

UNITED NATIONS ECONOMIC COMMISSION FOR EUROPE

Management Response

Evaluation Title:	Review of the case studies of the application of best practices guidance for coal mine methane management		
Period of Review:	1 January 2014 – 31 December 2016		
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Recommendation 1: Strategically, the Sustainable Energy Division should continue using the mixed technical-political approach: the technical level brings together state-of-the-art knowledge, while the political dialogue can stimulate the politics in the UNECE member States to intensify the adoption of the best practices in coal mine industry. For the Division, the Group of Experts on Coal Mine Methane (GoE on CMM) brings tangible results and an added value, strengthening the position of the Secretariat. This recommendation will play an even stronger role in the context of SDGs. It is also likely to gain importance as the biggest coal extracting countries become increasingly open and interested in adopting the best standards in safety and environmental protection.

Management Response:

UNECE accepts the recommendation. GoE on CMM that operates within the framework of the Sustainable Energy Division (SED) and under the supervision of the Committee on Sustainable Energy (CSE) is a platform that facilitates a dialogue among all stakeholders on both, technical, as well as political/decision-making level. The inclusive and multidimensional character of GoE on CMM is a foundation of its success and therefore it is to be preserved.

Follow up actions and responsibilities:

GoE on CMM organized its 12th annual session in October 2017, which gathered technical experts, as well as representatives of the Governments, relevant international organizations (ILO, International Energy Agency, European Commission), private sector, civil society (NGOs) and academia. The meeting followed the long established pattern of being a forum where CMM-related problems are discussed by all stakeholders.

CSE approved the extension of the Group's mandate and workplan for 2018-2019, thus providing a basis for continuation of GoE on CMM's activities in accordance to the previously established mode of operation.

SED will continue its outreach to all stakeholders, engaging with the Governments, relevant international organizations, private sector, civil society actors, and representatives of academia. Below are listed examples of recent and future engagements with relevant stakeholders indicating GoE on CMM's strong attachment to inclusiveness and all-encompassing approach:

- New grant for continuation of the extra-budgetary project provided by the United States Environmental Protection Energy (US EPA) was received.
- The secretariat engaged with the European Commission (EC) exploring opportunities for cooperation. A special attention was given to EC's Coal Regions in Transition Platform, which is built on similar premises as a new SED's cross-cutting project on Modernisation of the Energy Sector. Both initiatives seek to achieve similar goals, but have different geographic focus, which make them complementary rather than competitive.

- The Government of Kazakhstan was approached and expressed its interest in participating in two extra-budgetary projects developed by SED.
- The European Bank for Reconstruction and Development (EBRD) was approached for the purpose of exploring opportunities for financing of, and cooperation in implementation of the a new SED's cross-cutting project on Modernisation of the Energy Sector.
- Imperial College London (ICL) as well as a private sector actors specialized in business modelling were approached. They expressed their interest in participating in a new SEDs cross-cutting project on Modernisation of the Energy Sector.
- The Governments of Russian Federation and Ukraine were approached regarding establishment of the new International Centres of Excellence on CMM in these countries.
- Negotiations with Governments of Turkey, Georgia and Colombia were undertaken following their requests to organize demand-driven capacity building workshops
- GoE on CMM provided its comments to the drafts of new international standards that were
 to be proposed at the 5th plenary meeting of the International Organization for
 Standarization's (ISO) Technical Committee 263. GoE on CMM intervention led to
 abandonment of a standard, which could indirectly undermine the established security
 standards of methane management in underground coalmines. The dialogue and cooperation
 with ISO is to be continued.
- The secretariat and GoE on CMM will participate in the Global Methane Forum (GMF) a
 conference hosted by the Global Methane Initiative (GMI) and gathering practitioners,
 decision-makers, and academicians from all around the world in Toronto in April 2018.

GoE on CMM will maintain its mode of operation, and its inclusive and multidimensional character through engagement with stakeholders and organization of and/or participation in events gathering various audiences and approaching CMM-related matters from different angles and perspectives.

Charlotte Griffiths, Chief of Section and Michal Drabik, Economic Affairs Officer, SED, will ensure the implementation of the actions.

Recommendation 2: GoE on CMM should generate more knowledge applicable to broader extraction industry, in order to sustain the results, given the excellent relevancy and sustainability. This recommendation applies provided that a draft Work Plan of the GoE for 2018-2019, and the GoE on CMM's request for extension of its mandate is approved during the CSE 26th session. The mandate extension should encompass work on the transition of traditional mining companies to become integrated service companies. It should also explore the impact this transition might have on the contributions of the energy sector on sustainable development and possible formal adoption and implementation of the standards. Rec 8 lists several stakeholders to be consulted in this process.

Management Response:

UNECE accepts the recommendation. In order to do so, GoE on CMM needs to either request CSE to expand its mandate and/or engage with other Groups of Experts operating the umbrella of CSE in cross-cutting activities serving a broader extractive industries' community. Regarding the former, it is noted that such a decision is at the CSE's full discretion and needs to be in line with the will of member States. Regarding the latter, the Group's proactive approach has to be matched by the interest of other Groups that are to be partnered with for the purpose of delivering more comprehensive projects, the scope of which extends beyond the current mandate of GoE on CMM.

Follow up actions and responsibilities:

CSE approved extension of the GoE on CMM's mandate and work plan for 2018-2019, thus providing a basis for continuation of Group's activities in accordance to the previously established mode of operation. GoE on CMM together with SED already is and will continue to be active in preparation - and on later stage in implementation - of the cross-cutting project on Modernisation of the Energy Sector, which is to include all Groups of Experts operating the umbrella of CSE.

• The secretariat engaged with EC exploring opportunities for cooperation, giving special attention to EC's Coal Regions in Transition Platform which is built on similar premises

- and seeks to achieve similar goals as a new SED's cross-cutting project on Modernisation of the Energy Sector.
- The Government of Kazakhstan was approached and expressed its interest in participating in two extrabudgetary projects developed by SED.
- EBRD was approached to explore opportunities for financing of, and cooperation in any new SED cross-cutting project on Modernisation of the Energy Sector.
- ICL as well as a private sector actor specialized in business modelling were approached and expressed their interest in participating in a new SED cross-cutting project on Modernisation of the Energy Sector.

When necessary, as stipulated in the 2018-2019 Work Plan of the Group, GoE on CMM stands ready to participate, within the scope of its expertise, in the SED project on Methane Management in Extractive Industry, as requested by CSE. GoE on CMM reviewed, provided comments to, and endorsed a draft document on Principles for Financing Clean Fossil Fuel Projects in the Context of the 2030 Agenda for Sustainable Development prepared by the Group of Experts on Cleaner Electricity Production (GoE on CEP) and the secretariat. GoE on CMM will actively engage in further development of this matter.

GoE on CMM together with the GoE on CEP will prepare a joint session on the role of fossil fuels in electricity production that is to be delivered at the Global Methane Forum in Toronto, April 2018.

GoE on CMM engaged with the Expert Group on Resource Classification (EGRC) to contribute to development of the United Nations Framework Classification for Resources (UNFC) guidelines for the assessment and management of CMM, abandoned mine methane (AMM) and ventilation air methane (VAM) projects. GoE on CMM will remain active in this field.

Charlotte Griffiths, Chief of Section and Michal Drabik, Economic Affairs Officer, SED, will ensure the implementation of the actions.

Recommendation 3: It is recommended to employ a network of "champions" to lead the work on implementing the recommendations created by GoE, a practice frequently observed in policy making. The "champions" would be key political figures in governments of UNECE member States, advocating for legislative changes, eventually involving the mining companies in setting national industry standards.

Management Response:

UNECE accepts the recommendation. Since its creation, GoE on CMM has been working on developing a network of "champions". Currently, the Bureau of GoE on CMM includes nine Government representatives from Bosnia and Herzegovina, Poland, Republic of Serbia, Russian Federation, Turkey, Ukraine and the United States of America. Representatives of the Governments of Bosnia and Herzegovina, and Turkey are new additions to the Bureau. They were elected at the last annual meeting of GoE on CMM in October 2017.

The role of the Government-affiliated Bureau members, among other duties, is to liaise with their respective capitals and advocate for legislative changes reflecting the best practices developed and promoted by GoE on CMM. However, the effectiveness of any such "lobbying" depends on the political situation in each member State, as well as on its political culture and administrative structure. Furthermore, promotion of any CMM-related regulations has become increasingly more challenging due to the negative view of coal adopted by many governments, societies, NGOs and financing institutions. GoE on CMM is also strengthening its ties with governments by creating International Centres of Excellence on CMM (ICE-CMM). The Centres, being autonomous, self-financing entities operating on the one hand under the auspices of GoE on CMM, and on the other hand under the legal system of the host country, involve both public and private sector actors, and thus constitute convenient platforms for engaging with all local stakeholders, including the Governments. ICE-CMMs serve therefore as portals though which GoE on CMM disseminates its information not only to practitioners in the field but also to the regulators and policy makers in the Government entities. In terms of advocating for establishment of relevant industry standards, the burden rests on all members of the Group. Each of them should, within the scope of its expertise

and influence, act towards promotion and implementation of practices and measures recommended by the Group. The secretariat encourages the members of the Group to do so.

Follow up actions and responsibilities:

The Bureau of GoE on CMM together with the secretariat will continue its efforts to identify and engage with relevant actors in both-the coal sector and governments, for the purpose of assuring effective dissemination of the best practices, as well as their incorporation into industry standards and national legislation in UNECE member States.

At the Bureau call on 11 December 2017 the Chair of the Group distributed the duties among the members of the newly elected Bureau and encouraged them to take steps, within the scope of their professional capacity and influence, to increase the visibility of the best practices developed by GoE on CMM in their respective capitals and/or in professional communities in which they operate.

The Bureau of GoE on CMM together with the secretariat continue its outreach to relevant international professional (e.g. ISO, ILO, GMI, IEA Clean Coal Centre), political (e.g. European Commission) and financial (e.g. EBRD) institutions seeking cooperation and assistance with dissemination and implementation of the best practices worldwide (as recommended by ECOSOC in the decision 2011/222).

GoE on CMM has established two International Centres of Excellence on CMM (ICE-CMM) in Poland and in China. Negotiations regarding other Centres in Russia and Ukraine are in progress. GoE on CMM and the secretariat will continue efforts to expand the network of ICE-CMMs. GoE on CMM will continue to oversee and support activities of the existing ICE-CMMs in their dissemination activities, using them as vehicles to influence regulatory authorities to adopt industrial standards consistent with best practices developed by GoE on CMM.

The secretariat undertakes steps to translate the Best Practice Guidance developed by the Group into additional languages, thus increasing it accessibility to practitioners and decision-makers in the UNECE member States. Translation into Russian, French, Chinese, Polish, and Indonesian are underway. Apart from the translation into UNECE official languages, all other translation are being done as in-kind contributions from the private sector actors cooperating with the Group. The secretariat ha also secured extrabudgetary resources for providing translation into other languages that may include Turkish, Spanish, Serbian, Georgian, and Mongolian.

Charlotte Griffiths, Chief of Section and Michal Drabik, Economic Affairs Officer, SED, will ensure the implementation of the actions.

Recommendation 4: Given the rising importance of the private sector for sustainable development (also enshrined in the SDGs), the Division and GoE should frame ways to involve the private sector in enhancing the results of their activities. The partnerships with the private sector could pave the way to adopt (voluntary) industry standards, could further facilitate the knowledge transfer, and could augment extra-budgetary resources.

Management Response:

UNECE accepts the recommendation. The private sector has been a critical part of the GoE on CMM since its formation in 2004. Currently there are several Bureau members representing the private sector. However, it has always been difficult to assure presence of mining companies or mining associations at the annual meetings of GoE on CMM. As the industry faces severe financial challenges and other constraints, it is problematic to convince senior staff representatives to come to Geneva. At the same time, thanks to extrabudgetary resources that allow for organization of fact-finding missions, workshops and seminars in (or in proximity of) various coal mining regions of the world, GoE on CMM has been successful in attracting staff as well as management of mining entities to its events, and hence has been successful in conveying its message to this targeted audience. Following its well established practice GoE on CMM will preserve its inclusive character and will continue its engagement with all stakeholders, including those from the private sector.

Follow up actions and responsibilities:

GoE on CMM has established two International Centres of Excellence on CMM (ICE-CMM) in Poland and in China. Negotiations regarding other Centres in Russia and Ukraine are in progress. The Centres, being autonomous, self-financing entities operating under auspices of GoE on CMM, involve both public and private sector actors, and thus constitute a convenient platform for engaging with all entities operating in the sector. GoE on CMM and the secretariat will continue efforts to expand the network of ICE-CMMs. GoE on CMM will continue to oversee and support activities of the existing ICE-CMMs in their dissemination activities, using them as vehicles to influence regulatory authorities to adopt industrial standards consistent with best practices developed by GoE on CMM.

The Bureau of the Group and the secretariat will undertake efforts to reengage with the World Coal Association (WCA), the World Mining Congress (WMC) and IEA Coal Industry Advisory Board to reinvigorate cooperation, which over the last years has diminished. The Bureau of the Group and the secretariat will discuss other available opportunities of better engagement with mining companies.

Successful development of the sector-wide project on Modernisation of the Energy Sector would provide GoE on CMM with an extraordinary opportunity to engage with all actors operating in the extractive and energy industries. The broad scope and a comprehensive, cross-cutting approach of this project would allow the Group to integrate its objectives into a broader strategy for restructuring of these industries. As a result, the Group would improve efficiency of its actions and sustainability of their effects. To see more about the Group's engagement in the project please see response to *Recommendation 2*.

Charlotte Griffiths, Chief of Section and Michal Drabik, Economic Affairs Officer, SED, will ensure the implementation of the actions.

<u>Recommendation 5</u>: Strengthen internally the Secretariat to enable constant and predictable support services to the GoE. This would require a multi-level approach:

- Staffing: Ensure the senior staff is able to focus on substantial/political work, and the junior staff is sufficient and constantly employed. Ideally, one regular staff should be allocated entirely for the GoE support, to enable work continuity;
- Resourcing: secure sufficient regular budget for the normal functioning of the GoE (e.g. some experts are not able participate in meetings as their organizations do not have enough resources to finance travel), and for the most significant activities agreed in the bi-annual Work Plans;
- Build strategic partnerships with potential donors (governmental / public agencies, mining companies, other private sector representatives) and agree multi-annual budget for the planned activities, in order to increase predictability and planning.

Management Response:

UNECE accepts this recommendation. GoE on CMM requires sufficient human resources in the secretariat in order to efficiently execute its duties. As the Group is growing, which was both, noticed and advised by the evaluator, it requires more secretariat staff support. In addition to administering the core activities of the Group, there is also a need for a staff support in administering the growing network of ICE-CMMs, which need to be supervised and guided, thus requiring constant attention and coordination. Furthermore, there is a growing number of cross-cutting activities requiring planning, preparation and coordination with other Groups of Experts operating under the umbrella of CSE. Finally, there is a set of new projects that the Group will be involved in. One of them, namely the project on Modernization of the Energy Sector, is very complex and has significant potential to grow. It is designed to involve a broad range of internal (Groups of Experts) as well as external (host countries' Governments, industrial operators, financial institutions, modelling institutions) actors. Consequently, provided it proves successful, it would require a secretariat staff on its own.

GoE on CMM cannot operate without sufficient resources. Furthermore, as advised by the evaluator, it should not only maintain its status but also grow in order to assure the relevance and sustainability of its actions and the ensuing results. The current regular budget allocated to the Group is not sufficient to deliver on the recommendations given by the evaluator. Extra-budgetary resources, in turn, are not certain. GoE on CMM and the secretariat managed to assure an extra-budgetary project for the next two years. However, there is no guarantee that more money will be coming after that period, particularly that the Group's main donor (i.e. US EPA) - due to the political situation in the U.S. - may not be in position to continue its support beyond 2019. Furthermore, fundraising is a difficult and time-consuming activity to which, in light of the current staff situation, the secretariat, being preoccupied with its regular administrative duties, cannot devote sufficient amount of time.

Being aware of the above-mentioned limitations, the secretariat managed resources available for the 2016-2017 biennium in a very careful and efficient way. As a result some saving of extrabudgetary funds were made, with the goal of transferring the remaining balance to the following biennium (such action has already been agreed with a donor and is to be executed soon). The savings were possible due to the proactive attitude of the secretariat that assured delivery of certain deliverables at no cost (through in-kind contributions), as well as the generosity of experts who in many instances contributed their time and expertise free of charge. However, sustainability of such a budgetary approach is highly questionable and impossible to be planned in advance (as it is completely dependent on the generosity of the Group's partners, which by no means can be taken for granted).

GoE on CMM and the secretariat actively seek to build partnerships with potential donors. There are a number of initiatives undertaken (e.g. Modernization of the Energy Sector, establishment of ICE-CMM involving private sector partners, engagement with EC, etc.) in order to secure sufficient and long-term financing. However, as previously indicated, there are number of issues (ranging from the difficult situation and bad perception - particularly by the financial institutions - of the coal sector, to not sufficient staff preventing the secretariat from any meaningful engagement in fundraising on a bigger scale) that make this task very difficult.

It is important to note that the regular budget including number of posts available in SED, are beyond the competency either of the GoE on CMM, or SED. While the Group and/or the secretariat may make request in this regard, none of them has any decision-making capacity in this field.

Follow up actions and responsibilities:

The Bureau of the Group and the secretariat will explore available opportunities to increase regular budget resources. Upon agreeing on a strategy, the matter will be brought to the attention of CSE.

SED will discuss organizational (including staff matters) and budget-related issues internally, awaiting the announcement of the Secretary General's (SG) strategy for Economic Commissions. The first of such debates took place at the SED's retreat on 4-5 December 2017. Others are to follow. Upon being informed about the SG's strategy and the ensuing decisions taken by the UNECE Executive Secretary (ES), SED will decide on steps that it is to undertake in order to improve efficiency and financial condition of the Division and its Groups of Experts (including on CMM).

The Bureau of the Group and the secretariat will continue its efforts to build robust relationships with potential donors. The already commenced attempts will be pursued. In December 2017 representatives of the Group and the secretariat will attend an inauguration of the EC's Coal Platform. As the scope of the Platform overlaps to a large extent with the project on Modernization of the Energy Sector, EC is hoped to join the rank of the Group's important partners. Similarly, a follow up discussion of the potential engagement of EBRD in the above-mentioned project is scheduled to take place in December 2017.

The secretariat is planning a mission to Brussels, tentatively scheduled for the beginning of 2018, to discuss a potential for cooperation between SED and EC' Directorate-General for Energy (DG Energy). The discussion will feature a project on Modernization of the Energy Sector and the broad agenda on methane management (including on CMM).

A secondment from the Government of Kazakhstan is currently being explored to provide support on non-regular budget activities.

Charlotte Griffiths, Chief of Section and Michal Drabik, Economic Affairs Officer, SED, will ensure the implementation of the actions.

Recommendation 6: The GoE should initiate a process to establish agreed measuring standards related to its work: incidents / explosions statistics and reporting, measure capture and commercial use of methane, measure the GHG emission reductions; and common evaluation methodologies for all fossil sources of energy. This task has two constraints: a) this type of information is under direct control of safety and environmental bureaus and agencies resident in the member States, and their reliability and comparability would be a challenge; and b) it would be difficult to establish a direct attribution of the GoE's activities to the final results – number of accidents or quantity of emissions; rather it would be a contribution to achieving set targets. The shift from output oriented measuring to outcomes indicators will support the Division and the Group of Experts in presenting more convincingly the results of their work, especially given the international rhetoric related to results based management and the raising importance of the private sector in sustainable development.

Management Response:

UNECE partially accepts the recommendation. The reservation comes from the fact that it is difficult to measure success of the Group's activities quantitatively. Furthermore, as was observed by the evaluator, there is also an issue of setting up reliable indicators allowing for proper assessment of the obtained results. The later pose difficulties because it is virtually impossible to identify and control all other variables that may have impact on the final outcome. For example, if in the year following a workshop organized by GoE on CMM in a given country the methane outburst accident rate drops, it is impossible to precisely assess to what extent the Group should be credited for it, without knowing all details of the situation on the ground (including, its political, regulatory, technical, economical, geological and social aspects).

At the same time, adoption of a more result-oriented approach to measuring the Group's impact would not only provide a better picture of the Group's value, but would also allow the Group to present its achievements in a better, more convincing manner, thus allowing it to gain more recognition and support (also in financial terms). There are states, (e.g. Ukraine), which adopted a number of regulations based on the best practices developed by the Group (as indicated by the Ukrainian representative on the Bureau). Similarly, as a direct consequence of a workshop in Ranchi (March 2017) organized by the Group on the invitation from the Government of India, the latter issued the Policy Framework for Early Monetization of Coal Bed Methane. While the debate on this matter in India has been going on for a long time, the event gave the decision makers a necessary final push, which lead to the development of this regulation. Consequently, as indicated by these examples, it is possible to point to tangible effects of the Group's activity. However, it is impossible to quantify the Group's actual involvement in their achievement.

Furthermore, in order to know about all what follows the Group's activities or what derives from its work, the secretariat would have to engage in some sort of investigative/tracking activity, which it is nether prepared (in terms of staff, resources and expertise), nor mandated for. Some results are very direct (in terms of time and effect) and easily linked to the GoE. Others are associated with the Group more loosely (being a combination of multiple variables, or occurring long after the Group's involvement). About some the Group is informed (as evidenced by the Ukraine and India examples that were brought to the Group's attention by local experts involved in the Group's activities). Other results may accrue but are not communicated to the GoE or the Secretariat. Consequently, while on a conceptual level UNECE agrees with the recommendation, on a practical level it does not currently see a possibility of its proper implementation. However, the Bureau of the Group together with the secretariat will give the issue a thought and will attempt to set at least few quantifiable indicators of its effectiveness.

Follow up actions and responsibilities:

The Bureau of GoE on CMM and the secretariat will develop indicators allowing for measuring in quantifiable way the results and effects of its work. The issue was discussed at the GoE on CMM's Bureau call on 14 December 2017. For each of the activities stipulated in the 2018-2019 Work Plan,

the Bureau of the Group and the secretariat will establish a set of specific (where possible quantifiable) indicators, allowing for measuring effectiveness of the Group's actions.

The Bureau of GoE on CMM and the secretariat will undertake efforts, within the scope of their capacities and mindful of time constraints, to obtain from intended beneficiaries (i.e. member States and/or other entities) data indicating direct and indirect impact of the Group's activities.

Charlotte Griffiths, Chief of Section and Michal Drabik, Economic Affairs Officer, SED, will ensure the implementation of the actions.

Recommendation 7: The GoE should initiate a process to establish agreed measuring standards related to its work: incidents / explosions statistics and reporting, measure capture and commercial use of methane, measure the GHG emission reductions; and common evaluation methodologies for all fossil sources of energy. This task has two constraints: a) this type of information is under direct control of safety and environmental bureaus and agencies resident in the member States, and their reliability and comparability would be a challenge; and b) it would be difficult to establish a direct attribution of the GoE's activities to the final results – number of accidents or quantity of emissions; rather it would be a contribution to achieving set targets. The shift from output oriented measuring to outcomes indicators will support the Division and the Group of Experts in presenting more convincingly the results of their work, especially given the international rhetoric related to results based management and the raising importance of the private sector in sustainable development.

Management Response:

UNECE accepts the recommendation. In accordance with the 2018-2019 Work Plan, GoE on CMM committed itself to development of a standard training module on best practices in the abatement, recovery, and use of methane from coal mines. Once the module is created, a proper application strategy aligned with its scope and the level of complication, will be developed by the Bureau of the Group and the secretariat. Should the module require a training of trainers, such training will be organized, subject to availability of funds, where possible and appropriate in cooperation with ICEs. It has to be remembered, however, that training trainers require considerable funds that are not available in the regular budget. Neither is such activity within the scope of the extra-budgetary project for 2018-2019. Due to limited human and financial resources GoE on CMM is not able undertake all necessary activities simultaneously. Consequently, in the upcoming biennium it will develop the training module. Training of trainers, will constitute the following step, delivery of which, being dependant on too many factors, is currently impossible to be placed in time.

Follow up actions and responsibilities:

A standard training module on best practices in the abatement, recovery, and use of methane from coal mines will be developed in the 2018-2019 biennium.

Once the training module is created, GoE on CMM and the secretariat will undertake necessary steps (including on securing funding) to develop a proper application strategy, aligned with the scope and the level of complication of the module. Where possible and appropriate GoE on CMM will work on this issue in cooperation with ICE-CMMs. Where appropriate GoE on CMM will also reach out to relevant academic and scientific institutions in order to explore usefulness and possibility of their involvement in this task.

Charlotte Griffiths, Chief of Section and Michal Drabik, Economic Affairs Officer, SED, will ensure the implementation of the actions.

Recommendation 8: To maximise sustainability, consider a more focused engagement with technical community, policy makers in UNECE member States, other UN System organizations, financial markets, private sector, NGOs. It is important to bring all stakeholders to dialogue, to establish common action plan and to create the legal frameworks within the UNECE member States. For the European Union Member States, it would make sense to create a strategic partnership / technical involvement of the EU bodies responsible with energy resources, to include best practices in the national legislation.

Management Response:

UNECE accepts the recommendation. GoE on CMM is an all-inclusive platform uniting all stakeholders (please see also a response to *Recommendation 1*). The Group has developed a set of best practices that, following an ECOSOC decision (2011/222) it disseminates and promotes worldwide. Recognition and application of best practices developed by the Group is voluntary; it neither requires a Group's involvement, nor does it entail any verification or enforcement mechanism. Should member States be interested in developing stronger legal framework in this field, GoE on CMM and UNECE stand ready to accommodate their need. Engagement with EU is subject to the interest of the latter. In the current situation in which EU approaches coal-related issues with great caution, and is rather hesitant to introduce further regulations in any field, the proposed joint regulatory activity might be very difficult to implement.

Follow up actions and responsibilities:

The Bureau and the secretariat touched upon issue at the GoE on CMM's Bureau call on 14 December 2017 and decided to discuss it further at the upcoming Bureau call in January 2018. By then Members of the Bureau will undertake efforts to evaluate the position of their respective Governments on this issue.

Should the Bureau of the Group so request, the secretariat will engage with member States to gauge their interest in developing a legal instrument (e.g. a convention) regulating matters encompassed by the mandate of GoE on CMM. In case there is interest from member States to proceed with development of a legal instrument in the field of CMM, GoE and the secretariat will engage with the EU in order to explore a possibility of issuing a unified joint regulation.

Charlotte Griffiths, Chief of Section and Michal Drabik, Economic Affairs Officer, SED, will ensure the implementation of the actions.

Recommendation 9: It is advisable for the Division to include a stronger Results Based Management approach when creating project documentation and reports. This would make the results easily understandable to stakeholders, thus increasing credibility and evaluability. In turn, the future evaluations will have a stronger internal and external validity.

Management Response:

UNECE accepts the recommendation. Where possible the Secretariat will try to adopt more results-oriented approach. However, it largely depends on developing indicators appropriately measuring the results achieved by GoE. The difficulty of this task was discussed in response to *Recommendation 6* (please see above). Furthermore, many documents developed by the secretariat for the Group follow the established UN pattern and therefore their alteration is beyond the competence of the Division.

Follow up actions and responsibilities:

While developing project documentations and reports, the secretariat, where possible, will give more focus to detailed description, in a measurable and quantifiable manner, of the expected or achieved results. In this context, please also see *Follow up actions and responsibilities* in response to *Recommendation 6*.

Charlotte Griffiths, Chief of Section and Michal Drabik, Economic Affairs Officer, SED, will ensure the implementation of the actions.

