



1. Program Information

Country
Colombia

Practice Area (Lead)
Environment, Natural Resources & the Blue Economy

Programmatic DPF

Planned Operations
0

Approved Operations
0

Operation ID
P150475

Operation Name
Colombia DPL for Sustainable Development

L/C/TF Number(s)	Closing Date (Original)	Total Financing (USD)
IBRD-85380	31-Oct-2016	700,704,760.00
Bank Approval Date	Closing Date (Actual)	
30-Sep-2015	31-Oct-2016	
	IBRD/IDA (USD)	Co-financing (USD)
Original Commitment	700,000,000.00	0.00
Revised Commitment	700,000,000.00	0.00
Actual	700,704,760.00	0.00

Country
Colombia

Practice Area (Lead)
Environment, Natural Resources & the Blue Economy

Operation ID
P161642

Operation Name
Second Sust. Dev. and Green Growth DPL (P161642)



L/C/TF Number(s) IBRD-85380,IBRD-88060	Closing Date (Original) 31-Dec-2018	Total Financing (USD) 500000000.00	
Bank Approval Date 14-Dec-2017	Closing Date (Actual) 31-Dec-2018		
	IBRD/IDA (USD)	Co-financing (USD)	
Original Commitment	500,000,000.00	0.00	
Revised Commitment	500,000,000.00	0.00	
Actual	500,000,000.00	0.00	
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2. Program Objectives and Pillars/Policy Areas

a. Objectives

The first Development Policy Loan (DPL 1) operation, approved on September 30, 2015, was prepared as the first of three single programmatic operations. The operations aimed at supporting the government's overarching green growth strategy, of advancing economic growth compatible with climate change considerations. The Loan Agreement does not explicitly state the Program Development Objectives (PDOs). The PDOs as stated in the First Program Document were;

- **Establish a set of policy and institutional measures for green growth in transport, energy, environmental health and disaster risk management.**
- **Improve environmental quality by reducing Particulate Matter 2.5 in the air; strengthening regulatory instruments for reducing water pollution; and increasing capacity for solid waste disposal and enhancing waste recycling.**

Colombia's pledge in July 2017 to abide by the Paris Agreement for reducing greenhouse gas emissions, and the accelerated formalization of the Colombian Peace Process for ending the conflict with the Colombian Revolutionary Forces (FARC) guerilla group, accorded opportunities for strengthening the DPL operations. Also, the proposed third DPL operation would have fallen in the early period of a new administration and exposed the operation to unnecessary risks. (ICR, page 12). Hence, the second and the third operations were merged in a single operation. By delaying the second operation, policy reforms from the third operation centering on green growth and environmental quality in key sectors and prior actions for peace building and



promoting green growth in rural areas, were merged in a single final operation (as envisioned the original DPL operations focused only on urban areas). The PDOs as stated in the Second Program Document for the second and final operation in the series were:

1. To support a set of policy and institutional measures for green growth in transport, energy, environmental health and natural resources:

2. Improving environmental quality for reducing Particulate Matter 2.5 in the air, strengthening regulations for sanitation and increasing capacity to reuse and dispose solid waste.

The second operation broadly maintained the original areas, but made adjustments in view of the changing circumstances: (i) It replaced disaster risk management with management of natural resources, as the former activity was financed by parallel donors (discussed in section 2c): (ii) It shifted one focal area of "strengthening regulatory and economic instruments for reducing water pollution" with "strengthening regulations for water sanitation": (The area of strengthening economic instruments for water sanitation) was financed by parallel donors (discussed in section 2c): and (iii) It reformulated "solid waste disposal and enhanced waste recycling" to "reusing and disposing solid waste". Following this, five indicators were dropped and six added.

The PDOs of the final operation shared the same higher level objectives of enhancing growth with climate change considerations, and the areas of reform that will help the country move towards that goal. Given that the underlying focus on green growth and environmental sustainability in key sectors were preserved and new reforms were included in view of the changing circumstances, there will not be a split rating of objectives and efficacy will be assessed on the PDO for the final operation, which still combines an explicitly succinct objective statement.

b. Pillars/Policy Areas

The pillars and policy areas, which were the same as the PDOs stated above, are discussed in Section 3b.

c. Comments on Program Cost, Financing and Dates

Project financing. The DPO was financed by an IBRD loan of US\$1.2 billion (US\$700 million for DPO 1 and US\$500.0 for DPO 2). This amount was fully disbursed. There was parallel financing for budget support operations on: (i) disaster risk management activities from the German state-owned development Bank (kfW) and the Development Bank of Latin America (CAT): (ii) supporting economic instruments for wastewater management from the kfW: (iii) supporting climate adaptation activities from the French Agency for Development (AFD): and technical assistance support to Colombia's green growth mission from the Korean Green Growth Trust Fund.

As part of this operation, the Bank included in the Loan Agreement an option for the government to request a "Catastrophe Transaction" (CAT bond) to mitigate the effects of natural disasters. This option allowed Colombia to participate in a regional initiative of the "Pacific Alliance" (an alliance formed through a multilateral agreement among the governments of Colombia, Chile, Mexico and Peru), that resulted in the largest sovereign risk insurance transaction at the time (US\$1.36 billion, of which US\$400 million was reserved for Colombia). Linking the CAT bond to this series allowed Colombia to join the initiative and thereby facilitate access to cost-efficient



coverage for earthquake risk. No such event occurred and hence no payment was made to Colombia during the execution of this operation.

Dates. DPL1 approved on September 30, 2015, closed on October 31, 2016. DPO 2 approved on December 14, 2017, closed on December 31, 2018. As the gap between the approval of the first operation and the second operation was more than 24 months, a waiver was approved by the Vice Presidency for Operations Policy and Country Services to prevent the series from lapsing.

3. Relevance of Design

a. Relevance of Objectives

Country context. Colombia's economic performance, with 3.2 percent average real Gross Domestic Product (GDP) growth between 2002 and 2012, had contributed to significant poverty reduction (with the share of population classified as poor declining from 49% in 2003 to 27% in 2012) and shared prosperity (with income growth of the bottom 40% of the population reaching 6.6% as compared to 4.1% for the total population). Alongside these macroeconomic developments, the government proceeded with peace negotiations with the FARC guerilla group, reaching agreements on three out the five negotiation topics for ending the conflict (illegal drugs, rural development and political participation). In recognition of the macroeconomic achievements, Colombia was invited to start its accession process with the Organization for Economic Cooperation and Development (OECD) in 2013.

Economic growth before appraisal was however sustained by declining stock of natural capital. Natural capital represented a significant share of Colombia's total wealth (10% as compared to 73% of human capital and 18% for produced capital), and Colombia's stock of natural capital, was under threat due to factors, such as air and water pollution in urban areas, forest and land degradation in rural areas and growing vulnerability to climate change effects. The combined natural resource losses damages were estimated to represent 37% of GDP in 2007. Reducing the impact of pollution on human and man made capital and reducing resource depletion and environmental degradation was important for the government strategy.

Government strategy. The central theme of the National Development Plan for 2014-2018, approved through article 1 of Law Number 1753 in 2015, was "*green growth*". The plan articulated the need for integrating environmental considerations in key sectors (discussed in section 3b). The NDP was based on a multi-sectoral and interregional dialogue that was aligned with Colombia's accession to the OECD. The government also signed the Green Growth Declaration (moving towards a growth trajectory that reduces pollution and emissions, uses natural capital sustainably and is resilient to natural disasters and climate change), as part of its OECD accession process. The National Planning Department (DNP) also launched in February 2017, a green growth mission, for preparing the analytical underpinnings of a green growth policy to 2030. The PDOs were reiterated by the National Development Plan for the 2018-2022 period.

Bank strategy. The objectives were well-aligned with the Bank strategy. The second strategic theme of the Country Partnership Strategy (CPS) for 2012 - 2016 highlighted the need for sustaining growth with enhanced climate change resilience considerations (CPS, page 17). The Bank's current Country Partnership Framework (CPF) for 2016-2021 highlighted the need for enhancing capacity for managing natural resources in targeted regions (CPF, page 19).



This operation was preceded by a Bank-financed three part sustainable development DPL series. This series sought to extend the Bank support to the government strategy and build on the long standing dialogue with the government. When this operation was prepared, Colombia had a two-year Flexible Credit Line (FCL) arrangement with the International Monetary Fund (IMF) of US\$11.35 billion, as a precaution for protection against external tail risks (risks associated with rare events).

b. Relevance of Prior Actions

Rationale

There were fourteen prior actions in all (including five for DPL1 and nine for DPL2).

Pillar 1. Establish a set of policy and institutional measures for green growth in transport, energy, environmental health and disaster risk management.

Theory of Change. Mainstreaming green growth across key economic sectors (transport, energy, environmental health and forest management), were likely to **aid in** realizing the government's green growth strategy. This together with pillar two activities aimed at controlling air and water pollution, wastewater management and recycling solid waste, were likely to aid in achieving the long term development objectives of decoupling economic growth from climate change considerations.

1. Government's green growth strategy. Reforms in this area aimed at the government's strategy to ensure green growth principles across sectors in the first DPL operation. The second DPL operation supported establishing a legal framework for climate change mitigation and adaptation, following Colombia's ratification of the Plaza Agreement for reducing greenhouse gas emissions in July 2017.

As a DPL 1 prior action, the government articulated the green growth strategy as part of its National Development Plan. This strategy, defined guidelines for developing and improving public transportation systems, entitled territorial entities (including districts and municipalities) establish new funding sources for public transportation systems and infrastructure investments for non-motorized transport modes, and providing resources for developing alternative renewable energy sources. As a DPL2 prior action, the government approved the Paris Agreement, and established the legal framework for international cooperation on climate change and adopting national targets for reducing greenhouse gas emissions.

Transport sector. The policy reforms in this area aimed at reducing greenhouse gas emissions in the transport sector. Specifically the reforms aimed at discouraging energy-intensive motorized transport modes, and promoting public transit and energy efficient non-motorized transport modes. As a DPL2 prior action, the government established a regulatory framework for promoting clean energy transportation system through Law Number 1811 in 2016. The framework included: (i) incentives for using bicycles: (ii) regulations for registration and safety inspections for motorized transport modes (motorcycles, three-wheeled motorcycles and quad-trucks): and (iii) the government set policy guidelines for co-financing public transport investments in Bogota- Cundinamarca and Soacha.

Energy sector. The reforms in this sector aimed at reducing greenhouse gas emissions, through developing alternative renewable energy sources (such as, geothermal, solar, biomass sources). Specially, the reforms aimed at securing funding for the Non-Conventional Energies and Energy Efficient Fund (FENOGE) for supporting programs and projects for developing renewable energy sources. As a DPL2 prior



action, the government strengthened the legal and regulatory framework for promoting such sources by: (i) defining FENOGE as a stand alone Trust Fund, thereby enabling that the Fund could receive funding from sources other than the government: (ii) defining FENOGE's funding sources and the composition and functions of its Board of Directors: and (iii) through Decree Number 884 issued on May 2017, established criteria for prioritizing the use of non-conventional energy sources in the National Rural Electrification Plan, for supporting peace building in the former conflict areas.

Environmental Health. The policy reforms in this area aimed at reducing the risk to health from chemical substances. Specifically the reforms aimed at developing standards for strengthening risk management to chemical substances, that were aligned with OECD recommendations. As a DPL2 prior action, the government established a regulatory framework for: (i) categorizing chemical substances in industrial uses: (ii) preventing major chemical accidents through regulations on industrial work safety procedures, contingency plans for industrial facilities, and measures for monitoring, inspection and control systems: and (iii) developing instruments for enhancing the institutional, financial and legal capacities for managing chemical substances.

Forest Management. The policy reforms addressed issues pertaining to greenhouse gas emissions from deforestation (due to factors such as, extensive ranching, agricultural sector expansion and illegal logging). Specifically the reforms aimed at developing effective instruments for protecting and managing forests. As a DPL2 prior action, the government adopted regulatory measures for protecting forests and improving monitoring by: (i) establishing the Payment for Environmental Services (PES) system (an instrument that national and subnational agencies can use for environmental management), through Decree number 870 in May 2017: (ii) clarifying the functions of the National Information System of Forests (SNIF), the National Forests Inventory (IFN) and the Forests and Carbon Monitoring Systems: and (iii) establishing the Forests for Peace Program through Resolution 470 in 2017, for integrating biodiversity conservation into projects that generate income from goods and services in areas, that were previously off-limits for development due to the conflict, and the Intersectoral Commission for Deforestation Control.

Pillar 2. Improve environmental quality by reducing Particulate Matter 2.5 in the air: strengthening regulatory instruments for reducing water pollution: and increasing capacity for solid waste disposal and enhancing waste recycling.

Air quality. The reforms in this area addressed issues pertaining to health risks, due to air pollution (such as due to the use of diesel in cargo transport). Specifically the policy reforms aimed at setting standards for increasing the use of biofuels to reduce the generation of air pollutants, such as Particulate Matter (PM) 2.5 and black carbon. As a DPL1 prior action, the government adopted regulations for updating the quality parameters for diesel fuel at the national level. As a DPL2 prior action, the government adopted measures to strengthen air quality management by: (i) approving a resolution for updating outdoor air quality norms and setting new progressive maximum permissible levels (starting in 2018 through 2030) for "criteria pollutants", including PM2.5: (ii) increasing the biofuel component to 9% in diesel (B-9): and (iii) revising the parameters for ethanol in gasoline.

Sanitation. The reforms in this area addressed issues pertaining to the economic burden caused due to the deterioration in the quality of drinking water. Specifically the reforms aimed at arresting discharges of untreated wastewater in rural and remote communities. As a DPL1 prior action, the government established parameters and procedures for discharge of wastewater in selected agricultural, industrial, commercial activities. As a DPL2 prior action, the government established measures to improve access to potable water and sanitation in rural areas through: (i) regulatory requirements for potable water and sanitation



and domestic wastewater management: and (ii) issued guidelines to the entities requesting financial support from the government for water and sanitation sector investments through Resolution 1063.

Solid waste disposal and reuse/recycling of solid waste. In the years before appraisal, although 91% of the municipal solid waste was disposed through landfills or treatment plants, only 7% of the generated solid waste was recovered and sold by self-employed recycling workers (an informal sector activity). Given that livelihoods of 50,000 people dependent on this activity, the reforms in this area aimed at enhancing capacity for disposing solid waste and reuse/recycling of solid waste. As a DPL1 prior action, the government adopted Resolution 754 in November 2014, which included a methodology for implementing the Integrated Solid Waste Management Plans. As a DPL2 prior actions, the government: (i) through Decree Number 1784 issued in November 2017, updated operational standards for sanitary landfills and set regulations for complementary solid waste treatment activities that were aligned with OECD recommendations: and (ii) through Decree 596 issued in April 2016, defined the operational framework for reuse of solid waste and the rules applicable to waste pickers as formal suppliers.

The pillars were complementary and mutually-reinforcing. While pillar one measures aimed at fostering an institutional setting conducive for addressing environmental considerations in key sectors, pillar two measures aimed at addressing the environmental factors that affect health. Given that the motorized transport modes (pillar one activity) is a key contributor to greenhouse gas emissions, reforms in this area mutually reinforced the reforms of pillar two activity of improving air quality.

However, there were some shortcomings. The outcomes of the national reforms supported by this operation (transport and sanitation sectors), could be undermined by non compliance or inadequate enforcement at the subnational level. Given this, the operation could have benefitted from stronger prior actions aimed at subnational compliance in areas where necessary for realizing the outcomes of the national reforms.

Rating

Satisfactory

4. Relevance of Results Indicators

Rationale

Indicators for Pillar One areas.

Government's green growth strategy. Following the ratification of the Plaza Agreement, the government was expected to establish targets for reducing greenhouse gas emissions through limiting the increase in average global temperature below 2 degrees Celsius by 2030, and adopt actions for climate change adaptation.

Transport sector. The policy reforms area were expected to increase the number of journeys through public transport and non-motorized transport modes relative to the baseline, in selected cities (Barranquilla, Bucaramanga, Medellin, Bogota-Soacha, Cali, Cartagena, Pasto and Monteria).



Energy sector. The policy reforms were expected to: (i) increase funding for FENOGÉ for undertaking programs aimed at promoting non-conventional renewable energy sources: and (ii) increase in the number of beneficiaries with access to energy in areas not connected by the national interconnected system.

Environmental Health. The reforms in this area were expected to develop a model (software and hardware) for the Pollutants Release and Transfer Registry (PRTR) (a web based public information system that provides data on the source, nature, quantity and transfer of hazardous chemicals to the environment).

Forest management. The policy reforms were expected to increase the number of projects under the Forest for Peace program and increase in the number of early warning reports on forest cover each year, relative to the baseline.

Indicators for Pillar two areas.

Air quality. The policy reforms were expected to contribute to percentage reduction in the mean annual concentration of PM_{2.5} in the prioritized monitoring stations in the cities of Medellín, Itagüí, Le Estrella and Bogotá.

Sanitation. The policy reforms in this area were expected to: (i) increase the number of people with access to improved water services relative to the baseline in rural areas: and (ii) increase the rate of treated wastewater from the hydrocarbon sector for reuse in agricultural activities..

Solid waste disposal and reuse/recycling solid waste. The policy reforms were expected to: (i) increase in the number of municipalities disposing solid waste in compliance with the legal framework for sanitary landfills relative to the baseline: and (ii) increase in the recycling rate relative to the baseline.

While the results indicators for five policy areas (government's green growth strategy, the transport sector, air quality, sanitation and solid waste disposal and reuse/recycling solid waste) were appropriate for assessing outcomes, key results indicators on areas associated with forest management, environmental health and the energy sector were output-oriented (discussed in section 5) and not sufficiently outcome focused. Given this, the relevance of indicators is rated as moderately satisfactory.

Rating

Moderately Satisfactory

5. Achievement of Objectives (Efficacy)

OBJECTIVE 1

Objective

To support a set of policy and institutional measures for green growth in transport, energy, environmental health and natural resources:



Rationale

1. Green growth strategy.

Outcomes. As required for the Plaza Agreement, the government submitted to the United Nations Framework Convention on Climate Change (UNFCCC), its Nationally Determined Contribution (NDC), and set targets for reducing greenhouse gas emissions for 2030. Following this, the government enacted a climate change law (Law number 1931 of 2018), establishing the inter-ministerial Committee on Climate Change, providing a mandate to create information systems required to implement the NDC and to design an emissions trading system to complement the carbon tax implemented in 2016. The achievement of the development objective in this area is rated satisfactory as the intended results were realized.

2. Transport. The number of passenger journeys through public transportation systems increased from 27% at the baseline in 2015 to 31.4% in 2018, short of the target of 33%. There were no reliable data on the number of passenger journeys through the non-motorized transport mode to assess results. The modal shift towards non-motorized transport mode did not occur, due to a combination of factors, including increased use of motorcycles and limited political will and capacity at the subnational level to implement disincentives for using motorized transport modes. Given the lack of credible evidence to date on journeys through the non-motorized transport mode, the achievement of the development objective in this policy area is rated as moderately unsatisfactory.

3. Energy. The Non-Conventional Energy Fund and Efficient Energy Management Fund (FENOGE) for funding projects non-conventional sources of energy was operationalized with funding 62.1 billion Colombian Pesos (COBs) in December 2018. This represented three times more than the target of 20 COBs. This indicator was output-oriented. The ICR (paragraph 46) provides further evidence of impacts. 14 projects with a total value of COP 14.5 billion are under implementation to date in rural areas, aimed at reducing energy consumption through energy efficiency measures. This was expected to result in savings of 6,800 tons carbon dioxide. As of May 2017, under the National Rural Electrification Plan (PNER), electricity from non-conventional energy sources was provided to 19,837 beneficiaries in rural areas not covered by the national interconnected system, exceeding the target of 8,433 beneficiaries by 135%. Given that the output-based indicator was achieved at 311%, in combination with the additional evidence for the outcome-based indicator on people benefitting from non-conventional energy in rural areas, the impact of the series in the energy sector is rated as satisfactory.

4. Environmental Health. The policy reforms in this area was expected to develop the web-based public information system - the Registry of Emissions and Transfer of Pollutants (RETC), for providing data on the source, nature, quantity and transfer of hazardous chemicals to the environment, that were in line with OECD recommendations. The output-based RETC was established as targeted. While it is possible that the system could have long term positive impacts, given that there was no evidence of actual impact on environmental health when the operation closed, the achievement of the development objective in this policy area was rated as moderately satisfactory.

5. Forest Management. The policy reforms in this area were expected to contribute to the: (i) the number of projects established under the Forest for Peace Program. 27 projects with involvement of environmental entities had been established by December 2018, exceeding the target of five. These projects benefitted 17,555 families and restored 7,405 hectares of forests: and (ii) Four early warning reports on forest cover were produced as compared to two at the baseline, as targeted. While the targets were realized, a more appropriate indicator for policy reforms would have been to access the impact of the series on the protection



of forests as a natural resource, that is, measuring the rate of deforestation. This review concurs with the assertion made in the ICR that the longer-term outcome data assessing the direct impact of the series on deforestation were not achievable within the timeframe of the series and given that other targets were exceeded, the achievement of the development objective in this area was rated as satisfactory.

With achievement of the three policy areas in this pillar rated as satisfactory, one moderately satisfactory and one moderately unsatisfactory, overall impact of policy reforms in this pillar is rated as satisfactory.

Rating

Satisfactory

OBJECTIVE 2

Objective

Improving environmental quality for reducing Particulate Matter 2.5 in the air, strengthening regulations for sanitation and increasing capacity to reuse and dispose solid waste.

Rationale

Air quality. The policy reforms in this area were expected to improve air quality, by reducing the mean annual concentration of Particulate Matter (PM) 2.5. The mean annual concentration of PM2.5 in seven prioritized (due to the high levels of pollution and population) monitoring stations in the cities of Medellin, Itagui, and Bogota fell on average by 24.4% as compared to the baseline, almost five times more than the target of five percent. The performance in this policy area is rated as highly satisfactory, given that the targets were exceeded by 488%.

Sanitation. The policy reforms in this area were expected to: (i) increase in the number of people with access to improved water resources in rural areas: and (ii) increase in the rate of treated wastewater for reuse in agricultural activities. Regarding the first indicator, by December 2018, 8,526,403 people had access to improved water sources in rural areas, as compared to 7,937,296 at the baseline in 2014, marginally exceeding the target by 0.1 percent. Regarding the second indicator, the policy reforms were expected to increase the rate of treated wastewater by 20% by 2018 relative to the 2015 baseline. This target was not realized, due to the delays in the upgrades required for the company's (Ecopetrol) infrastructure wastewater treatment to comply with national standards. Given the positive results regarding sanitation in rural areas and insufficient performance on the reuse of treated wastewater, the achievement of the development objective in this area is rated as moderately satisfactory.

Reuse/recycling of solid waste. The policy reforms were expected to: (i) increase in the number of municipalities disposing solid waste in compliance with the legal framework in sanitary landfills or contingency cells established as temporary disposal sites that are smaller and have less restrictions: and (ii) increase in the recycling rate. Regarding the first indicator, by December 2018, 914 municipalities (out of 1,102 municipalities) disposed their solid waste as mandated, as compared to 874 municipalities at the baseline in 2015. The realized figure represented 99,8% of the target of 916. Regarding the second indicator, the recycling rate increased by 27% (8.4%) to 2018 (10.7%), more than the originally targeted 18% increase from



a 2014 baseline. Given that the outcomes were realized, the achievement of the development objective in this area is rated as satisfactory.

With achievement of one policy area in this pillar rated as highly satisfactory, one satisfactory and one moderately satisfactory, overall impact of policy reforms in this pillar is rated as satisfactory.

Rating

Satisfactory

Overall Achievement of Objectives (Efficacy)

Rationale

Of the eight reform areas for this series, one area (improving air quality) was rated as highly satisfactory and four areas (government's green growth strategy, reforms in the energy sector, forest management and recycling of solid waste) were rated as satisfactory, given that outcomes were either realized or exceeded. Two areas (environmental health and sanitation) were rated as moderately satisfactory in view of the limited outcomes and one area (energy reforms in the transport sector) was rated as moderately unsatisfactory. Taking these ratings into account, overall efficacy is rated as satisfactory.

Overall Efficacy Rating

Satisfactory

6. Outcome

Rationale

The relevance of the prior actions (design) and achievement of the objectives (efficacy) were rated as satisfactory. The prior actions were linked to the objectives, although the design would have benefitted by stronger prior actions in areas where compliance by subnational agencies is necessary for realizing the national-level objectives. The series achieved most of its results (except in the transport sector). Given these achievements, outcome is rated as satisfactory.

a. Rating

Satisfactory



7. Risk to Development Outcome

Institutional risks. Ongoing benefits from several national reforms supported by this operation (such as those pertaining to transport, sanitation and waste management sectors), depend on compliance by subnational agencies. There is risk that the national government's ability to build on the progress made so far could be undermined, due to the limited technical and administrative capacity at the subnational level.

Stakeholder ownership risk. Some reforms supported by this operation (such as on air pollution) depend on cooperation from citizens. The ICR (paragraph 91) notes that while awareness of negative effects air pollution has been increasing, further progress on these reforms could be compromised by lifestyle choices of citizens (such as opting for motorcycles or private vehicles over using public transportation).

Financial risk. Given that reforms aimed at supporting public transportation in cities or increasing access to water, sanitation and energy services in rural services, is contingent upon funding and availability of public resources, sustainability of reforms in these areas might require private sector participation.

8. Assessment of Bank Performance

a. Bank Performance – Design

Rationale

Design was able to draw on the Bank's analytical products, such as the updates of the Country Environmental Analysis and the Advisory Services and Analytical (ASA) work of 2014 (*Policy Note on Environmental Sustainability/Green Growth in Colombia*). The operation was prepared on the lessons from the prior Bank-financed three series environmental DPL series (Programmatic DPL for Sustainable Development). The lessons incorporated included, upfront agreement with the government and development partners on a coordinated accountability framework and a flexible design. The operation was prepared in collaboration with other donors funding complementary activities and with the IMF for macroeconomic policy advice.

The implementation arrangements were appropriate, with the National Planning Department (DNP), responsible for coordination line ministries and national and regional authorities. Several risks were identified at appraisal, including substantial political, governance and weak implementation capacity risks, given the number of ministries and entities involved in the operation. Risk mitigation measures incorporated at design, included dialogue on environmental issues with stakeholders and technical assistance to DNP. With mitigation measures, the overall operation risk was rated as moderate at appraisal (Program Document, page 30). Appropriate arrangements were made at appraisal for compliance with environmental safeguards (discussed in section 9b).

However, there were some shortcomings in design. One, in design and monitoring of the results framework, given that there was no robust data on non-motorized transport modes. and, two, stronger mitigation measures



could have been incorporated at design, for addressing the risk associated with limited capacity at subnational level.

Rating

Satisfactory

b. Bank Performance – Implementation

Rationale

As part of the second operation, the Bank appropriately incorporated prior actions given the changing circumstances (Colombia acceding to the Plaza Agreement, ongoing peace negotiations with the FARC guerilla group and Colombia's aspired accession to the OECD). As discussed in section 2, as part of this operation the Bank included in the Loan Agreement for DPL2, an option for the government to request a CAT bond, to mitigate the effects of natural disasters. The preparation and implementation of this operation were harmonized with the activities of other donors. This aided in elimination of some activities that were funded in parallel by other donors (discussed in section 2). DPL2

There were some shortcomings in implementation. The ICR (paragraph 89) notes that while the relevant sectors from across the Bank were consulted when designing the series, there were challenges for Bank internal coordination across sectors, due to insufficient incentives for cross-sectoral collaboration. Also, while the Program Document of DPL2, acknowledged the importance of incentives for reform implementation at the subnational level (such as promoting mass transit in some cities), this lesson was not incorporated sufficiently into the design of the final operation in the series.

Rating

Satisfactory

c. Overall Bank Performance

Rationale

Although there were some shortcomings both at design and during implementation, overall Bank performance was rated as satisfactory.

Overall Bank Performance Rating

Satisfactory

9. Other Impacts



a. Social and Poverty

The series supported the government's efforts to formalize waste pickers. This helped in improving the working conditions of a highly vulnerable group.

b. Environmental

As part of preparation of this operation, the Bank conducted Policy Strategic Environmental Analysis, to assess whether the policies supported by the DPL, were likely to have environmental impacts. The assessment concluded that significant negative effects were unlikely, and the overall effects of the policy actions were likely to be positive (First Program Document, paragraphs 86-87). The ICR (paragraph 83) notes that given the series focus on environmental issues, there were significant positive effects on environment, forests and natural resources and that additional positive effects are expected, given that environmental concerns have been integrated into Colombia's policy making through the green growth strategy and climate change commitments.

c. Gender

The ICR (paragraph 82) notes that the DPL series, did not identify or monitor gender aspects.

d. Other

According to the ICR (paragraph 84), the DPL series had no significant unintended outcomes or impacts.

10. Quality of ICR

Rationale

The ICR is well-prepared and candidly discusses the issues during preparation. It provides a good rationale for the changes in the second operation, given the changing circumstances. The ICR provides a good analysis of the prior actions and the ratings are consistent with the analysis of prior actions.

While the ICR is well prepared, it could have been more concise. The main body of the text at 36 pages is more than double the recommended length of 15 pages.

a. Rating

Substantial



11. Ratings

Ratings	ICR	IEG	Reason for Disagreement/Comments
Outcome	Satisfactory	Satisfactory	
Bank Performance	Satisfactory	Satisfactory	
Relevance of Results Indicators	---	Moderately Satisfactory	
Quality of ICR	---	Substantial	

12. Lessons

The ICR draws the following three lessons from the experience of implementing this operation, with some adaptation of language.

1. National reform efforts whose success depends to a considerable extent on subnational level structures need to account for the political, financial and technical risks at those levels. The activities associated with promoting non-motorized transport modes in this operation faced obstacles at the subnational level. The lesson from this operation is that, where compliance at the subnational level is required for realizing the national objectives, they should not only be identified, but also mitigated through measures embedded in the design of an operation and supported by prior actions, if need be, aimed at ensuring the compliance of subnational agencies.

2. The design of a reform program should be informed by extensive analytical work. The sound analytical underpinnings, including work conducted by the Bank, allowed the team aided the team to design solid operations.

3. Broad reforms as those supported by the series should be anchored in a widely accepted framework. This operation was aligned with elements of Colombia's National Development Plan for 2014-2018, prepared with comprehensive stakeholder engagement. This ensured the government's commitment to formulating coherent policies and pursuing their achievement supported by this series.

13. Project Performance Assessment Report (PPAR) Recommended?

No