage investment in damaging behaviors.

The 2022 brief provided two examples of policy coherence outcomes which could be coordinated across GEF operational levels (i.e., project, program and portfolio-wide) to achieve these objectives. The present document adds six additional outcomes where the GEF could effectively pursue policy coherence, providing a further basis for a GEF-wide strategy on the topic. Section 1 introduces these additional examples, bringing the total to **eight examples of outcomes where synergies could be maximized by a GEF-wide strategy** and which could form the basis of its theory of change. Hence:

Recommendation 1: STAP re-emphasises the benefits of articulating an explicit strategy for coordinating approaches to policy coherence across GEF levels of operations.

Because achieving systems change through policy coherence is challenging, and dependent on meaningful and deep collaboration with stakeholders and agents of change, as described in the exemplary outcomes, STAP envisions a role for the GEF to support countries' needs to deliver positive policy changes; this leads to:

Recommendation 2: Through the Country Engagement Strategy and its National Dialogues, support individual countries' needs to develop horizontal and vertical policy coherence, building knowledge, capacity, and learning.

Countries need to engage with the policy cycle to improve national, or sectoral, policy coherence, while investing in efficient monitoring systems. The competitive window will present opportunities to act on these efforts, which can potentially be replicated across countries, or regions. On this basis, STAP urges:

Recommendation 3: Seek synergies across diverse GEF investments within individual countries and across groups of countries facing similar challenges concerning the impacts of policy (in)coherence on GEB durability.

STAP proposes five criteria (see Section 4) for screening proposals in the new competitive window for policy coherence, which should analyse and improve policy coherence, and establish systems, based on these criteria, to monitor policy coherence, and to share resulting lessons and knowledge; specifically:

Recommendation 4: Recognising government priorities, the GEF should apply STAP's five listed criteria to screen proposals in the new competitive window for policy coherence, ensuring projects establish systems to monitor policy coherence, and to share resulting lessons and knowledge.

1. Coordinating across levels of GEF operations

STAP’s 2022 Information Brief, “Framing Policy Coherence for the GEF” (Stafford Smith et al.), emphasised potential benefits to the GEF of creating a coordinated approach to supporting policy coherence across its levels of operations, a point reiterated in STAP’s advice to the GEF Assembly.¹ The brief contained two examples of how such coordination could be achieved to help frame a GEF-wide strategy for policy coherence. The current document elaborates on six additional examples of how a coordinated package of activities could deliver to specific policy coherence outcomes.

STAP identified two key objectives in Section 2 of the 2022 brief to frame the example outcomes for policy coherence: achieving better integration by maximizing synergies and managing trade-offs, and achieving better durability of outcomes by minimizing negative spillovers. Table 1 identifies four example outcomes for each of the two objectives.

Table 1: Example outcomes that could be sought under each of two key objectives for achieving policy coherence in a GEF context. Detailed example activities are presented in Table 2. (Source: STAP)

Key objectives for policy coherence in the GEF	Example outcomes
<p>1. Align and mobilize finance to achieve more ambitious levels of GEBs quicker, creating synergies and managing trade-offs through better-integrated approaches, drawing on diverse sources of finance (public and private) to incentivize greater investment for GEBs.</p>	<p>1.1 Reduce perverse incentives.</p> <p>1.2 Manage knowledge to identify successful approaches to policy coherence in similar context classes.</p> <p>1.3 Assist the private sector in aligning its investments coherently with environmental outcomes.</p> <p>1.4 Align policies to deliver prerequisite co-benefits that support enduring action on GEBs.</p>
<p>2. Ensure GEBs, once achieved, are not undermined or negated due to misaligned policies that allow leakage, reduce the durability of the GEBs, or even result in investment in damaging behaviours.</p>	<p>2.1 Address non-environmental policies that drive negative environmental impacts.</p> <p>2.2 Avoid investment in places where misaligned policies will undermine the durability of GEBs due to drivers that are beyond the scope of GEF’s influence.</p> <p>2.3 Align subnational, national and regional policies so they do not conflict.</p> <p>2.4 Support appropriate governance structures as an integral part of policy coherence.</p>

Achieving each of these outcomes leads to a coordinated suite of potentially overlapping operational approaches at different levels in the GEF (see Table 2). These approaches illustrate how the GEF can operationalize policy coherence across its levels of operation while recognizing that different issues require varying balances of coordination across levels. Indeed, this set of outcomes provide the foundation for a theory of change that could underlie a GEF-wide strategy. Table 1 in STAP’s 2022 brief noted that many extant tools and aspects of GEF operations could be harnessed to improve policy coherence. Some of these are described in Section 4.

Table 2: Possible activity packages that support the two policy coherence objectives and their example outcomes identified in Table 1, which could be coordinated across operational levels in GEF.^a

<p>1. To align and mobilize finance to achieve more ambitious levels of GEBs quicker, creating synergies and managing trade-offs through better integrated approaches, drawing on diverse sources of finance (public and private) to incentivize greater investment for GEBs.</p>	<p>2. To ensure GEBs once achieved are not undermined or negated, due to misaligned policies that allow leakage, reduce the durability of the GEBs, or even invest in damaging behaviors.</p>
<p>1.1 Reduce perverse incentives.</p>	<p>2.1 Address non-environmental policies that drive negative environmental impacts.</p>
<p style="writing-mode: vertical-rl; transform: rotate(180deg);">Projects ↔ Programs ↔ Portfolio levels</p> <ul style="list-style-type: none"> • Corporately, the GEF could work with the Multilateral Environment Agreements (MEAs) to influence countries to redirect perverse incentives and deliver GEBs. • The GEF could fund capacity-building of country focal points to convene cross-government discussions that identify perverse incentives and capture them in a knowledge management and learning system. • Integrated Programs could analyse perverse incentives in their area of focus and coordinate groups of countries to redirect perverse incentives toward positive GEB outcomes through innovation and engagement. • The policy coherence competitive window could develop projects designed to innovate around perverse incentives. • All projects, whether in an Integrated Program or a focal area, could analyse the policy contexts in which they propose to operate to identify perverse incentives that can be mitigated or redirected. Individual projects are unlikely to achieve much, but their screening process will raise awareness of the issue. 	<ul style="list-style-type: none"> • Corporately, the GEF can apply influence to improve the likelihood that recipient nations will demonstrate environment-friendly coherence across their national development policies; for example by supporting the International Conservation Caucus Foundation. • The GEF could fund capacity-building of country focal points to convene cross-government discussions that encourage coherence and government prioritization of projects for GEF funding that are unlikely to be undermined by policy incoherence. • Integrated Programs could analyse common challenges from incoherent policies in their scope and either avoid investing in projects subject to the policies or promote approaches that improve coherence in the program’s area of focus. • Policy coherence funds could be invested in aligned projects aimed specifically at innovating for policy coherence. • All projects, whether in an integrated program or a focal area, could analyse the policy contexts in which they propose to operate, intending to minimise funding in contexts where GEBs are unlikely to endure due to leakage or other negative spillovers.

^a Example outcomes 1.1 and 2.1 were initially presented in Stafford Smith *et al.* (2022)

Projects ↔ Programs ↔ Portfolio levels	1.2 Manage knowledge to identify successful approaches to policy coherence in similar context classes.	2.2 Avoid investment in places where misaligned policies will undermine GEB durability due to drivers beyond the scope of GEF's influence.
	<ul style="list-style-type: none"> • A GEF-wide knowledge management strategy should include mapping of successful responses to policy coherence in different contexts. • Programs and projects should monitor and systematically evaluate the effects of current and improved policy coherence on the durability of environmental benefits and the delivery of co-benefits. • Clear program guidelines should be established that define the outcomes with which other policies are intended to be coherent. This will ensure that policy debates do not avoid discussing political choices and entrench the status quo.² • Explicit indicators of policy coherence should be defined for projects based on understanding synergies and trade-offs between relevant policies and GEBs. 	<ul style="list-style-type: none"> • The GEF country engagement strategy should prioritize strengthening the skills and knowledge of Operational Focal Points regarding policy coherence. • Programs should analyze policy incoherence related to their scope and support deliberations among their projects' stakeholders and beneficiaries, avoiding investments where incoherences cannot be managed and, where they can be, including the management in project theories of change. • Projects and programs linked to regional/global value chains should describe plausible policy changes, analyzing the interactions between policy changes and GEBs to identify robust and equitable options.³ • Where project design addresses policy coherence, project theories of change should explicitly include governance, power dynamics and institutional arrangements.

Projects ↔ Programs ↔ Portfolio levels	1.3 Assist the private sector in aligning its investments coherently with environmental outcomes.	2.3 Align subnational, national and regional policies so they do not conflict.
	<ul style="list-style-type: none"> • Engage with private sector bodies globally and through the GEF's private sector advisory committees to develop their roles in promoting policy coherence and overcoming undue influence from vested interests.⁴ • Introduce appropriate metrics and incentivize Environmental, Social, Governance reporting on corporate policy coherence in private sector firms and value chains, such as in Taskforce processes on climate and biodiversity financial disclosures and related policies.⁵ • Require projects under the NGI program to consider policy coherence around GEB delivery when establishing financial models. • GEF projects and programs, including Integrated Programs, that work with the private sector in value chains should engage all actors in ensuring policy coherence in national and supranational policies in support of GEBs. 	<ul style="list-style-type: none"> • Implement consistency analysis, required by GEF policy, between global, national and subnational policies /institutional arrangements in project design for key GEBs, supporting this with capacity building through the country engagement strategy. • Corporately or through programs, the GEF should promote regional approaches that encourage frameworks for policy coherence across governance levels in natural country groupings based on geography or landscapes (e.g., peatlands, Amazon Basin, cocoa value chain). • Programs and projects should explicitly analyze and include stakeholder input at local scales⁶, ensuring the inclusion of stakeholders impacted by changes.⁷ • Projects supporting national land use planning should emphasize strong participatory processes that engage stakeholders across governance levels, allowing for changing beneficiary patterns across scales.

Projects ↔ Programs ↔ Portfolio levels

1.4 Align policies to deliver prerequisite co-benefits that support enduring action on GEBs.	2.4 Support appropriate governance structures as an integral part of policy coherence.
<ul style="list-style-type: none"> • At a portfolio level, bring together policymakers, communities and other key project actors across governance levels and environmental sectors to identify roles and responsibilities for delivering prerequisite co-benefits essential to enduring GEBs. • At a program level across countries, demonstrate to national policymakers, local communities and other key stakeholders the value of coordinated policies that support prerequisite co-benefits essential to the durability of GEBs. • At a project level, analyze whether a country's policies synergize or undermine delivery of co-benefits needed for enduring GEBs, such as sustainable livelihoods or disaster risk reduction⁸, as well as the GEBs themselves, especially locally, and reflect the findings explicitly in a theory of change. 	<ul style="list-style-type: none"> • The GEF should strengthen collaboration among regional and global actors that are actively engaged in developing changes to informal and formal governance systems and possess the influence and relationships to achieve regional and global policy coherence. • The GEF country support program, in alignment with relevant programs and focal areas, should facilitate learning connections and coordination between countries seeking similar areas of policy coherence. It should also coordinate across projects to seek synergies in policy coherence improvements among countries or regions. • Programs should explore limits to achieving coherence within their scope in different countries and identify governance transformations that address these limits. • Projects and programs should work with countries to analyze how to contextualize and strengthen policy coherence for issues such as the blue economy within existing governance systems (i.e., relevant policies/regulations, key actors and boundary organizations).⁹

2. Lessons from current activities for analysing policy coherence at a national level

Section 1 outlines additional approaches that the GEF could take to ensure that it has a well-articulated, internally consistent approach to policy coherence across all of its investments. In this section, we note the considerable work already applying frameworks to analysing current levels of policy coherence for specific sectors, particularly at the national level. Lessons from this work can be operationalised at program and even project levels, to enhance understanding of the policy landscape and to consider responding to identified incoherencies (see Section 3).

Frameworks for analysing policy coherence, such as that introduced by Nilsson et al. (2012), detail policy interactions across governance levels and sectors. Their framework relies on three steps: (1) creating an inventory of policy objectives; (2) screening interactions between policy objectives and sectoral policies, including environmental policies; and (3) in-depth mapping of key interactions. Synergies and conflicts between policies are assessed at three levels: policy objectives, policy instruments and implementation practices. In addition, the framework analyses interactions horizontally – the relationship between policies at the same level of governance – and vertically – the relationship across different spatial scales of governance from local to global.

Other frameworks also consider transboundary coherence between national and international policy and across national boundaries, temporal coherence which promotes long-term vision and coherence across political mandates/cycles, and political coherence which takes a policy decision through the steps necessary to translate it into action (see also Figure 1).¹⁰

Because the GEF works across multiple operational levels, frameworks like Nilsson et al. can help screen interactions between policy objectives (e.g., reduce forest degradation, improve community economic opportunities) and sectoral policies, both horizontally at the same level or vertically across different levels. For example, the GEF could use this framework to understand horizontally how improved community forest regulations positively or negatively affect forest management practices and income generation. Vertically, the screening would consider how international environmental agreements on forest, biodiversity or climate change conflict or synergize with national or local forest management practices and income-earning opportunities.

STAP contends that coordinating support for policy coherence across GEF's different operational levels will enable the GEF to respond to misaligned investments that could undermine GEB durability¹¹, while simultaneously contributing to global policy coherence in ways conducive to achieving MEA goals.

Another example of how the GEF could help countries tackle policy incoherence is by fostering project or program interventions that encourage policy repurposing (see outcome 1.1 in Table 2). For example, to address emissions from agriculture, which could double by 2040 if current policies are kept in place, the World Bank¹² is striving to improve food systems by fundamentally changing agricultural incentives and policies. The World Bank's goal is based on an analysis demonstrating how different scenarios of repurposing agricultural support can raise agricultural productivity by 30 percent and reduce greenhouse gas emissions by 30 percent.¹³ Other GEF agencies (see Box 1)

Box 1: A six-step approach to developing a repurposing strategy (Source: FAO et al., 2021)

Step 1: Estimate the support already provided.

Step 2: Identify and estimate the impact of the support provided.

Step 3: Design the approach for repurposing agricultural producer support, including identifying needed reforms.

Step 4: Estimate the future impact of the repurposing strategy.

Step 5: Review and refine the repurposing strategy prior to implementation.

Step 6: Monitor the outcomes of the new agricultural producer support.

are working on a six-step approach for countries to develop strategies tailored to their circumstances to repurpose agricultural support toward more efficient, equitable food systems.

At the same time, temporal analysis of policy coherence highlights that care must be taken to ensure good intentions do not go wrong, because time and transition dynamics are important aspects of delivering policy coherence. For example, synthetic fertilisers were banned too rapidly in Sri Lanka (see Box 2), leading to maladaptation and undermining the credibility of what was otherwise an important policy adjustment. By contrast, Sikkim state in India demonstrated a successful transition. Such risks can be alleviated through collaborative development of a good theory of change before policy implementation, highlighting the importance of engagement in the policy development cycle (see Section 3). Another temporal issue is that significant change simply takes time – often decades – so efforts must persist over multiple project cycles.¹⁴

The GEF could pilot repurposing efforts in its projects and programs, including in its Integrated Programs, thereby providing incentives for technologies and approaches that help maintain or increase agricultural productivity while reducing greenhouse gas emissions and delivering additional GEBs and co-benefits.

Box 2: The perils of rushed repurposing¹⁵

Sri Lanka's 2021 banning of synthetic fertilizers exemplifies how repurposing strategies must be carefully thought through. From the early days of the Green Revolution in the 1960s, Sri Lanka subsidized farmers' use of synthetic fertilizers and pesticides, encouraging an overdependence on the chemicals. By 2020, the total cost of fertilizer imports and subsidies was close to \$500 million each year. In 2019, Sri Lankan President Gotabaya Rajapaksa campaigned to transition the country's farmers to organic agriculture over a period of 10 years. However, in early 2020, Rajapaksa's government imposed a sudden, nationwide ban on the importation and use of synthetic fertilizers and pesticides (primarily driven for foreign exchange reasons), ordering the country's 2 million farmers to go organic. Most farmers had no idea how to successfully implement organic farming practices, and in protest many refused to farm altogether. The result was brutal. Domestic rice production fell 20 percent in six months. Sri Lanka, long self-sufficient in rice production, was forced to import \$450 million worth of this staple and its domestic price surged by around 50 percent. The ban also devastated the nation's tea crop, its primary export. Government action to increase the domestic production of organic fertilizers was too slow.

The intent to move to organic farming in Sri Lanka was laudable, but its implementation was poorly planned. By contrast, the Sikkim state government in Northern India began a program to go fully organic in 2003, reducing government subsidies on synthetic inputs by 10% each year, coupled with education investments. The goal was achieved in 2014, with all farmers now certified organic, synthetic fertilizers and pesticides now prohibited, and measurable environmental co-benefits in the forms of increased water quality and tourism.

3. How projects might engage with the policy cycle to improve policy coherence

Whereas Section 2 focuses on analysing the state of policy coherence in nations, this section considers potential actions based on these analyses. Section 1 suggests that some projects might simply analyse the state of policy coherence and avoid investments that would undermine GEBs. However, some projects, and certainly some programs, may go beyond analysis to actively help countries improve policy coherence. The latter requires engagement with the various stages of the policy cycle.

Where might a GEF project link into a policy cycle?

The classic text on policy cycles of Bridgeman & Davis (1988), now Althaus et al. (2017), describes a widely taught, ideal eight-stage cycle (see Figure 1). The stages include: issue identification, policy analysis, policy instrument development, consultation (which permeates the entire process), coordination, decision, implementation and evaluation.¹⁶ Of course, this is idealised and appears to ignore the realities of messy and contested political landscapes and the reality that policy usually proceeds by a complex suite of small steps rather than grand design.¹⁷ Nonetheless, it provides a useful formal structure for considering steps where external inputs can have influence. This depiction of the policy cycle applies to any scale, but is here discussed mainly at the national level.

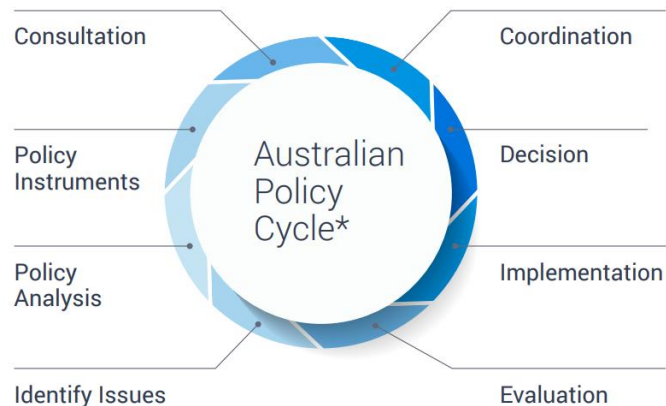


Figure 1: Policy cycle. Source: Althaus *et al.* (2017, 2020 edn)

Even accepting these caveats, it would be a naïve theory of change to expect that solely providing good information to policymakers would necessarily result in policy change, let alone changes in laws. Cairney and Jones (2016) reviewed the impact of Kingdon's (1984) proposal that **policy windows only open up when multiple streams converge, namely problem salience** (e.g., driven by events but perhaps made more likely through sustained advocacy and networking), **policy solutions** (which can be more available through preparatory work but are also affected by party ideology) **and aligned politics** (which can become more likely through sustained lobbying pressure and taking advantage of crises and other opportunities). Cairney (2016) and Cairney and Jones (2016) discussed limitations of using this "Multiple Streams Approach" to develop policy theory but noted its value in structuring approaches in practice.

Drawing on all this thinking, STAP identifies some actions that could be undertaken by GEF projects or programs specifically aimed at engaging with the policy cycle to address policy incoherence (see Table 3). STAP does not suggest that a single project would undertake all actions, but **the need for all actions might underlie a theory of change for achieving improved policy coherence, helping identify necessary allies in the effort**. Similar approaches, also linked to the policy cycle, have been used in the Poverty-Environment Action's Integrated Approach of the UNEP-UNDP (2022). That program illustrates national policy developments (e.g., aligning with agricultural policies in Malawi) and more fine-grained actions (e.g., harmonising sectoral and district performance contracts on environmental indicators in Rwanda).

In short, **paying attention to the policy cycle stages while recognizing the political realities of policy windows provides a framework for considering how GEF interventions could help drive action on policy coherence**.

Table 3: Potential project-based policy change activities that the GEF partnership could foster, mapped to the policy cycle (see Figure 1).

Policy cycle step	Potential activities for projects focused on policy coherence
1. Issue identification	Catalogue national or subnational policies and resulting actions (e.g., perverse subsidies, development permits). Identify who wins or loses from these actions (important for later steps), and the net effects on key environmental policy objectives, MEA goal adherence and other outcomes. These actions could be aimed at a single nation, at regional effects emerging from multiple nations, or at emergent (possibly non-geographic) impacts (e.g., across value chains or categories of communities such as Indigenous).
2. Policy analysis	Map policy origin (e.g., provincial, national, international), policy conflicts and synergies across governance levels, and how policies are justified in a location (e.g., for economic development, social protection, tourism enhancement, conservation, infrastructure development, industry development, international commitments). Develop an influence analysis of the people or lobbies that support different policy domains, considering leverage points on the stakeholders (e.g., are they directly or indirectly affected by environmental externalities such as through worker health or image and corporate responsibility routes?). What are the politics of policies, such as their concentration in marginal electorates, government or opposition?
3. Policy instrument development	Define the potential outcomes of a better policy instrument, reflected in terms of all aspects of steps 1 and 2, including effects on powerful stakeholders. Then develop alternative approaches that could deliver those better outcomes, preferably identifying several. Analyse the approaches in terms of effectiveness for environmental outcomes but also for their different effects on the winners and losers of the change. For the promising ones, attempt to develop model legislation or policy objectives that could be easily adopted if a policy window opens. Note that this step benefits greatly from consultation, partly to avoid poorly anticipated consequences (see Box 2), partly to test solutions that appease losers, and to achieve a wider diversity of innovative input.
4. Consultation	Engage with diverse actors to test issues and solutions, building opportunities for debate and deliberation and building momentum and lobbying interest beyond the project. Consult with policymakers to ensure ideas are not politically flawed and to raise consciousness of possible solutions without necessarily expecting action in the absence of a policy window. In particular, learn counter-lobbying pathways and rationales from vested interests/potential losers of policy change and identify ways to neutralise these reactions. Revisit step 3, if necessary. Simultaneously increase awareness among policy change winners.
5. Coordination	Build alliances (i.e., multi-stakeholder platforms) to lobby for policy change. Depending on conflict levels, attempt to involve winners and losers across the broad political spectrum, recognise solutions acceptable to all, and defuse sectoral politics. Use step 2 policy analysis to coordinate approaches across relevant policy/political interests. Do not waste effort on direct approaches until a policy window opens.
6. Decision	Establish a process that can act nimbly if a policy window opens to ensure policymakers are aware of extant policy options and even model legislation. Provide rapid technical assistance if policymakers seek adjusted approaches. Applaud positive decisions .
7. Implementation	Engage rapid response technical ability to assist with implementation problems.
8. Evaluation	Support policies that have received formal evaluations of success and track the removal of undesirable policies. These efforts can be conducted formally for policymakers but also independently to ensure data is public.

The GEF could focus its connection with the policy cycle on a thematic area such as mercury or land degradation at a national or transnational level (e.g., biome or value chain), or it could participate in a more generic national or global analysis of policies with environmental implications. The former is likely to be appropriate to programs, focal areas or projects; the latter may be more appropriate to projects in the competitive window for policy coherence (see Section 4).

Thematically, for example, the Kunming-Montreal Global Biodiversity Framework (GBF) adopted by the fifteenth meeting of the Conference of the Parties to the Convention on Biological Diversity¹⁸ includes two targets particularly relevant to policy coherence:

“TARGET 14: Ensure the full integration of biodiversity and its multiple values into policies, regulations, planning and development processes, poverty eradication strategies, strategic environmental assessments, environmental impact assessments and, as appropriate, national accounting, within and across all levels of government and across all sectors, in particular those with significant impacts on biodiversity, progressively aligning all relevant public and private activities, fiscal and financial flows with the goals and targets of this framework.”

“TARGET 18: Identify by 2025, and eliminate, phase out or reform incentives, including subsidies harmful for biodiversity, in a proportionate, just, fair, effective and equitable way, while substantially and progressively reducing them by at least 500 billion United States dollars per year by 2030, starting with the most harmful incentives, and scale up positive incentives for the conservation and sustainable use of biodiversity.”

The policy engagement process described above is primarily suited to a policy-by-policy approach to national policy incoherence, but the GBF targets require a more programmatic approach to analysing and later monitoring the emergent effects of a full set of policy changes. Specifically, the programmatic approach requires follow-through on GEB delivery, assurance that removal of perverse incentives improves conditions, and determination of why policy removal did not improve conditions if that is the outcome. This applies both nationally and more globally (i.e., where the targets are ultimately aimed). For example, Box 3 describes how international linkages mediated by trade can be used to drive incentives for policy coherence in favour of GEBs internationally.

Nonetheless, both targets could benefit from appropriately scoped analyses such as those described earlier to identify where incoherence among policies exists. Some of these incoherences may then be amenable to action to repurpose perverse incentives or engage in other ways with the policy cycle to remove conflicting priorities in favour of positive environmental outcomes, using approaches such as those in Table 2.

Similarly, the descriptions of Integrated Programs in the *GEF-8 Programming Directions* highlight diverse issues related to policy coherence (see Annex A). For example, policy coherence can be a vehicle to mainstream nature-positive production systems across levels of government, including addressing perverse incentives and subsidies, and this is generally facilitated by the establishment of systems that value natural capital. To these ends, capacity building, strengthened multi-stakeholder governance and attention to enforcement of laws and regulations are generally needed across sectors and levels of governance and along supply/value chains. Such actions, appropriately contextualised, could appear in most Integrated Programs and could be coordinated with other GEF activities. Any such activities would then require monitoring, both to determine their success and to learn better approaches, the topic of Section 4.

Box 3: Mobilizing food supply chains to respond to climate change while conserving nature¹⁹

In April 2023, China and Brazil agreed to strengthen collaborations to tackle climate change, including by establishing a subcommittee on the environment and climate change. Responding to their commitments under the Kunming-Montreal Global Biodiversity Framework and pledges for net-zero deforestation at the 2022 United Nations Climate Change Conference (COP27), the two nations are prioritizing the elimination of deforestation from commodity supply chains.

China is Brazil's main trading partner, accounting for one quarter of all Brazilian exports in 2022, including more than 55% of beef exports and 70% of soybean exports. Global commodity supply chains, like beef and soy, play a critical role in converting land, including deforesting the Amazon and Cerrado biomes. This collaboration is thus a significant opportunity to narrow leakage, where deforestation results from the misalignment of policies and regulations along supply chains between the two nations. Through their commitment to monitoring deforestation using satellite information, China and Brazil also have a tremendous opportunity to improve traceability along the supply chains for beef and soy to verify that policies and regulations are being met.

The European Union (EU) has engaged in a similar effort to ban imports of goods linked to deforestation. From 2024, the EU will require firms working in deforestation hotspots to certify that their goods have not harmed forests or caused various adverse social outcomes after 31 December 2020. The ban will prohibit importing commodities such as beef, soy, palm oil, coffee, cocoa and other products, unless their origins can be traced using geolocation data.

Thus, while trade teleconnections can undermine policy coherence, for example where substitution of supply by a less regulated producer results in leakage through the export of nature-damaging practices, these teleconnections can also be a powerful force for improving coherence between food security and environment policies.

4. Synergies among initiatives to enhance policy coherence

Whereas Section 1 outlines potential areas of coordination regarding policy coherence across the GEF portfolio, this section addresses three specific activities: the GEF's Country Engagement Strategy (CES), policy coherence monitoring, and the competitive window for policy coherence.

The GEF intends to operationalize policy coherence in part by implementing the CES, particularly through national dialogues. The GEF National Dialogues are expected to bring together relevant national stakeholders to discuss GEF programming and promote policy coherence within each country. Policy coherence will be used to strengthen national strategy and policy formulation across government ministries, such as environment and natural resources, energy, industry, agriculture and rural development, economy, planning, and others. Policy coherence is also expected to strengthen collaborative partnerships across the GEF, bringing together diverse actors from government officials to civil society and the private sector.

Proactive coordination of these efforts with other GEF-related work could increase the impact of the National Dialogues. Dialogues should highlight policy coherence issues that are pertinent to GEF investments related to a specific country to create synergies with the investments. The dialogues could also bring together groups of countries with similar policy coherence challenges relevant to GEF investments at a program or focal area level. In both cases, modest levels of coordination could enable the GEF to support policy coherence through cross-cutting government discussions that would eventually benefit both the countries and the GEF, leading to better integrated planning and more durable project outcomes.

Monitoring the level and consequences of improvements in policy coherence can help motivate action from the CES dialogues. It is worth appraising the baseline status of policy coherence in the geographic area of engagement (e.g., country, region, subnational). Approaches to monitoring policy coherence need not be developed from scratch. Instead, they can be harmonised with measures already underway in countries reporting on Sustainable Development Goal (SDG) Target 17.14.1. This target has an established methodology inspired by work from the Organisation for Economic Co-operation and Development (OECD) and scientists (e.g., Nilsson et al. 2012) on indicators tracking policy coherence progress for sustainable development (PCSD). Elements and indicators used to appraise policy coherence are elaborated in Annex B and Figure 2.

The OECD's PCSD framework can help focus on three key interrelated elements of the policy coherence cycle: institutional mechanisms, policy interactions and policy effects (see Figure 2). The ultimate intent of the framework is to determine a baseline level of different forms of policy coherence now and track progress over time, particularly in relation to GEF activities (i.e., did the activities help advance policy coherence to ensure durability of the GEBs targeted in the country concerned?). This approach could be applied at the Project Identification Form (PIF) stage and later project evaluation stages for a specific country; at the program level over the life of a GEF cycle in relation to key countries engaged with the GEBs relevant to a particular Integrated Program topic; or at the whole portfolio level by, for example, assessing the effectiveness of the CES dialogues or the competitive window for policy coherence.

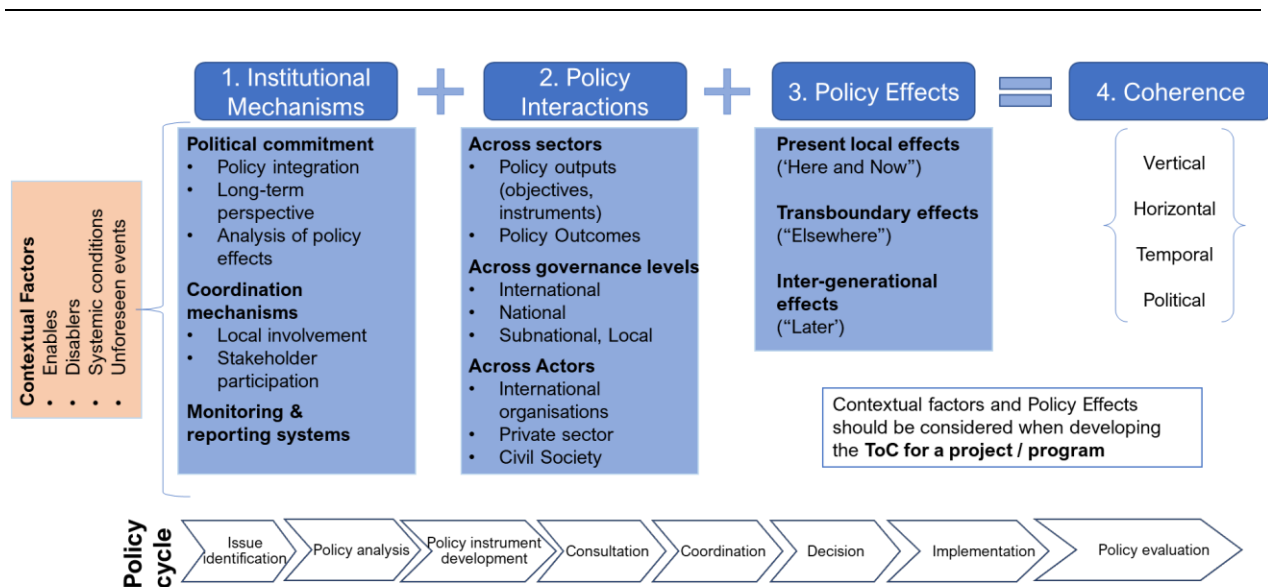


Figure 2: Key elements for appraising the status of policy coherence in a GEF project area prior, during and after a GEF investment. **Contextual factors** at the country, region and subnational levels can be influenced by national vision and national development plans/frameworks, and partly drive **institutional mechanisms (1)**. **Policy interactions (2)** must be identified and classified as trade-offs (counteracting) or synergies (reinforcing), which can help anticipate and address potential conflicts with proposed GEF investment outcomes (e.g., GEBs, co-benefits). **Policy effects (3)** consider the three dimensions of sustainable development and analyze the effects of policies on human wellbeing here and now, in other places now (e.g., telecoupling, leakage), and in the future. Together, these all inform various types of **policy coherence (4)** as the outcome of the appraisal: vertical, between different levels of government from local to national; horizontal, across key government ministries, departments and agencies and across sectors and themes; temporal, promoting a long-term vision and coherence across political mandates; and political, following a policy decision through all the steps necessary to translate it into action. Steps in the policy cycle (bottom; see also Section 3, Table 3) can help identify where and how policy coherence could be enhanced through the cycle. (Source: developed from Figure 4.1 in OECD (2017))

The **competitive window for policy coherence** will involve five countries and can play an important role in innovating around policy coherence, including operationalising approaches to monitoring. One approach is to use and adapt the building blocks for SDG Indicator 17.14.1 as suggested in Table 4 of Annex B. Projects in the window should seek synergies with other investments within the country of interest and with their peers, endeavouring to develop exemplars and lessons for others to follow (see Box 3).

The GEF secretariat will develop selection criteria for candidate concepts for the competitive window. The STAP suggests that these criteria should encourage project proponents to enhance coherence of national policies relevant to the global environmental issues of the GEF's mandate. They should include:

1. Evidence that relevant partners will be engaged early and substantively throughout project implementation, and that links are made with other GEF activities in the country concerned
2. Evidence that vertical, horizontal and temporal policy coherence are assessed in the Project Identification Form, with interactions among them analyzed and potential actions to support coherence articulated (e.g., in terms of addressing the policy coherence building blocks for SDG Indicator 17.14.1, see Annex B)
3. A theory of change that articulates a clear hypothesis about the relationship between policy coherence and enduring GEB outcomes (e.g., drawing on the key elements of Figure 1), and how the proposed actions will support these

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4. An explanation of how project innovation will help advance experience and learning about key assumptions in the theory of change (e.g., addressing gaps on how to tackle perverse incentives or how to improve effective, efficient coherence between policies)
 5. Concrete plans for measuring and assessing policy coherence, while advancing knowledge and learning about policy coherence within a framework that can be applied in other countries (e.g., how stakeholders organize, collaborate and negotiate to advance policy coherence within and across different levels of governance²⁰).

5. Conclusions

This Advisory Document builds on STAP's 2022 Information Brief, which aimed to frame policy coherence for the GEF, noting that "good" policy coherence in this context means policy alignment with achieving enduring GEBs. The 2022 brief identified a wide variety of activities and tools that can be applied to address policy coherence in different settings. It concluded by encouraging the GEF to strategically coordinate activities on policy coherence across all its levels of operations, a point reinforced in STAP's Report to the 7th GEF Assembly. To that end, the brief provided two examples of how policy coherence outcomes could be coordinated across projects, programs, the GEF portfolio, and more widely to the GEF's external relationships.

The current document adds six additional outcomes of policy coherence which together could provide a basis for developing a theory of change for a coordinated GEF-wide strategy on policy coherence (Section 1). The conclusion of the earlier Information Brief is underlined in the first of STAP's four recommendations to the GEF:

Recommendation 1: STAP re-emphasises the benefits of articulating an explicit strategy for coordinating approaches to policy coherence across GEF levels of operations.

Later sections of this Advisory Document form the basis of STAP's other three recommendations. These sections highlighted approaches to analysing policy coherence, including extant efforts to assess and pursue opportunities to repurpose incentives that are not nature-positive (Section 2); outlined ways to engage with the policy cycle to achieve policy change, where appropriate (Section 3); and explored three specific initiatives that could be addressed in a coordinated strategy for policy coherence across the GEF (Section 4). These are the Country Engagement Strategy (CES), approaches to monitoring the success of actions to improve policy coherence, and the competitive window for policy coherence.

National Dialogues under the CES are intended to address policy coherence across government ministries. Articulating an explicit intent for proactive coordination across all GEF investments related to each country to create synergies among those investments could enable these dialogues to have much greater impact. The dialogues could promote or even help fund explicit analyses of current levels of policy coherence (Section 2), as well as identify monitoring approaches specifically relevant at national and subnational levels (Section 4).

Recommendation 2: Through the CES and its National Dialogues, support individual countries' needs to develop horizontal and vertical policy coherence, building knowledge, capacity, and learning.

Aligning policies to deliver positive change is challenging and requires meaningful and deep collaboration with different types of actors. It also requires time and persistence, potentially across multiple GEF replenishment cycles. The GEF could support vertical policy coherence through its various activities by creating explicit opportunities for countries to deliberate, to reconcile differences in priorities and values at different levels of governance, and to embrace capacity to develop positive change. Above the national level, GEF activities and programs could also bring together groups of countries with similar policy coherence challenges relevant to GEF investments at a program or focal area level to permit south-south exchange and cooperation on policy coherence.

Recommendation 3: Seek synergies across diverse GEF investments within individual countries and across groups of countries facing similar challenges concerning the impacts of policy (in)coherence on GEB durability.

The competitive window for policy coherence, while targeted at five countries, could also promote research priorities based on similar approaches: analysing sectoral or national policy coherence, exploring ways to engage with the policy cycle to improve coherence, and developing useful and

efficient monitoring systems. The maturity of policy coherence proposals can be evaluated with a list of five criteria (Section 4); the target of these projects will be determined by countries, of course, but the criteria can help screen process quality in projects submitted through the competitive window .

Recommendation 4: Recognising government priorities, the GEF should apply STAP's five listed criteria to screen proposals in the new competitive window for policy coherence, ensuring projects establish systems to monitor policy coherence, and to share resulting lessons and knowledge.

In practice, this means establishing systems to monitor policy coherence and share resulting lessons and knowledge, considering the five criteria identified: early engagement with relevant partnerships; appraisal of vertical, horizontal and temporal policy coherence at the PIF stage; a theory of change that articulates the relationship between policy coherence and enduring GEBs outcomes; explanation of how project innovation helps advancing experience and learning on key assumptions laid in the theory of change; and concrete plans to measure and assess policy coherence.

Annex A: Policy coherence in GEF-8 Integrated Programs

The following references to policy coherence in relation to the GEF-8 Integrated Programs were extracted verbatim from their descriptions in the *GEF-8 Programming Directions*. The proposed interventions on policy coherence continue to be elaborated during ongoing development of the Integrated Programs, but their implementation was not yet finalized at the time of this document's preparation. Unlisted Integrated Programs had no explicit mention of policy coherence in the *Programming Directions* document.

Integrated Program	Interventions on policy coherence described in <i>GEF-8 Programming Directions</i>
Food Systems	Support national and subnational governments to engage across public agencies to incorporate nature-positive production systems into their national development plans and strategies for climate, biodiversity, and land degradation. In parallel, policy changes should better assess, account and value the natural capital, and shift financial flows away from perverse subsidies and nature-degrading investments toward nature positive investments.
Ecosystem Restoration	Promote policy coherence and provide advisory support for sectoral integration at national and subnational level, including the elimination of harmful subsidies in the agricultural sector.
Sustainable Cities	Focus on themes of global importance to sustainable cities, including technology innovation, policy coherence for net zero emissions in the built environment, urban Nature-based Solutions, models for circularity pathways and application of spatial data and digital technologies.
Amazon, Congo, and Critical Forest Biomes	Strengthen multi-scale and multi-stakeholder governance and law enforcement for increased policy coherence to conserve and sustainably manage forests and eliminate perverse subsidies.
Circular Solutions to Plastic Pollution	Prioritize policy coherence across government agencies to ensure that measures to reduce plastic pollution are not negated by contradictory policies. Ensuring policy coherence will require a thorough review of government policies and strong interagency communication, collaboration, and negotiation.
Blue and Green Islands	Use data from the valuation of natural capital to facilitate the integration of sectoral policies at sub-regional, national, and local levels. Engagement across governance levels will also be encouraged for land use/coastal zone planning and policy reforms.
Net-Zero Nature-Positive Accelerator	Policy coherence and elimination of subsidies to non-Paris aligned technologies or practices will be central to accelerate nature positive, net-zero results. These efforts may include support for the econometric analyses of scenarios to reform fiscal spending and subsidies in the agriculture, energy, and transport sectors, amongst others.
Elimination of Hazardous Chemicals from Supply Chains	Harmonize policy incentives to drive innovation across the supply chain and that support business-to-business partnerships and financial incentives. (*Objective 1 - Policy Coherence for the Management of Sustainable Supply Chains)
Greening Transportation Infrastructure Development Integrated Program	Strengthen integrated, multisectoral, and participatory upstream planning and design. The aim will be to create and apply systems for multisectoral, stakeholder-based upstream planning to identify transportation infrastructure service needs at the national and subnational landscape/seascape scale and over long-term horizons, along with priority areas of investment in nature to provide ecological services.

Source: *GEF-8 Programming Directions*²¹

Annex B: Examples of existing indicators to appraise policy coherence

The integrated SDG Indicator 17.14.1 led by UNEP identifies eight mechanisms²² that can be used to enhance policy coherence. These are similar to the “building blocks for policy coherence” developed by the OECD work on PCSD (Soria Morales and Lindberg, 2017). Drawing on both sources, Table 4 suggests some specific indicators which GEF investments could use to monitor policy coherence, which are mostly indicators of process.

Table 4: Building blocks of policy coherence and examples of indicators for assessing and tracking its progress²³

Policy coherence building block	Examples of indicators that the GEF project/programs could use for monitoring
1. Political commitment (institutionalisation)	Political commitment to policy coherence expressed/endorsed at the highest government level and formally incorporated into domestic law and/or national strategic frameworks and/or plans
2. Policy integration	Mechanisms (e.g., interministerial, multistakeholder) have the power to make strategic decisions that influence and align planning, budgeting, legislation, sectoral programs and policies
3. Long term vision in decision making	Strategic planning framework; objectives of national strategies developed by government go beyond current electoral cycle; intergenerational timeframe
4. Policy effects	Mechanisms in place for assessing negative impacts on GEBs of domestic policies expected to be achieved at home (i.e., here and now) and abroad (i.e., transboundary, elsewhere); measures developed that maximise synergies and mitigate negative effects; analyses carried out of potential effects of today’s policy decisions on the wellbeing of future generations (e.g., strategic foresight, scenarios, theory of change)
5. Policy coordination	Government (e.g., national, subnational) mechanisms enable ministries and public sector agencies to share information, distribute responsibilities, allocate resources and resolve conflicts of interest or inconsistencies
6. Regional & local involvement	Mechanisms in place enable systematic consultation, collaboration and alignment of efforts at national, subnational and local levels (i.e., vertical coherence)
7. Stakeholder participation	Mechanisms established to promote stakeholder participation (e.g., civil society, business, industry, science, academia) in development of policies and plans; consultation can take place at various stages of the policy cycle
8. Monitoring and reporting	Monitoring and reporting systems developed or in place to inform policy change that addresses negative effects (here and now, elsewhere, later); data and information management systems in place

These suggested process indicator examples for the eight policy coherence building blocks are qualitative²⁴ and relate to institutional structures (e.g., arrangements for interministerial coordination), processes (e.g., planning, funds allocation) and working methods (e.g., provisions for cross-sectoral collaboration).²⁵ They can be developed to appraise whether and how institutional mechanisms are promoting policy coherence, as informed by good practices and past experience.

A dashboard can integrate these indicators to enable visual appraisal of strength, mechanisms enabling policy coherence, and areas for improvement (Figure 2). It is an alternative to the approach proposed by the SDG methodology – aggregating the indicators into a composite number – which loses information about how the score emerges. The indicators could be used to assess policy coherence prior to GEF investment, to ascertain policy (in)coherence, and to inform project design (e.g., objectives, theory of change, pathways, assumptions, actions, outputs). The same indicators could be used for final evaluation of GEF project outcomes to assess whether predefined policy coherence objectives for GEBs were met. A score similar to one established for OECD water governance indicators²⁶ can be added to the dashboard. Complementary indicators, depending on national context and the GEBs being pursued, can be developed to track policy coherence progress.

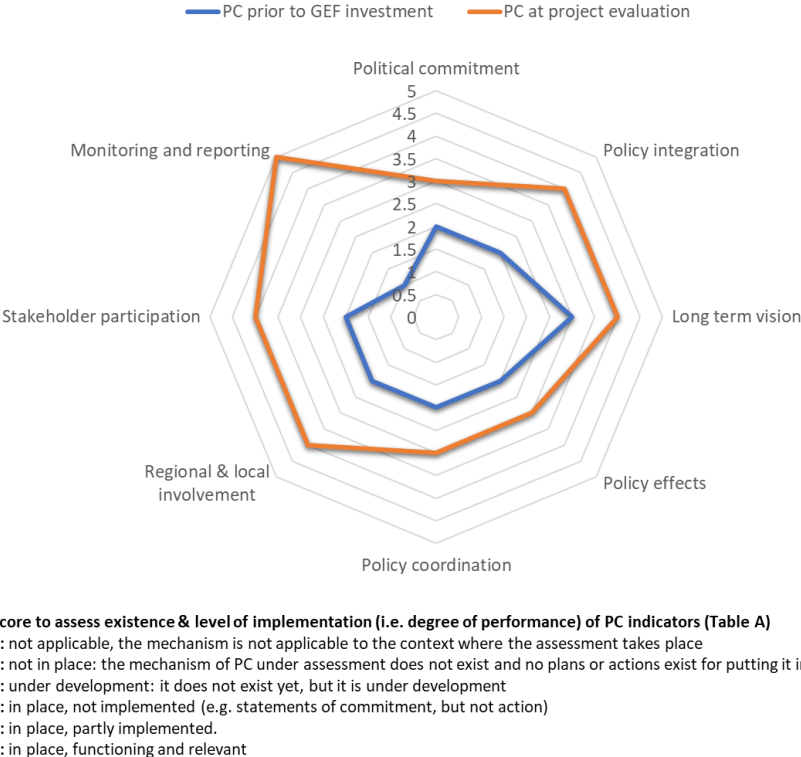


Figure 3: Hypothetical example of a dashboard for appraising policy coherence before, during and after GEF investments.

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Endnotes

- ¹ See Stafford Smith et al. (2022) and “Looking forward to the 7th GEF Assembly in 2023: STAP’s report on catalysing transformational change through GEF investments.”
- ² Yunita et al. (2022) describe the impact of the SDG’s approach to policy coherence in reducing the likelihood of policy transformation in the Netherlands.
- ³ Villoria et al. (2022) describe a case where requiring standards on soy supply chain exports could have reduced deforestation leakage in Brazil without moving it elsewhere.
- ⁴ The guidance notes on OECD and UNDP (2021) impact standards for financing sustainable development are relevant here.
- ⁵ E.g., see Robins et al. (2021) for a just transition in the United Kingdom.
- ⁶ Sari et al. (2021) provide an example of the importance of policy coherence analysis at a landscape scale in peatland forests in Indonesia.
- ⁷ Boehm et al. (2022), Grabs et al. (2021)
- ⁸ E.g., Zembe et al. (2022) analyse coherence between food security, DRR and climate adaptation policies in South Africa, which could be used to explore whether GEBs related to land management and emissions reduction are supported through co-benefits in these areas.
- ⁹ Voyer et al. (2020) provide an example of this analysis for the blue economy in Timor-Leste.
- ¹⁰ Other forms of policy coherence can also identified. E.g., see Table 3 in Koff et al. (2020).
- ¹¹ Stafford Smith et al. (2022)
- ¹² Gautam et al. (2022)
- ¹³ Three other scenarios were modelled in the study to re-orient agricultural support to countries: (1) removal of domestic support, (2) restructure domestic support that relies on current technologies and practices and (3) support conditionally based on adoption of emission-reducing practices.
- ¹⁴ E.g., Vos et al. (2022). Similarly, the Poverty-Environment Action’s Integrated Approach and its progenitor, the Poverty-Environment Initiative have run for over 16 years, at times taking this long to achieve success (UNDP and UNEP, 2022).
- ¹⁵ Sources: <https://www.greenpeace.org/aotearoa/story/on-sri-lankas-fertiliser-ban/> and <https://www.greenpeace.org/aotearoa/story/the-state-that-proved-its-possible-to-go-100-organic/>. For other perspectives, see <https://www.theguardian.com/world/2022/apr/20/sri-lanka-fertiliser-ban-president-rajapaksa-farmers-harvests-collapse>, <https://www.ft.lk/front-page/Inorganic-fertiliser-ban-could-harm-production-with-major-implications/44-719325>, <https://foreignpolicy.com/2022/03/05/sri-lanka-organic-farming-crisis/>.
- ¹⁶ Macfadyen et al. (2014), based on Young and Mendizabal (2009), describe the equivalent eight steps of the “ROMA” process, providing useful guidance aimed more at the actions for researchers seeking to influence policy. Other cycles aimed at informing intervention are provided by the [EGU](#) and RUFORUM, as well as the OECD.
- ¹⁷ E.g., Vos et al. (2022) discuss the resistance to policy coherence and need for space to deliberate, design, deal with power, embrace capacity, etc. This also highlights how substantial policy coherence change is likely to take decades. See also Cairney (2016) and Cairney and Jones (2016). Demos Helsinki (2023) integrate resilience and transformation into a policy cycle to provide policymakers with an approach that helps them consider future trends and outcomes influencing governance”.
- ¹⁸ The Kunming-Montreal Global Biodiversity Framework (GBF) was adopted during the fifteenth meeting of the Conference of the Parties (COP 15) in December 2022 following a four year consultation and negotiation process. Information about the GBF is provided by the Convention on Biological Diversity.
- ¹⁹ Sources: <https://www.gov.br/mre/en/contact-us/press-area/press-releases/brazil-china-joint-statement-on-combating-climate-change>, <https://www.worldstopexports.com/brazils-top-import-partners/>, <https://www.weforum.org/agenda/2023/04/the-brazil-china-beef-alliance-signposts-a-more-positive-future-for-the-world-s-most-important-ecosystems/>, <https://news.agropages.com/News/NewsDetail---45970.htm>, <https://climatchangenews.com/2023/04/14/china-and-brazil-to-cooperate-in-stopping-illegal-trade-fueling-deforestation/>, <https://www.theguardian.com/environment/2023/jan/05/eu-ban-on-deforestation-linked-goods-sets-benchmark-say-us-lawmakers#:~:text=From%202024%2C%20the%20EU%20will,date%20of%2031%20December%202020>, <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A52022PC0071>.
- ²⁰ E.g., see Morrison et al. (2023), Biermann et al. (2022), Sari et al. (2021)
- ²¹ See GEF Secretariat (2022)
- ²² The SDG methodology proposes a composite indicator for policy coherence of sustainable development that covers mechanisms related to (1) institutionalization of political commitment, (2) long-term considerations in decision making, (3) inter-ministerial and cross-sectoral coordination, (4) participatory processes, (5) policy linkages, (6) alignment across government levels, (7) monitoring and reporting for policy coherence, (8) financing for policy coherence. Source: <https://www.unep.org/explore-topics/sustainable-development-goals/why-do-sustainable-development-goals-matter/goal-17-14-1>, <https://unstats.un.org/sdgs/metadata/files/Metadata-17-14-01.pdf>.

²³ Sources: adapted Soria Morales and Lindberg (2017), Fig.1 in OECD (2017) and text on Indicator 17.14.1 at <https://unstats.un.org/sdgs/metadata/>.

²⁴ More quantitative approaches are being developed also. E.g., see Guerrero and Castañeda (2020) and Koff et al. (2020).

²⁵ OECD (2018b). See also summary at https://www.oecd.org/gov/pcsd/Draft%20proposal_PCSD%20process%20indicators.pdf.

²⁶ OECD (2018a)