

**Evaluation of DFID
Development Assistance:
Gender Equality and Women's
Empowerment**

**Phase II Thematic Evaluation:
Enabling Environment for
Growth and Investment**

Caroline Pinder

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Disclaimer

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Foreword

BY MARK LOWCOCK,
DIRECTOR GENERAL FOR CORPORATE
PERFORMANCE AND KNOWLEDGE SHARING



DFID recognises gender equality and the empowerment of women as essential both for the elimination of world poverty and the upholding of human rights. Since 1985, we have worked to support this area, as laid out in our Strategy Paper¹.

In 2005, the international community will consider progress towards the Millennium Development Goals (MDGs). Many of the hardest-to-reach MDGs are related to gender. Two examples are the goal to reduce deaths in pregnancy and childbirth, which are still unacceptably high, and the goal to increase girls' education, which has been shown to have many positive knock-on effects including on child health and on economic growth.

2005 also marks the 10th anniversary of the Beijing Declaration and Platform for Action. World leaders will be meeting in March to consider progress towards the goals identified in Beijing.

As a contribution to this renewed effort, DFID is currently conducting an evaluation of its policies and practice on gender equality and women's empowerment. The evaluation will provide independent and systematic evidence of the effectiveness of DFID's contribution to international gender equality goals. It will draw lessons from experience to inform our future strategy.

This is one of a series of working papers produced in preparation for the main evaluation. These are rapid reviews and provide indicative evidence on eight thematic areas of DFID's work:

- Voice and Accountability;
- Maternal Mortality;
- Gender Violence;
- The Enabling Environment for Growth;
- Education;
- Conflict and Post Conflict Reconstruction;
- HIV and AIDS; and
- Migration.

Any feedback on this paper should be addressed to Jo Bosworth in Evaluation Department.

¹ Poverty Elimination and the Empowerment of Women. This is currently being reviewed and updated.

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Definitions of Key Terms

Gender Equality

Women having the same rights and opportunities in life as men, including the ability to participate in the public sphere.

Women's Empowerment

A process of transforming gender relations through groups or individuals developing awareness of women's subordination and building their capacity to challenge it.

Gender Mainstreaming

A strategy to ensure that women's and men's concerns and experiences are integral to the design, implementation, monitoring and evaluation of all legislation, policies and programmes in any area and at all levels.

Twin Track Approach

DFID's strategy combining focused actions aimed at women's empowerment and gender-aware actions in the mainstream of development work.

Evaporation

When good policy intentions fail to be followed through in practice.

Invisibilization

When monitoring and evaluation procedures fail to document what is occurring 'on the ground'.

Resistance

When mechanisms are used to block gender mainstreaming based on 'political' opposition (itself embedded in unequal gender power relations) rather than on 'technocratic' procedural constraints.

Sources: Adapted from Reeves & Baden (2000); Moser et. al, (2004); DFID (2000); and Darbyshire (2002).

Executive summary

S1 Economic growth is seen as the driving force behind achievement of the Millennium Development Goal (MDG) to halve by 2015 the number of people living in extreme poverty. Research has consistently shown, however, that economic growth on its own is not enough to reduce poverty. Economic growth must favour the poor. It must be linked to policies that reduce inequality, in particular policies that equalise access to markets and economic resources. An objective of enabling environment policies should be to promote that equality of access and take up of opportunities.

S2 All international agencies now recognise the need to promote gender equality and women's empowerment, not just on human rights grounds, but because it makes economic sense. Gender inequality lowers the productivity of labour and intensifies the unequal distribution of resources. It also lowers the quality of life for men and women.

S3 DFID's work, and in particular its economic reform work, is driven by the MDGs. From this study it seems that DFID's enabling environment programmes have tended to focus on economic growth as the prime goal and assumed the benefits of growth will be equally distributed between men and women. This has not been the case, and DFID appears to have lost an opportunity to make its case for gender equality either within its own programmes, or with country partners and multilateral agencies.

Focus of evaluation

S4 This evaluation defines and draws out issues to be taken into account in assessing gender mainstreaming in DFID's enabling environment interventions. It puts forward some hypotheses, frameworks and methodologies for conducting a systematic assessment of the outcomes and impacts of DFID's gender mainstreaming strategies.

Approach and Methodology

S5 Integration of gender policies and strategies in Enabling Environment (EE) reforms can be explored in the context of three development paradigms and the linkages between these:

- economic growth: gender-blind, assumes women's special economic constraints will be dealt with in the process of general economic reform
- poverty alleviation: a welfare approach that treats poor women and men as a homogenous group, and subsumes women's special constraints
- women's economic empowerment: focuses on eradication of economic resource and power inequalities between men and women.

S6 DFID EE programmes contain three core elements:

- legal and regulatory framework
- policy framework
- institutional and organisational framework.

This study considers an overview of DFID's EE work and documentation from a sample of DFID's EE projects and programmes. It goes on to suggest hypotheses about DFID's EE programmes to be tested in the later, systematic evaluation.

Key findings

S7 There are a number of findings:

- DFID's economic reform work is driven by the Millennium Development Goals (MDGs). However, the Beijing Strategic Objectives form a more comprehensive basis for rigorous analysis of gender issues in the context of economic growth and reform programmes.
- Based on DFID statistics and a sample of documentation from its EE programmes, gender equality is being sidetracked and is receiving less attention now than it was eight years ago. Only 8% of DFID's EE programmes over a 10 year period have a principal or significant gender commitment marker.¹ The number of programmes with an economic focus and a gender marker has declined from 111 in 1997/8 to 25 in 2003/04. However, concerns over data quality mean this finding should be further investigated.
- DFID's EE programmes have tended not to focus on areas where women have a significant interest (micro and small enterprise development, advocacy of small business' concerns, labour laws, commercial justice issues, such as land title).
- DFID appears not to have made the most of its strong position as a major donor to influence negotiations with multilateral agencies and partner governments.

Key recommendations

S8 The full evaluation should investigate two perspectives:

- the process by which gender has (or has not) been integrated into enabling environment programmes, and how it has been treated within those programmes
- the outcomes of enabling environment programmes in terms of impact on gender equality and women's empowerment.

S9 The 'quick and dirty' findings of this preliminary review suggest there are two underpinning hypotheses that need to be tested:

- that (by and large) gender has not been integrated into enabling environment programmes, and nor is it likely to be if programme focus and logic continues as now to be driven principally by unconditional economic growth. Also, that when it is integrated it is usually confined to the context of poverty alleviation and treats poor women and men as homogenous groups, due to: change in aid modalities and funding; and lack of institutional capacity in the light of these changes at both country and policy division levels

¹ Markers are used to indicate policy objectives. Programme documents mark whether Gender Equality is a Principal (P) or Significant (S) objective; or there may be no mark at all against the Gender Equality objective.

- That DFID's EE programmes (by and large) have not had an impact (or sufficient impact) on gender equality and women's empowerment, and are unlikely to contribute to achievement of the MDG target to halve poverty by 2015, due to: women's issues are not adequately dealt with in models that promote economic growth without reducing inequality; lack of, or inconsistency in use of gender and social exclusion analysis related to poverty reduction at all stages of programme design, implementation, and evaluation.

1 Introduction

1.1 This study is one of a suite of eight thematic reviews (see preface). Its objectives are:

- to summarise briefly international and DFID policy objectives in the enabling environment, and links to international and DFID policy on gender equality
- to catalogue and describe DFID strategies on gender mainstreaming and women's empowerment in enabling environment work, focusing on a sample of DFID interventions in this field
- to discuss the outcomes, impact and contribution of the sample of DFID interventions, including contributions to regional and international efforts
- to set the scene for the main gender evaluation (see Preface) by suggesting plausible hypotheses of links between interventions, outcomes, influence and impacts, setting out a framework for more detailed evaluation, and commenting on methodologies, availability and quality of information for the task.

1.2 The methodology comprised:

- desk review of DFID policy and operational documents
- meetings and telephone discussions with key informants in DFID Head Office, as well as email correspondence with others in country offices
- programme tracer studies: review of documentation of a sample of programmes regarding the actual outcomes and impacts of programme reviews measured against their Performance Reporting Information System Management (PRISM) gender marker.

2 International policy objectives in the enabling environment and links to policy on gender equality

2.1 The business enabling environment in international policy objectives

2.1 Pro-poor economic growth is seen as the driving force behind achievement of the Millennium Development Goals (MDGs). Pro-poor economic growth depends upon development of a robust private sector, which in turn depends upon governments establishing an environment that enables business to innovate, thrive, compete and pursue new market opportunities.

2.2 Rich and poor alike participate in the private sector: as shareholders of multi-national businesses looking for new areas of investment, to employees of those companies and consumers of their products; as proprietors and employees of small and micro enterprises, and as poor subsistence farmers looking for markets in which to sell their excess produce for cash to buy non-food essentials. Strategies which reform the business environment and promote economic growth based on a thriving private sector, therefore, are of potential benefit to everyone. But the degree to which people benefit from economic growth and reform processes will depend largely upon the way in which those benefits are distributed across the population, and the differentials in people's capacity to access and utilise the essential requirements for successful enterprise (eg capital, land, skills, markets). Amongst the factors which affect distribution and access to the benefits of economic growth are gender, caste, ethnicity and age.

2.2 Interrelation between gender, enabling environment programmes and economic reform

2.3 As with many other aspects of development, economic transformation is experienced differently by men and women. For example, the break up of the command economies of the Former Soviet Union nations, which led to such a hasty and inequitable disposal of state assets through a process of privatisation that it has been nicknamed the 'wild east', produced an almost exclusively male oligarchy that women found almost impossible to enter. Indeed many women found they were left with only the unprofitable parts of state enterprises, in particular on the farms where most of them were reduced to surviving on subsistence levels of agriculture. But it was not only women who were negatively affected: it has been estimated that up to a third of a million excess premature deaths amongst men in those countries has been due to alcoholism and suicide as a result of finding themselves without work or employed status.²

2.4 Similarly, in developing countries, market-led reforms have had a different impact on men and women. For example, in many countries in Southern Africa where decisions regarding land use are largely in the hands of men, encouragement by governments of export-driven growth supported by reform of tariff structures and relaxing of regulations, has resulted in an increase in cultivation of non-food crops (e.g. tobacco, cotton, flowers) at the expense of staple food crops which tend to be favoured by women. Amongst households with insufficient food stocks to begin with, this has led to a deepening of poverty

² World Bank (2002) "Transition: the first ten years"

in many rural areas that is felt most keenly amongst women and girls whose health often deteriorates from working long hours to meet food needs as well as their menfolks' cash-cropping targets. On the other hand, there are a few women (mainly in urban areas in an equally few African countries) who have been able to find new sources of income as a result of economic liberalisation, for example by informal trading in imported goods such as second-hand clothes. The downside of this particular trade, however, has often been the loss of jobs in these countries' textile and garment industries which has affected men more than women, as it is men who are more likely to be employed in the formal sector.³

2.5 The point of these examples is to highlight the complexity of enabling environment reforms and the varied impacts they can have on women and men depending on social and cultural context. Business regulatory reform and other private sector development programmes are also multi-dimensional, crossing economic, political, legal and social boundaries. And, most importantly, they can impact on citizens in all sorts of uneven, unforeseen and unintended ways. The fact that poverty is not reducing in most developing and transitional economies despite increased growth rates in some of them, and that women continue to form the majority of the world's poor, suggests there is a link between continuing poverty levels, the different economic roles assigned to women and men, and the type of reform programmes being implemented. It is now generally accepted that pro-poor economic growth and development is unlikely to be achieved unless differential gender impacts are taken into consideration in the design and implementation of economic reform and enabling environment programmes.

2.6 Many international agencies' enabling environment programmes do now attempt to incorporate in their design an awareness of the impacts that gender relations can have on the outcome of a programme, and in turn the different impacts that such programmes can have on men and women. To date, however, there have been no comprehensive studies aimed at evaluating gender equality policies and strategies within enabling environment reform programmes. There has tended to be an assumption that economic reform must necessarily benefit everyone alike, with insufficient attention being paid to disaggregating impacts by gender – or by other potentially exclusionary factors for that matter, such as age, ethnicity and caste. Disaggregation of data by gender and development of gender-focused frameworks for analysis of that data are critical to improving understanding of the multi-dimensional consequences that enabling environment reform programmes can have on gender equality and women's empowerment, poverty reduction and pro-poor growth.

2.3 Gender perspectives in development of an enabling environment for economic growth and investment

2.7 Integration of gender policies and strategies in Enabling Environment (EE) reforms can be explored in the context of three development paradigms, and the linkages between these.⁴

³ This was the case in Zimbabwe in the mid-1990's, where several large textile factories were closed due to importation of cheaper fabrics and second hand clothes, and these factories employed mostly men. Conversely, in Bangladesh the majority of workers in the textile and garment sector are women, and it is feared the ending of the Multi Fibre Agreement in 2005 will cause large scale unemployment amongst low-skilled and low-paid women workers.

⁴ For more detailed treatment of these paradigms please see Mayoux, L (2002) "Jobs, Gender and Small Enterprises: Getting the Policy Environment Right," SEED Working Paper No 15, ILO, Geneva

Economic growth

2.8 This first paradigm assumes the benefits of growth will be gender-neutral or gender-inclusive, and that women and men will enjoy the same benefits of employment creation and generation of market opportunities. It also assumes that women's specific concerns and constraints will be managed within the context of general business regulatory reform and that there is no need for special provision.

2.9 However, it is evident that it is not the case, either that impacts on both sexes are similar, or that gender-based concerns and constraints are likely to be tackled within a context of general economic reform. Indeed it has been argued that macro-economic approaches to development are not just gender-neutral but are actually gender-blind, and that international targets for poverty reduction will not be reached unless gender is placed at the heart of development. It is evident (for example, from research by Klassen and others)⁵ that the achievement of *pro-poor growth* requires parallel attention to both economic growth *and* reduction in inequality. It has been suggested that high inequality countries will need to grow twice as fast as low inequality countries if poverty is to be halved by 2015.⁶ Achievement of pro-poor growth therefore depends in large part upon understanding, and acting on, gender differentials in economic reform processes.

2.10 Gender inequality limits the pro-poor impacts of economic growth because it contributes to poor people's vulnerability to shock in periods of macro-economic transformation and insecurity. Although it is women who are likely to be the most vulnerable and therefore most likely to be negatively affected by changes in economic institutions, this is not always the case as was evident from the break up of state enterprises in the FSU in which men as well as women lost their jobs, and the extent to which they were each able to adapt their skills to new labour markets.⁷

2.11 Vulnerability is not just about cash income and formal employment. It is also affected by the unequal distribution of non-cash assets and lack of capacity to respond to alternative markets and opportunities. This vulnerability goes deeper than reform of economic institutions and is affected by social and cultural structures and norms which are more likely to affect women than men. For example, women's legal status may impede them from owning or renting land, raising capital, or they may be restricted from travelling outside their village, or attending school or acquiring new work skills.

2.12 Another way in which purist macro-economic growth and market approaches to development may be hindered by a failure to adequately address gender is the lack of incentives they may offer women (in particular, but also men in some circumstances) to take advantage of market opportunities. For example, women faced with having to work on both non-food and food crops may well choose to give more time to the latter even though their household income levels could potentially increase if they chose to spend more time on non-food cash crops. This occurs if women think they are unlikely to see any

⁵ Klassen, S (Nov 2004) "Pro-poor growth and gender: what can we learn from the literature and the OPPG Case Studies". This paper links economic growth with inequality reduction, and cites cross-country evidence that has shown inequality in education and wage levels reduces economic growth.

⁶ Hanmer, L, Healey, J, & Naschold, F (July 2000), "Will growth half global poverty by 2015?" ODI, UK

⁷ World Bank (2002) "Transition: the first ten years"

benefit for themselves or their children from the extra income. In this way the pricing mechanism, which is generally seen as the key driver of markets, fails to provide the incentive for them to switch their labour to higher value crops. Failure to analyse and deal with gender inequality in the context of macro-economic policies will therefore limit the effectiveness of growth on poverty reduction in the long-term, even if there may be some limited gains in the short term.

Poverty alleviation

2.13 Recognition that women are more economically disadvantaged than men but take greater responsibility for the wellbeing of their family has meant that pro-poor policies and strategies are usually targeted towards women on welfare grounds. Within this paradigm a focus on women and gender policies is justified in terms of benefits to poor men as well as poor women. However, with this approach there is a danger that women's special economic constraints will be subsumed within a poverty and welfare framework, rather than mainstreamed into macro-level economic growth policies. It also assumes homogeneity of constraints on women (and poor men), and absence of differentiation in women's and men's situations and their capacity to deal with those constraints.

2.14 Poverty Reduction Strategy Papers (PRSPs) which form the basis, or at least a central part, of most donors' country programmes, tend to view gender issues within this welfare, poverty alleviation perspective, rather than within a mainstream economic focus. In PRSPs the discourse on gender is usually confined to a separate section, in which women's particular vulnerability to economic transformation is commonly lumped under 'female headed households', whilst poor male headed households are usually classified under 'rural and low-skilled' households.

2.15 Poverty analysis in PRSPs is often limited to descriptions of poverty in terms of cash and capital assets in the context of the sustainable livelihoods framework (eg cultivatable land per household, per capita income from non-agricultural sources etc). Also, the focus of that poverty analysis tends to be on the household rather than looking at intra-household poverty and power relations *within* households. Rarely is attention given to the deeply embedded economic, political, social and cultural conditions and processes that underlie unequal gender relations, and that explain the different reasons as to why men and women are poor.

2.16 The range of solutions to vulnerability caused by economic transformation that are most commonly proposed in PRSPs at the macro level include safety nets and welfare transfers targeted at female headed and other vulnerable households. Again, the underlying differences in access to economic resources and power relations are rarely tackled. Similarly enabling environment programmes are rarely linked directly to poverty alleviation. Rather they are contained in the early sections of the PRSP that deal with macro-economic growth through trade liberalisation and development of the larger firms in the private sector. At micro-level the poverty alleviation focus is operationalised through projects that aim to lift a particular group of poor women out of poverty through, for example, provision of microfinance and business development services in a specific locality.

Women's economic empowerment

2.17 This approach aims to eradicate economic resource and power inequalities between men and women by dealing with women's strategic as well as their practical needs. The focus on women (specifically) is justified in terms of the direct benefits the programme will bring to women (rather than what benefits it can also bring to men). It operates at deeper cultural, social, political and institutional levels as well as at the front-line economic level. Empowerment policies are usually operationalised in the context of human rights programmes that target factors of social exclusion and are aimed at eradication of gender inequality at all levels and in all spheres. The aim is to increase women's bargaining power so they can negotiate economic, social and political changes for themselves.

2.18 However, in programmatic terms this focus has tended to be operationalised through a project approach, targeting specific groups of women with a particular type of intervention, often becoming synonymous with the narrower 'women in development' (WID) approach and thereby losing some of its strength as projects are rarely able to achieve strategic change. Micro-finance has been the most popular enterprise development tool for women's empowerment, often supported by business skills training. Whilst these projects have brought benefits to participants, it has been found that they are often hard to scale up, or to extend beyond the project's local boundaries.⁸

Linking the three paradigms

2.19 The diagram on the next page brings together the three paradigms, and shows how they all need to work together in order to achieve sustainable and pro-poor growth that is based on reduced inequality (that is, gender and other forms of inequality).

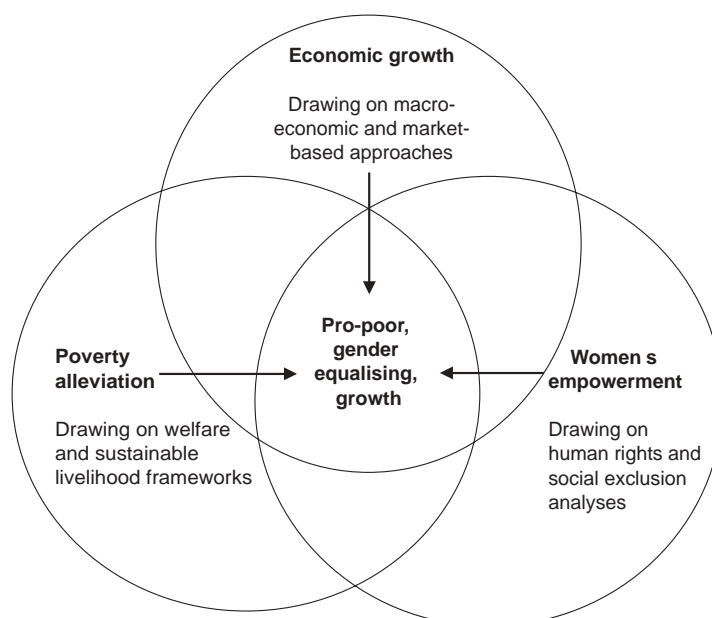


Diagram 1 Triple-focus analysis of gender in the enabling environment

⁸ The Gender TSP makes the point that: "little can be achieved in the long term by focusing only on small-scale activities. While these bring direct benefits to many people they rarely bring about lasting, strategic change unless they are linked to and complement, policy development." (p21-22)

2.20 Currently the international approach to gender issues in enabling environment programmes is in terms of the economic growth (primarily) and poverty alleviation/reduction (secondly) paradigms. In general, enabling environment programmes pay little direct attention to empowerment of women: this is expected to occur naturally as an offshoot of economic growth. To be effective, however, mainstreaming of gender policies in the context of economic reform has to draw on all three paradigms, with gender analysis taking place at all stages of the programme cycle, from appraisal and design through to monitoring and long-term assessment of impact. It is also necessary to accommodate social, economic and cultural diversity within that analysis, and to recognise that in some situations poor women may have more in common with their male compatriots than they do with rich women in their particular country or sector of economic activity, whilst in other contexts women's special needs have to be addressed directly. Detailed gender and social exclusion analysis should also be undertaken at all stages, in particular at appraisal and design, in order to avoid the type of unforeseen and unintended impacts described in the earlier examples from enabling environment programmes.

2.4 Linking gender perspectives to the international policy forum

2.21 Together the three paradigms described above provide a conceptual framework for analysing broad impacts of gender mainstreaming in the context of business regulatory reform and enabling environment programmes. Separately each paradigm provides a lens through which to look at impacts in a more focused manner.

2.4.1 Gender and enabling environments and the MDGs

2.22 In practical terms, however, application of the macro-economic approach to global development by multi-lateral and bi-lateral donors has dominated interventions in recent years, and as a consequence supported to a large extent the assumption that economic growth benefits women and men equally, ie the economic growth paradigm. Dominance of this paradigm may account for the narrow indicator that is used in the MDGs to measure changes in women's economic position solely in terms of their share in non-agricultural wage employment, ie creation of jobs in the formal sector. In fact the majority of women in developing countries are engaged in informal sector activities,⁹ and whilst employment of women in the formal sector may have increased with liberalisation of trade and investment, this employment is often poorly paid and does not adhere to international labour standards.

2.4.2 Beijing Platform for Action

2.23 Section F of the *Beijing Declaration on Gender and Economic Policy (Women and the Economy)* provides a clear framework for how women's economic empowerment can be achieved through a number of strategic objectives. These provide a far wider and more inclusive guide than the MDGs for assessing how effective gender mainstreaming policies have been in the context of enabling environment programmes. The section lists six strategic objectives, for each of which in turn there is a set of detailed actions and strategies which could be used as indicators against which to assess achievement:¹⁰

⁹ Two-thirds is often cited (eg World Development Report 2005, Overview) but it varies by country and region, generally lower in transition economies and higher in many Sub-Saharan Africa countries.

¹⁰ See www.un.org/womenwatch/daw/beijing/platform/economy.htm for full transcript of section F

- promotion of women’s economic rights and independence, including access to employment, appropriate working conditions and control over economic resources
- facilitation of women’s equal access to resources, employment, markets and trade
- provision of business services, training and access to markets, information and technology, particularly to low-income women
- strengthening of women’s economic capacity and commercial networks
- elimination of occupational segregation and all forms of employment discrimination
- promotion of harmonization of work and family responsibilities for women and men.

2.4.3 DFID’s gender and enabling environment policies in relation to the international targets

2.24 As mentioned earlier, DFID’s work, and in particular its economic reform work, is driven by the MDGs¹¹ although the Beijing Strategic Objectives form a more comprehensive basis for rigorous analysis of gender issues in the context of economic growth and reform programmes. Table 1 compares DFID’s policy framework with the MDGs and the Beijing Strategic Objectives:

Table 1 Comparative overview of DFID and international policy frameworks for gender and economic reform

<p>MDG 3</p>	<p>To promote gender equality and empower women</p> <p>indicator = share of women in wage employment in the non-agricultural sector</p>
<p>Beijing PfA</p>	<p>To eradicate inequalities in economic opportunities and access to resources, by:</p> <ul style="list-style-type: none"> • promotion of women’s economic rights and independence, including access to employment appropriate working conditions and control over economic resources • facilitation of women’s equal access to resources, employment, markets and trade • provision of business services, training and access to markets, information and technology, particularly to low-income women • strengthening of women’s economic capacity and commercial network • elimination of occupational segregation and all forms of employment discrimination • promotion of harmonization of work and family responsibilities for women and men.
<p>DFID (from Target Strategy Paper ‘Poverty elimination and the empowerment of women’)</p>	<p>To secure greater livelihood security, access to productive assets and economic opportunities for women as well as men, measured by:</p> <ul style="list-style-type: none"> • larger share and control for women of earned income, household income, and assets • changes in land and other laws relating to women’s property and tenure rights • development of more gender aware approaches, tools and methods, for infrastructure development • core labour standards adhered to, and terms and conditions of work for women improve • improved access to financial and non-financial business and small enterprise services for poor women • more equitable access to basic services, including water, sanitation, clean energy, and transport • changes in international regulations and policy frameworks to ensure more benefits to women from globalisation.

2.4.4 Other international policy statements:

2.25 Appendix A contains a selection of statements made by other development agencies about gender and economic reform programmes. These include: World Bank, OECD, Convention on the Elimination of all forms of Discrimination Against Women (CEDAW) and UN Economic Commission for Africa.

¹¹ For example, the Economic Wellbeing Target Strategy Paper is based around the MDGs

3 Development of DFID knowledge and policy on the enabling environment and links to policy on gender equality

3.1 DFID policy on enabling environments

3.1 The importance of a sound enabling environment that supports private sector development has been recognised in assessments and surveys conducted by the World Bank and OECD¹². DFID contributed to the 2005 World Development Report sixteen case studies that focused on the importance of a stable and supportive investment climate for achieving private sector development. These studies, and research conducted by the World Bank, OECD and others, have all concluded that the interlinking of a stable macro-economic climate with supportive policy and legal frameworks, open and transparent markets, strong public governance and reliable infrastructure are critical to encouraging domestic and foreign investment that leads to economic growth.

3.2 Research has also consistently concluded that high economic growth can contribute to poverty reduction provided it is associated with reducing inequality; in turn reduced income inequality is good for growth¹³. Economic growth on its own, therefore, is not enough to reduce poverty. It must be linked to policies that reduce inequality, in particular policies that equalise access to markets and economic resources. An objective of enabling environment programmes, therefore, should be to promote that equality of access and take up of opportunities.

3.3 In May 2004 the World Bank's Committee of Donor Agencies for Small Enterprise Development (of which DFID is a member) commissioned a paper on 'Donor approaches to improving the business environment for small enterprises.' This followed an earlier review (Nov 2002) commissioned by the same Committee on their experiences in supporting reforms in the business environment, 'Enabling small enterprise development through a better business environment.' DFID contributed to the case studies contained in these studies, and to the debate that followed publication of both papers. This led to the DFID Investment, Competition and Enabling Environment Team (ICEE) commissioning a review by S White and P Fortune which was finalised in Dec 2004, 'Review of DFID activities in the enabling environment.' The rest of this section draws on the findings contained in that review.

3.2 Defining business enabling environment reform programmes:

3.4 Reform of the business environment can take many different forms, from development of physical infrastructure to regulation of micro-finance operators; from relaxing constraints on foreign investment to reducing the bureaucracy involved in getting a street trading licence. Similarly the types of intervention that are applied can be wide ranging from technical assistance with revision of commercial legislation to developing capacity of civil society

¹² For example, the "Cost of Doing Business" Survey, produced annually by the World Bank

¹³ For example, a study of a sample 105 developing countries estimated that in relatively low income equality countries a 10% rise in GDP will be associated with a 9% fall in the numbers of the poor, whereas there will be only a 3% fall in high income inequality countries. (Income inequality is defined as the income or expenditure of the poorest 20% of the population as a % of total national income), Hanmer and Naschold (2000) quoted in DFID "Economic Well-being" Target Strategy Paper

agencies to enable them to represent their members' business interests more effectively. All of these reforms have a gender dimension that will both affect, and be affected by, the different way that women and men relate to economic change.

3.2.1 Defining the enabling environment arena

3.5 The enabling environment is a wide-ranging concept and can include almost anything pertaining to the political, economic and social environment in which business operates. Based on individual and focus group discussions with UK-based and in-country members of DFID's Growth and Investment Group, the ICEE Review of DFID enabling environment programmes agreed to focus on a definition that contains three core elements:¹⁴

- *legal and regulatory framework* for business generally and small enterprise in particular. This includes the rule of law and access of businesses to commercial justice
- *policy framework* for business and private sector development, including competition policy
- *institutional and organisational framework* for the design and implementation of, and compliance with, policies and programmes concerned with the regulation, promotion and representation of business.

3.6 In order to achieve consistency between this study and the ICEE Review, these three core elements have been accepted as the basis of an enabling environment in this gender thematic study.

3.2.2 Areas of focus of enabling environment programmes

3.7 Similarly the focus of 'enabling environment programmes' that are used in this study are the same those that were adopted in the ICEE review. These are set out in Table 2 with a brief description of what is included in each area of focus.

3.8 Although the list of focal areas in table 2 is a comprehensive range of enabling environment activities, several of them have significant gender dimensions that need to be considered. For example, do commercial law reform programmes include reform of land and inheritance laws which are a major constraint on women's rights and economic activity in most developing countries? Given that women dominate the informal sector, does 'Small and Medium Enterprise (SME) development' include informal and micro-enterprises, or only small and medium enterprises operating in the formal sector of the economy?

¹⁴ White, S & Fortune, P (2004), "Review of DFID Activities in the Enabling Environment"

Table 2 Areas of focus in DFID enabling environment work by frequency of funded activities/projects

Areas of focus	Africa	Asia	Europe	Latin America	Central Office	Total	% of total
General enabling environment	10	10	6	3	21	50	19.2
Regulation	8	8	3	3	7	9	10.7
Private sector advocacy and dialogue	5	4	1	3	1	14	5.4
Government analysis and response	5	6	0	0	1	12	4.6
Commercial justice	4	0	0	0	0	4	1.5
PSD policies and strategies	5	4	6	4	4	23	8.8
Trade facilitation	7	6	0	0	4	17	5.8
Investment flows	2	3	0	0	6	11	4.2
Privatisation and parastatal reform	7	10	0	0	1	18	6.9
Financial sector reform	16	12	1	2	11	42	16.1
Labour laws and standards	1	3	0	0	0	4	1.5
Tax reform	2	2	0	0	3	7	2.7
Competition policy	3	2	0	3	10	18	5.4
Infrastructure conditions	0	2	0	0	5	7	2.7
SME development	0	0	0	0	4	4	1.5
Corporate governance and corporate social responsibility	0	1	0	0	7	8	3.1

Areas of focus

General enabling environment: projects that support a broad review of the enabling environment and include investment climate assessments, the establishment of investment climate facilities, the informal economy, and enabling environment reforms related to specific sectors, such as agriculture and mineral extraction.

Regulation: deregulation projects or interventions that endeavour to simplify business registration procedures.

Private sector advocacy and dialogue: projects that support private sector involvement in enabling environment reforms and the promotion of a better dialogue between the public and private sectors.

Government analysis and response: projects that endeavour to help governments better understand the enabling environment and respond to the problems that have been identified. This includes governance projects that endeavour to improve governance of the enabling environment (i.e. public sector governance).

Commercial justice: projects that deal with commercial law and courts.

Private sector development (PSD) policies and strategies: projects that support the design and implementation of private sector development policies and strategies.

Trade facilitation: projects that improve the trade regime and the facilitation of trade opportunities.

Investment flows: projects that endeavour to create an environment that is conducive to increases in domestic and foreign private sector investment.

Privatisation and parastatal reform: projects that support the privatisation of State-owned enterprises and the restructuring of State institutions, including projects dealing with the privatisation of utilities.

Financial sector reform: projects that deal with informal and formal finance institutions, laws and regulations and improve the range of financial services (e.g., financial services for the poor).

Labour laws and standards: projects that deal with labour law and the promotion of labour standards.

Tax reform: projects that improve the tax regime (e.g., policies, laws, regulations, and institutions).

Competition policy: projects that support the establishment of competition policies and laws, as well as competition authorities.

Infrastructure conditions: projects that promote and facilitate private sector support for the provision and maintenance of infrastructure.

SME development: projects that focus on addressing the barriers to growth for small- and medium-sized enterprises.

Corporate governance and corporate social responsibility: governance within the private sector (i.e., of private firms), and includes issues such as social responsibility and business standards.

(Extracted from Review of DFID Activities in the Enabling Environment ' by White, S & Fortune, P, Dec 2004)

3.9 The number of programmes categorised under each heading is of interest from a gender perspective. The top four categories – those areas in which DFID has the most interventions¹⁵ – are general enabling environment (19.2%); financial sector reform (16.1%); regulation (10.7%); private sector policies and strategies (8.8%). At the other end of the spectrum, commercial justice, labour laws and standards and SME development are each only 1.5%. The latter, however, are three areas in which women have a significant interest. Some 70% of informal micro and small sector enterprises are managed by women; it is usually women working in the informal and micro-enterprise sector who experience lower wages and poorer working conditions; and it is in the area of commercial justice that women are most likely to experience discrimination in compliance with contracts, land ownership and tenure issues.

3.10 An important question raised by this table is whether DFID's focus is on small enterprise development (SED) or private sector development (PSD), or both, and if the latter, how the two are brought together. Although SED is a part of PSD, it is not always the case that what is good for large businesses is good for small businesses. This question is taken up in the review conducted by White and Chacaltana for the Committee of Donor Agencies in November 2002:

3.11 *'When defining the business environment, it was important to draw a distinction between business environments that enable PSD and those that enable SME development. Research has shown how SMEs are more vulnerable to biases and constraints in the business environment than larger enterprises. Thus within the thrust of PSD, SME*

¹⁵ It is understood that categorisation of the programmes took place at a meeting of the ICEE team and the authors of the report, against a list of current programmes compiled by ICEE. These programmes are listed and summarised in an Appendix to the Review report ("Review of DFID Activities in the Enabling Environment" by White, S & Fortune, P, Dec 2004)

development has a unique position... Reforming the business environment for SME development can be lost among efforts to reform the environment for PSD. SMEs have a specific set of concerns that need to be addressed in the business environment (eg anti-SME bias) and it is important to ensure that reform measures respond to the needs and priorities of smaller enterprises.'

3.12 DFID policies in the enabling environment relate to both SED and PSD that includes large businesses. Whilst PSD is seen as the major source of foreign investment and formal job creation, it is the micro and small enterprises that engage more than half of poor people living in some developing countries, in particular rural sub-Saharan African countries.¹⁶

3.13 The target strategy paper 'Halving Poverty' refers to the importance of SMEs: (para 3.10) 'SMEs are an important source of job and wealth creation in developing countries. Many of these enterprises operate in labour intensive industries such as textile manufacture or agro-processing which employ semi-skilled or unskilled labour from low-income areas... those that are established in rural areas help to diversify weak rural economies from dependence upon agriculture. 'As mentioned earlier there is an important gender dimension to this issue of firm size as women tend to operate mostly at the micro and small end of the business spectrum, and are less likely to be either proprietors or employees in medium to large sized firms. This question of whether DFID enabling environment programmes focus on SED or PSD or both should be considered in the main gender evaluation.

3.2.3 Types of activities and instruments used in enabling environment programmes

3.14 Another area important to defining enabling environment programmes is that they generally take place at macro level, that is through negotiation with, and provision of technical assistance to, governments in the context of their broad national and regional economic reform programmes. To a lesser extent they may take place at meso level, e.g. provision of technical support to organisations representing business interests and other agencies concerned to promote the voice of civil society. The *outcomes and impacts* of enabling environment programmes, however, are most keenly felt at micro level, that is by business owners and managers in the day to day operations of their enterprises, and the individuals, households and communities which are dependent on the business activities of those owners and managers.

3.15 The ICEE Review identifies the instruments and activities most often used in DFID enabling environment programmes. These are listed in Table 3 on the next page. Table 3 shows that the most frequent type of intervention is capacity building (29.3%), followed by policy research and technical assistance (both 14.9%), and then policy development (12%). At the other end of the scale advocacy comes last with only 1.6%. This is an area, however, where socially excluded groups, eg women and ethnic minorities, might have been able to benefit from more support in making their case to government either through development of their own representative organisations or through channels used by larger players in the private sector realm who tend to have easier access to government and be better organised and resourced in business membership organisations.

¹⁶ Estimates vary from 50% - 70%, of which the majority (approx two-thirds) are managed by women

Table 3 Activities and instruments used in DFID’s enabling environment work by frequency of occurrence in funded projects

Activities and instruments used	Africa	Asia	Europe	Latin America	Central Office	Total	% of total
Capacity building	24	25	9	8	7	73	29.3
Policy development and analysis	5	10	4	3	9	1	12
Policy research	5	1	0	0	31	37	14.9
Technical assistance	11	12	4	0	10	37	14.9
Budget and financial support	5	6	0	3	5	19	7.6
Advocacy	0	0	0	0	4	4	1.6
Monitoring and evaluation	1	1	0	0	8	10	4.0
Facilitating dialogue	3	4	0	4	8	19	6.8
Raising awareness and exchanging information	0	0	0	0	22	22	8.8

Activities and instruments used

Capacity building: activities that improve the ability of key organizations (e.g., government ministries, regulatory authorities) to carry out reforms or to manage the enabling environment more effectively. This includes training programmes and management development programmes.

Policy development and analysis: activities that lead to the design and analysis of new policies.

Policy Research: activities that focus on better understanding the problems or constraints of the enabling environment.

Technical assistance: the provision of technical information and advice (e.g. drafting policies and laws, advising on strategies and implementation arrangements).

Budget and financial support: budget support refers to the provision of funds for countries that adopt a poverty reduction strategy that include enabling environment reforms, which are integrated into government budgetary processes, while financial support refers to funds provided to government for more specific programmes.

Facilitating dialogue: activities that bring the public and private sectors together, or assist in negotiations between national governments and international agencies.

Advocacy: activities that help certain actors (e.g. the private sector) create a demand for reform of the enabling environment.

Monitoring and evaluation: activities that help reform partners monitor and evaluation the impact of their efforts on the enabling environment.

Raising awareness and exchanging information: activities that make government, the private sector, and other stakeholders more aware of the importance of the enabling environment, as well as activities that facilitate the sharing of information on how to improve the enabling environment.

(Extracted from ‘Review of DFID Activities in the Enabling Environment ‘ by White and Fortune, December 2004)

3.3 Linking enabling environments to other DFID policy areas

3.16 Enabling environment policies are also linked to other key areas of DFID work, some of which are covered by other studies in this series.

Governance and public institutional development

3.17 Implementation of growth-focused economic reform depends upon stable government and capable, transparent institutions at all levels: from elected policy makers through to administrative staff responsible for front-line delivery of services. In the Target Strategy Paper 'Making government work for poor people' DFID prioritises working with governments 'developing regulatory systems to assure the quality of private sector providers of services and to encourage competition.'

From the DFID target strategy paper 'Making government work for poor people' (2001)

'The state plays a crucial role in stimulating economic growth through its management of the economy. An effective state does this by creating a stable macro-economic environment, by creating the conditions whereby markets operate effectively and by representing the public interest. This includes tackling the inequalities and constraints that hinder poor people from accessing markets and services and safeguarding the environmental sustainability of economic growth.' (p15)

'Market friendly governments will seek a broad dialogue with the private sector including small-scale enterprises. Governments may have to create new institutions to fulfil their new enabling role.' (p17)

'Regulation should also involve wider accountability mechanisms through reports to parliament and the inclusion of consumer bodies.' (p18)

Support for civil society representation

3.18 The TSPs also state that the MDGs can only be achieved 'through the engagement of poor people in the development processes which affect their lives' and 'empowering people to take their own decisions.' Because women in many countries are prevented from participating in government decision-making processes, their economic and business interests are often ignored. Building a strong civil society supported by democratic institutions is central to reducing inequality and thereby increasing pro-poor growth. DFID enabling environment programmes include support for private sector membership-based organisations, but these may be dominated by large, corporations, usually headed by men, who do not recognise the special constraints of small and micro enterprises, and the additional constraints under which women entrepreneurs often have to operate, eg the limitations on their access to finance, rights to hold property title etc. Besides needing to support mechanisms that encourage greater participation by small enterprises in business associations, there will also be occasions when special arrangements are required to ensure women's voice is heard within the business community.

Macro-economic reform and fiscal policy

3.19 Enabling environment programmes that review legal and regulatory policy frameworks are a central feature of agreements between governments and donors on macro-economic reform and often a key component of General Budget Support funding. Macro-economic

strategies also entail fiscal policy management, and several DFID enabling environment programmes are concerned with tax reform. The past decade has seen growing recognition of the importance of fiscal policy in shaping women's living standards and opportunities for economic empowerment, in particular through developing Gender Responsive Budgets. By means of gender analysis at each stage of the budget process these have been able to assess the different impacts on women and men of government tax and expenditure policies and priorities. These offer an opportunity – an entry point – for DFID to influence economic reform and ensure it is pro-poor and gender equalising.

Agricultural sector:

3.20 Many of the rural poor in developing countries depend on subsistence agriculture and production of locally consumed cash crops. Their productivity is low due to lack of technology, poor quality land and inputs, and their access to markets is limited by lack of transport infrastructure and inability to compete due to low grade products. The importance of agriculture to long-term economic growth in developing countries which have a large rural, smallholder farmer population is now recognised and treated as 'a private sector activity.' As a result, DFID, like other donors, has moved away from focusing on localised projects that promote agricultural extension work to looking at how agriculture can be a *driver* of growth, and open up opportunities for more non-agricultural employment.

3.21 Changes in production patterns can have significant gender impacts. In some areas women are principally involved in traditional food production, while new jobs for commercial farm workers go mainly to men. Other sectors such as floriculture may employ large numbers of women, but in conditions that are less healthy and provide a poorer standard of living than traditional agriculture. Evidence from several African countries suggests that female farmers are as efficient as male farmers but are less productive because they have less access to the necessary inputs and human capital, and they have less time due to household and family commitments. Their time poverty is deepened by lack of basic infrastructure such as water and sanitation. It has been calculated that if women's access to agricultural inputs was equal to men's, total agricultural output in sub-Saharan Africa could increase by 6–20%.¹⁷

Trade

3.22 Linked to opportunities for developing more value-added agricultural products and processes is the opening up of new markets for those products. There are strong gender dimensions to the development of international trade as confirmed by a recent Sustainability Impact Assessment of the Proposed World Trade Organisation (WTO) Negotiations (2003). This points out that the textile and clothing sector predominantly employs low-skill, low-income workers, with a high proportion of female labour, and any changes in trade conditions is likely to have significant social impacts. These are most likely to be adverse in low-income developing countries with weak minimum wage and job security regulations, poor working conditions, weak health and safety regulation, discrimination against female workers, and child labour concerns.¹⁸

¹⁷ World Bank (2002) "Gender Equality and the MDGs"

¹⁸ Private communication from C George, IDPM, Manchester University, summarising extracts from SIA of WTO Negotiations.

3.23 A recent report evaluating DFID support to Trade Related Capacity Building (TRCB)¹⁹ refers to the increasingly important role of the ‘enabling approach’ in attracting private investment. This reflects changes which have been taking place in the trade development arena over the past decade, with a move away from focusing activity on export marketing to facilitation of trade through reduced regulation and transaction costs, and improved knowledge and information about prices and markets. The report on DFID TRCB activities criticised the absence of gendered dimensions in their design and implementation, and suggested that further research on gender and trade at national level could play a stronger role in helping policy makers understand the gender-differentiated impact of trade reforms.

3.24 Another dimension of trade and source of foreign exchange is remittances from migrant workers. These are now estimated to exceed aid flows, and up to half of all migrant workers are women.²⁰ Remittances from both domestic–urban and foreign migration can have a significant impact on the livelihoods of poor rural households and economic development of communities. In this way the right policy and financial mechanisms can contribute to pro-poor economic growth at both micro and macro level. Changes in the legal and policy frameworks can also influence social attitudes to women’s migration, impacting on their migration choices and education opportunities, and their families’ livelihood strategies. It can also affect how women use their remittances when they return home, eg whether they are able to control their own finances and use them to set up businesses or buy land in their own name. In recent years DFID has been active in development of international policy dialogue on migration and remittances, and in particular has drawn attention to the importance of the gender dimensions of the international policy environment for migration.

Corporate social responsibility

3.25 Besides making business sense Corporate Social Responsibility is now recognised as an important part of pro-poor growth enabling the setting of internationally acceptable standards in both the environment and labour markets. The latter have been highly genderised in many developing countries, with women in particular experiencing low wages and poor working conditions as multinationals seek out low wage countries and regions.

3.4 Linking DFID policy on enabling environments to gender

3.26 Although the link between pro-poor growth and gender inequality has been proved time and again, evidence of DFID policies directly and explicitly targeting gender inequality as part of the business enabling environment is hard to come by. A couple of exceptions are given in the box below, but there remains a tendency only to deal with gender in any depth in the Gender Target Strategy Paper (‘Empowering Women’). In general it is treated separately from mainstream macro-economic discourse, or it is dealt within poverty analysis, similar to how it is treated as a poverty and welfare issue separately from the macro-economic discourse in PRSPs.

¹⁹ Blouin, C, de Silva, L, and Weston, A (Nov 2004), “Evaluation of DFID Support to Trade Related Capacity Building” Report by North-South Institute for DFID

²⁰ in some cases, eg the Philippines, they comprise up to 70%

From 'Breaking the barriers' (DFID, November 1998)

'We encourage our partners in developing countries to make sure that economic management and investment programmes take account of gender issues and urge the private sector to be more socially responsible.'

From the target strategy paper 'Empowering women' (DFID, September 2000)

'Interventions that improve poor people's access to assets can reduce vulnerability... The goal of gender equality is achievable... progress has been greatest where there has been strong political will, where changes in laws and regulations have been followed through with real action... Lasting change is best brought about through interventions which focus on major policy reforms, changes to laws and regulations, the reallocation of financial and other resources.'

3.27 DFID policy on women's economic participation has changed in some fundamental respects over the past ten years. In the 1990's there was an emphasis on projects that targeted women, in particular in the fields of micro-finance and business development services, in keeping with a Women in Development (WID) approach. As DFID has shifted its focus away from project funding towards General Budget Support (GBS) and sector wide approaches (SWAPS), there has been a corresponding move away from managing these types of targeted projects towards seeking to influence partners to mainstream gender across their broader programmes, for example within Poverty Reduction Strategies and budget reform processes such as Medium Term Expenditure Frameworks. Although public policy statements continue to highlight the need for gender awareness and analysis in these broader programmes and processes, it is less easy to identify how these policy objectives are actually applied, or operationalised, in DFID work 'on the ground' and in Country Offices.²¹

3.28 In their review of donor intervention mechanisms and processes in enabling environments (2002), White and Chacaltana make a disturbing point:²²

3.29 'Interestingly, across all regional and country reports, the issue of gender was absent. Despite the likely need for reforms that redress biases against women that may be found in many societies and, hence in many business environments, no evidence of donor agency support for such reform measures was documented. Regulatory weaknesses that act against SME's are likely to act against all less empowered interests in society – including women. Correcting government and regulatory failures can do much to empower those with less access to authority or to full economic participation. However, it was surprising to note that none of the countries under study found evidence of a gender perspective among donor agencies in their efforts to address the business environment in which SMEs operate.'

²¹ Moser, in her Gender Audit of Malawi (Oct 2004), links this change to a move away from a human rights perspective towards a macro-economic focus. The SDAs in Uganda have recently circulated a short note to SDA's outlining the way gender was mainstreamed into the PEAP, and they make the point that the change in aid modalities towards budget support "poses new challenges for gender mainstreaming. Gender mainstreaming was largely conceptualised in the context of project aid. Tools and training for gender mainstreaming focused to a great extent on ensuring that projects adequately reflected and addressed gender concerns." (Note by Arthur van Diesen and Jenny Yates January 2005)

²² Chacaltana and White (Nov 2002), "Enabling small enterprise development through a better business environment", (p26), Committee of Donor Agencies for SED, World Bank.

3.30 This is not to say that work on gender issues is not being undertaken by DFID and the other donors who were reviewed in that report. It may simply be that their work is not being documented in reporting systems. It does suggest, however, that it is harder to identify and isolate the outcomes and impact of that work on gender inequality in the context of SWAPS and GBS, and that it is being subsumed in the assumptions of either the gender-blind or welfare approaches of the economic growth and poverty alleviation paradigms discussed earlier. Or it may be the case that work on gender equality and women's empowerment actually has declined as a result of the new aid modalities. This needs to be investigated further in the full evaluation.

3.5 Some problems in assessing impacts of enabling environment programmes

3.31 The above discussion emphasises the findings of the ICEE review that, to date, very little work has been done to assess the impacts of enabling environment programmes in general, quite apart from any specific analysis of gender impacts. Indeed this lack of work on impact assessment of enabling environment programmes is an issue which is being pursued by the ICEE team for DFID, and by other donors who will be coming together for a conference in November 2005 to review initiatives currently being taken in this field.

3.32 Part of the reason for this lack of attention to evaluation and assessment of impacts is due to the complexity of the context in which enabling environment programmes operate. Efforts to date have tended to focus on *processes* rather than outcomes, ie organisational change and how regulatory reform has been managed from pre-reform assessment stage of diagnosing the constraints on business through to setting up the administrative structures for implementing the reforms. *Outcomes and impacts* of the reforms at firm and sector level have not been comprehensively assessed by any donors, largely for reasons discussed below.

3.5.1 Programmatic challenges

3.33 The various research studies conducted by White et al identified several core problems in assessing impacts of enabling environment programmes in general:

3.34 *How to isolate business reform measures within broader programmes of development co-operation* (eg in SWAPS and GBS): by their nature SWAPS and GBS agreements include a wide range of related components, objectives, areas of focus and types of interventions. It is not possible to isolate and monitor one reform measure in a complex web of changed policy and legislative frameworks.

3.35 *How to deal with attribution and the counterfactual.* in any circumstances it is difficult to attribute impact to any one development activity. In the context of enabling environment programmes that are subject to many external influences (eg global and regional political and economic factors) and internal stresses (eg private political and personal agendas) it is almost impossible to give any reliable measurement as to the influence or impact of a specific reform measure, or to gauge what would have been the outcome if that reform measure had not been implemented.

3.36 *Limited time frames of enabling environment programmes.* Impacts of most reform measures are only apparent over time, and yet most assessments are conducted at best

within six months of the end of a programme, which may in itself only be of a few years duration that is often insufficient time to embed changed attitudes and roles within institutions. It is therefore only possible for a framework to attempt to predict outcomes and impact based on earlier learning and appropriate pre-reform assessment techniques (for example, by conducting a Regulatory Impact Assessment).

3.5.2 Challenges to assessing gender in enabling environment programmes

3.37 These problems of assessing impact of enabling environment programmes are compounded by the problems of assessing impacts on gender inequality and women's empowerment. Watkins in his report on 'DFID Experience of Gender Mainstreaming 1995–2004', refers to evaluations of gender mainstreaming conducted by the Swedish International Development Co-operation Agency (SIDA) and European Commission (EC), both of which found that documentary evidence and project monitoring data was neither reliable nor sufficient to demonstrate impact, and that it 'had to be supplemented by direct work with project participants and primary stakeholders.' Similarly a Development Assistance Committee (DAC) Review on gender mainstreaming concluded that the focus has tended to be on institutional mainstreaming practices rather than on results or outcomes.

3.38 In terms of assessing gender impacts in the context of enabling environments, challenges include:

3.39 Macro-level data is rarely disaggregated by gender, except in very general terms (eg numbers of women and men in full-time permanent employment, but nothing about the different conditions of that employment)

3.40 Nor does data collected for economic reform programmes usually differentiate between social and financial status of men and women, or between different groups of men and women, or their variable capacity to participate in the economy and pursue market opportunities.

3.41 Nor is programme data between various gender differentiated factors usually linked, eg access to economic resources and health, or voice of women through civil society representation and their capacity to influence economic reform through business advocacy organisations.

3.42 Interventions that reform laws and policies which discriminate against women at national level may not be enacted at local level due to the precedence given amongst communities to local cultural tradition. For example, land and inheritance laws may be reformed and governments may sign up to the various international agreements, but in some rural communities (for example, in Zambia²³) 'widow-chasing' and 'property grabbing' continues, and there is no quick, local judicial source to support women's legitimate claims. These differences between 'legal' and 'custom', or theory and reality, are hard to identify or track in assessments of policy and legal reform unless special attention is given to gender issues.

²³ Pinder, C, (Mar 2002) "Gender Empowerment & Change Processes in CARE Zambia's Programming Work", report for CARE Zambia. (Refers to how widows and their children may be thrown off their land and out of their homes by their late spouse's family; they may also lose the children and all their household goods.)

3.5.3 Data limitations and Institutional factors:

3.43 In addition to the conceptual problems listed above, this study has found that there are serious data limitations and institutional issues that arise from reliance on desk-based research. The full evaluation, therefore, will need to include a number of country studies in addition to literature and statistical reviews. The following is a list of some of the data constraints that have been found with this study:

3.44 The principal *source of programme documentation* for the case studies was PRISM which does not contain information about all programmes, or all the documents for the programmes which it does list.

3.45 *Loss of institutional memory.* This occurs largely because of staff turnover either through natural change or due to DFID policy to limit most country postings to 3–5 years. Supplementary case study documentation was sought from Country Offices, but here one ran into problems of institutional memory. It was intended to look at a random selection of programmes which had been running since before 2002, for which it was assumed Output to Purpose Reviews (OPRs) and/or Project Completion Reports (PCRs)²⁴ had been completed. However, in five out of six of the Country Offices contacted, the person responsible for the programme no longer worked there. The effect of this loss of institutional memory is not just a difficulty in tracing documents. More importantly it affects the way programmes are managed in later stages, and whether or not extensions are granted (eg new staff may have different interests and programme priorities), and how objectives may change (and how these may be recorded as markers on Project Header Sheets).

3.46 Furthermore, there have been several changes to the *format of the Project Header Sheets* and other PRISM documents, so there are inconsistencies in the way information is presented or can be reviewed for comparative purposes (eg regarding funding modality), and many OPR and PCR forms were only half completed.

3.47 The way in which the *gender policy markers* have been used (or not used) is also problematic. There was a tendency to use a P (principal) or S (significant) marker only if the programme was specifically targeted at women, and this may hide the impact that a programme without a marker could potentially have on gender relations. This problem of markers was compounded by a change in the objective description in 1997/8, from 'Women in Development' to 'Gender Equality', making it hard to compare programme commitments across several years.

3.5.4 Institutional Challenges

3.48 The statistics on expenditure suggest that less money is being spent on gender focused programmes now than in 1997. It is possible, however, that this is a reflection of *changes in funding mechanism*, ie more is now being channelled via General Budget Support than direct programme or project funding. Nor is analysis by expenditure an accurate or fair reflection of what may be actually happening in country offices in terms of the greater, or lesser, time that staff are spending on 'influencing' the way GBS is used on gender and other cross-cutting issues.

²⁴ Output to Purpose Reviews and Project Completion Reports

3.49 *Fragmentation of knowledge and policy focus between disciplines:* it was suggested at several meetings with key informants that despite changes in the structure of DFID, there is still a tendency (perhaps an understandable tendency based on training and professional development interests) for advisors to view programmes predominantly from the perspective of their own discipline, eg governance, social development, environment. In other words large programmes, such as SWAPS with their many cross-cutting components, fail to get 'joined up'.

3.50 *Individual influences:* it is also evident that the promotion of gender issues (and other cross-cutting issues) tends to depend on the degree to which the individual advisor is knowledgeable and comfortable with the topic. As was found by Moser when conducting the Gender Audit in Malawi, advisors may be keen to engage more with gender issues, but they lack the knowledge and skills to do so. This can lead to compartmentalisation of gender issues, with just one or two members of the country team being the assumed 'gender experts', and when they leave there may be a gap in the organisation's capacity to take it forward.

4 Review of how gender has been treated in a sample of DFID enabling environment programmes

4.1 DFID's target strategy paper (TSP) 'Empowering Women' defines a twin-track approach to gender mainstreaming that combines specific activities aimed at empowering women with a commitment to put concerns about gender equality at the centre of development programmes: 'While equality of rights and opportunities for both women and men is the goal, a specific focus on women is justified on equity grounds as long as they continue to bear the burden of gender discrimination.'

4.2 The paper sets out ten development objectives, one of which is to 'secure greater livelihood security, access to productive assets and economic opportunities for women as well as men.' Indicators and activities against this objective include improved access to financial services, infrastructure and transport, information flows; reforms to land and inheritance laws, adherence to core labour standards.

4.3 The TSP links the importance of gender equality to enabling environments as a means of ensuring pro-poor economic growth: 'As gender gaps close, economic benefits should flow which will make more resources available, thus creating a virtuous cycle which will further accelerate the pace of change. Measures for assessing the achievement of greater livelihood security for women will include: changes in land and other laws relating to women's property and tenure rights, and changes in international regulations and policy frameworks to ensure more benefits to women from globalisation.'

4.1 Analysis of programme expenditure statistics

4.4 Expenditure figures for eleven years, 1993/4 to 2003/4, were extracted by DFID's Statistics Department against the following input codes which covered the main areas of focus identified by the ICEE review:²⁵

70001 Economic policy	70010 Public-private partnerships/privatisation (PPP/P)
70003 Trade and investment	70015 Economic research
70006 Private sector development	78001 Agriculture policy
70007 Financial development	78002 Land policy
70009 Rural skills development	78004 Rural service: delivery and financial

4.4 A detailed statistical breakdown is available from DFID Statistics Dept, but the key points to note are:

4.5 Those marked with P against the Gender objective²⁶ only constitute 1% of expenditure totalled for all these sectors and 39 (1.6%) out of 2407 programmes in these sectors over the whole period; those with S against the Gender objective constitute 7% and 182 (7.6%) respectively.

²⁵ These figures need to be further interrogated and triangulated during the main evaluation.

²⁶ Unless specified, in this analysis of the statistics reference the "Gender" marker includes both the Women in Development marker that was used from 1993/4, and the Gender Equality marker that was introduced in 1997/8.

4.6 For expenditure highest sector with a P marker against Gender was Economic Policy (4%) followed by Land policy (2.7%) and Private Sector Development (2.6%). Highest sector with an S marker against Gender was Land policy (30.3%) followed by Rural skills (16.3%) and Economic policy (13.5%)

4.7 For expenditure lowest sectors with a P marker against Gender were Trade and Investment, Rural skills, Public–Private Partnerships/Partnership (PPP/P), and Rural Services and Delivery. All of which had nil expenditure. Lowest sector with an S marker against Gender was PPP/P (nil), followed by Economic Research (2.2%) and Rural Services and Delivery (2.7%).

4.8 Expenditure on Women In Development (WID) programmes (which was the old description that was phased out from 1997/8 onwards and replaced by the definition of ‘Gender Equality’ (GE)) that had a P marker declined from a peak of £6,028,651 in 1996/7 to £53,098 in 2003/4. Some of the WID programmes were re-categorised under GE, but even so the peak reached under WID was not matched by a corresponding increase in programmes that came on stream with the new description of GE from 1996/7 onwards, under which programmes with a P marker only totalled £99,411 in 1997/8, peaking in 2003/4 at £1,293,687.

4.9 Similarly, WID expenditure on programmes with an S marker peaked in 1997/8 with £18,703,755, and declined steadily to £1,194,292 in 2003/4. Again this was not compensated by a rise in expenditure under GE programmes with an S marker, which in 1997/8 totalled £3,184,024, then went up and down over the years from between £3m to a £6.7m peak, and settled at £4,863,182 in 2003/4.

4.10 By adding expenditure under WID and GE for each year it is evident that total expenditure on programmes with either description (WID or GE) and either marker (P or S), with a focus on economic reform/private sector development/regulatory and enabling environments, declined significantly. This decline is even more worrying when placed in the context of the increased expenditure that has been allocated to international aid and development work over the whole period: in 1993/4 all of DFID (then ODA) spending was £2.15 billion, and in 2003/4 it was £2.78 billion.

4.11 Numbers of programmes with an economic focus and a gender marker have also declined from 9 WID & GE programmes with a P marker in 1997/8 (the peak year), and 102 with an S marker in 1997/8 (peak year for both P&S markers and expenditure), down to 4 WID & GE programmes with a P marker in 1997/8, and 21 with an S marker in 2003/4. The following table shows the differences in the number of programmes with a gender marker over the years:

Table 4 Analysis of gender programme markers 1993/4–2003/4

Five-yearly intervals	WID programmes with 'P' gender marker	GE programmes with 'P' gender marker	All programmes with 'P' gender marker	WID programmes with 'S' gender marker	GE programmes with 'S' gender marker	All programmes with 'S' gender marker
1993/4	2	0	2	56	0	56
1998/9	6	2	8	62	21	83
2003/4	3	1	4	11	10	21

4.2 Review of sample programmes

4.12 Five country-based programmes and two non-country specific programmes were selected from amongst those listed in the statistics under the codes listed at 4.1.²⁷ The documentation held for them on PRISM was examined along with relevant Country Assistance Papers. Country Offices were contacted for additional material, and in some cases staff were phoned for further information. Documents examined are contained in Appendix C and summaries of the analysis in Appendix D.²⁸

4.13 It is important to note that this sample programme analysis was based only on the documentation that was supplied. This is not to say that other, undocumented, work is not being undertaken in country, 'on the ground', or that there isn't other documentation which might have given a fuller picture. One of the objectives of this study was to see how practical it is to use desk based, remote methods of data collection, and whether the documentation is sufficient to enable an adequate evaluation. As discussed earlier, there were found to be serious limitations in relying only on documents available on PRISM, and it is clear in-country investigation is needed to get a fuller picture.

4.14 Bearing in mind the scantiness of the documentation that was available for some of the programmes, the information sought for and analysed from the documents was:

- basic data: gender marker, type of funding, dates of start/completion/extension, whether gender marker had changed over the programme's history
- objective of the programme, summary of its implementation history, any reference to gender impacts targeted and/or achieved
- review of how gender has been treated from initialisation to completion or review (whichever was applicable)
- other issues, eg whether any gender issues were missed, potential opportunities for further development.

4.15 Key points arising from the analysis are set out over the next few pages.

²⁷ Selection was randomly made by the author in conjunction with a staff member in Evaluation Dept who had access to all PRISM data, within a rough criteria of: started before 2002 (so that an OPR had probably been done, and in some cases a PCR and/or final impact assessment), broad geographical coverage, and broad coverage of the main areas of focus listed in the ICEE review (see Tables 2 & 3) – some programmes covered several focus areas.

²⁸ Available from DFID Evaluation Department, East Kilbride, UK

Box 1 Bangladesh Trade Capacity Building Programme

Conclusion: no reference is made to gender in any of the documentation supplied and it would appear the BTCB programme was a missed opportunity in terms of gender. With the new Country Assistance Plan (CAP) in place it could be expected that subsequent trade capacity projects will place greater emphasis on gender issues, however, and in particular employment impacts on women of the business and trade regulatory environments.

It does not have a gender marker and no reference is made to gender in any of the documentation supplied.

Programme goal: To expand the supply base of exportable goods and services in Bangladesh.

Programme purpose: To increase the efficiency and effectiveness of Government of Bangladesh's trade policy within the new global trading system.

Programme outputs and activities: The programme included a series of studies on trade issues (eg competition policy, and sector/subsector protection rates) and sectoral analyses (eg leather and leather goods). It also included training events (eg on WTO Safeguards, Anti-dumping and Countervailing Duties) and study tours (eg to Geneva for briefings and trainings in WTO). Programme operationalised through Bangladesh Tariff Commission.

Comments: Trade regulations can have significant gender implications. The expiry of the Multi-Fibre Arrangement in 2005 will have a serious impact on the jobs of workers in the formal sector of the garment and textile industries. No mention is made in the 2001 OPR to the MFA cessation and its effects, though it would have seemed logical for this to take a prime place for attention given the number of workers involved.

The CAP refers to (in reference to the MFA and trade issues): poor production standards in export industries could result in huge female job losses if B is unable to respond and buyers turn to other suppliers. The CAP, produced in Nov 2003, after BTCBP had finished, makes 'Women and girls first' it's central theme and notes that (para 6.7) the 'Interim Poverty Reduction Strategy objectives are unlikely to be achieved without a genuine and across the board commitment to gender equality.

Box 2 Guyana Enterprise Reform Programme – Privatisation

Conclusion: Although gender issues were not referred to in any of the documentation covering the early phases of the programme, and there were no gender markers against the programme, a PSIA looking at the impact of the sale of one of the mines was carried out in May 2004, called 'Disentangling Gender' which drew out the differential impacts the mine closure would have on men and women living in the area.

It does not have a gender marker and no reference is made to gender in any of the official documentation supplied through PRISM but a recent PSIA was conducted which did draw attention to gender impacts of privatisation of a large mine formerly owned by the government.

Programme goal: To enable Guyana to pursue sound economic policies, with increased private sector participation, underpinning Guyana's development and poverty eradication objectives.

Programme purpose: Strengthened Privatisation Unit (PU) able to fulfil its responsibilities in managing public assets and the GOG privatisation programme together with an operational Guyanese securities market.

The CAP: recognises there is a need to address gender issues but doesn't explicitly make the link between the importance of gender issues and economic growth. It makes reference to the social exclusion of young men in urban settings due to limited skills and opportunities; also that the 'links between poverty and gender in the Caribbean are not as clear cut as in some other regions'. It has a large percentage of female-headed households but these families are not always poorer than male-headed households. ' Both the PSIA and the CAP highlighted the plight of men and boys resulting from the lack of alternative employment in the region, and the potential impact this can have on household relations (eg increased domestic violence) and on women's livelihood coping strategies (eg early marriage of daughters and possibly recourse to prostitution).

Box 3 Kenya Deregulation Project

Conclusion: Although the documentation supplied for this project makes few references to gender equality and women's empowerment, key areas tackled by the programme (eg trade licensing laws) have significance for women as informal traders and proprietors of micro and small businesses.

Although this programme does not have a gender marker, it does contain purpose level OVIs and make women's economic empowerment a central feature.

Programme goal: 'Increased self employment and paid employment opportunities for poor people' (logframe Sept 1997); for the (later) Umbrella Project it was revised: 'to generate sustainable increases in income and employment through growth and development of the private sector in Kenya.'

Programme purpose (Sept 1997): To improve the legal and regulatory environment for MSEs and business generally; later this is revised to ... particularly those owned by women.

Programme outputs inc increased capacity within GoKs Deregulation Section; reviews of legal and regulatory constraints; policy recommendations and follow-up action. Areas for review: labour laws, standards, training, tourism, construction, gender issues, infrastructure & planning, trade licensing.

Project memo: (original, Sept 97) notes that a special effort 'will be made to look at regulations and laws that discriminate against women in business.' This is reflected in the logframe as an OVI for Purpose: 'Regulatory environment provides equal opportunities for women and men in business.'

Comments: KDP was one of the programmes surveyed for the WDR 2005¹, and the report for that identifies three cost areas for entrepreneurs: land and property title, access to finance, and trading licences. All three are critically important for women entrepreneurs, particularly poor women in the informal sector. Although not mentioned in the report, it is known that licensing procedure is particularly important for women traders who often experience intimidation from market officials. Introduction of the Single Business Permit (effected under KDP) is estimated to save businesses £3.8m per annum. Report states that 'Kenya's smallest firms will be the largest beneficiaries from this reform.'

The CAP: The CAP makes specific reference to women's lack of ownership and control over productive assets, and that a key issue will be 'restoring growth to the agricultural sector... including measures to increase the economic participation of women.'

Box 4 Mozambique Support to Agriculture Sector Public Expenditure Programme (PROAGRI)

Conclusion: Gender equality and mainstreaming were central to this SWAP from the start, and this included attention to social and cultural issues impacting on gender. However, it appears most programme activity remained at farm level (dealing with 'women's practical needs') where the concern was to improve their access to extension services; also that there is need for more guidance about how to practically operationalise gender issues in SWAPS. From phone discussions with staff involved at the time, it is likely that more was happening 'on the ground' than the documents convey.

No gender markers (except on one version of project header sheet for Sept 1999, when an S appeared), but gender equality is an issue raised in Project Memo, OPRs and PCRs.

Programme goal: (Sept 1999) Transformation of subsistence agriculture into one more integrated in the functions of production, distribution and processing.

Programme purpose (Sept 1999): To promote White Paper principles, especially a participatory, gender-equitable and pro-poor focus within PROAGRI through (outputs): institutional reform and modernization; development of civil service capacity; sustainable management of natural resources.

Project memo: (original, Sept 99) refers to activities for gender mainstreaming, and specific actions (eg re land tenure) to reduce discrimination against women. Clear links made between gender inequality, discrimination against women, poverty in Mozambique, and need to tackle these to achieve economic growth with agriculture as the driver, since most of the population are engaged in subsistence farming.

Project completion report (Sept 2003, before extension given) reports there has been too much concentration on direct interventions at farm level rather than the enabling environment.

The Country Strategy Paper (CSP) refers to PROAGRI in one of its 3 Specific Objectives, 'Promoting sustainable rural livelihoods.' Several references made to gender inequality, particularly in context of discrimination against women regarding inheritance and land tenure issues, and education and health sectors. Rural poor women, and female heads of households also referred to in relation to livelihood programmes.

Box 5 Ukraine Trade Policy Capacity Building Programme

Conclusion: Gender inequality may not have been an issue before Ukraine's independence but more recent countrywide analyses of poverty and human rights are drawing out gender differences, and these are becoming more apparent in the different ways women and men are responding to transition.

Gender equality or mainstreaming is not referred to in any of the documents.

Programme goal: Ukraine liberalises trade and becomes more integrated with the wider European economy in order to foster economic growth.

Programme purpose: to increase the capacity of GoU to formulate and implement trade policy that reflects a broad input from stakeholders and is underpinned by analytical and technical analysis.

Programme outputs: include trade policy analysis in several areas, various training events, and establishment of a national trade policy training centre.

Comments: Gender mainstreaming has been seen as less of an imperative in FSU countries as equality of opportunity and access to resources were taken for granted, although in practice there was often stereotyping of male and female roles as regards reproductive responsibilities, with women frequently having the double burden of full-time employment and management of the household.

This gender stereotyping has begun to emerge more clearly since the break up of the FSU, with men feeling the loss of employment status most acutely as evidenced by rising suicide rates and vascular failure amongst men, and a recent report by Human Rights Watch (Aug 2003) on discrimination against women in job recruitment procedures. Although documentation for this programme made no reference to gender, in the project memo of a later DFID programme (Economic Regeneration and Social Mitigation in Donbass in SE Ukraine), there is reference to gender differences in the job market.

The Ukraine CSP does not make reference to gender equality or women's empowerment.

Box 6 Business Linkages Challenge Fund (and pilot undertaken in Ghana)

Conclusion: This programme would seem to support the notion that there are differences in the way gender is approached at country level where there is opportunity for factoring in local conditions such as gender constraints, and the overall design of the Challenge Funds which is primarily aimed at contributing to economic growth by accelerating private sector development and exploring new market opportunities.

No gender markers, and neither gender equality, mainstreaming, nor women's empowerment are referred to in any of the documents.

Purpose for BLCF: To improve business competitiveness and ability to access markets of enterprises, enabling benefits of globalisation to be secured for and by the poor.

Purpose for Ghana BLCF: To assist Ghanaian businesses to improve their competitiveness and ability to access new markets through the establishment of business linkages, enabling the benefits of globalisation to be secured for and by the poor.

Outputs include: (for BLCF – not quoted, but remit is to set up country-based projects such as Ghana BLCF) in addition to dispersal of small grants to innovative business linkage programmes.

Outputs for Ghana BLCF: to set up at least eight innovative projects that deliver improvements in SME competitiveness; strengthen the role of domestic producers in meeting domestic demand; improve the enabling environment.

Comments: Documents on BLCF website and phone call to Programme Manager, revealed gender equality and empowerment issues managed within third criteria 'impact on poor'²⁹ when applications are assessed. Believes the programme should have a 'light touch' on monitoring as it is essentially a private sector demand driven programme, so to do extensive monitoring would be inappropriate. Mid term review currently in hand and this will be including social impacts and gender.

The Ghana CAP: A priority theme in the Ghana CAP is supporting the government to develop an 'enabling environment for private sector led growth that enhances poor people's ability to effectively participate in markets.' This is linked to support for the GPRS and to social priorities which include gender equality, rights and social protection of the vulnerable and excluded.

²⁹ First criterion is commercial viability, second is potential to contribute to market development.

Box 7 Public–private infrastructure advisory facility

Conclusion: Gender issues are not taken into account in either the overall design of the programme, or the specific regulatory and other activities undertaken through the programme. As this programme is so central to development of infrastructure in developing countries it is important to investigate this further and to ensure monitoring tools are extended to include gender and other social impacts.

No gender markers and no reference to gender equality or women’s empowerment in any of the documentation, including the recent Interim Strategic Review (Nov 2004)

Programme goal: Poverty elimination.

Programme purpose: To increase private sector involvement in infrastructure that benefits the poor. Programme outputs include: increased willingness by governments to introduce private sector in infrastructure; improved quality of regulatory frameworks; lower transaction costs for private investors; increased government capacity to negotiate and design contracts; improved info available to private sector about opportunities in IDA countries.

Progress reports: Latest OPR of Nov 2004 indicates PPIAF funded 32 activities aimed at assisting governments with policy, regulatory and institutional reforms, and infrastructure development strategies, and a further 18 activities aimed at building consensus and capacity; the bulk of PPIAF’s work is in this field.

Comments: Phone discussion with Project Manager (based at partner/World Bank in Washington) referred to PPIAF’s role of facilitation (rather than delivery), working with developing country governments to establish policy and regulatory frameworks for improved engagement with private sector involved in infrastructure provision. Said they do consider pro-poor impacts of those frameworks but essentially not concerned with the ‘downstream’/delivery end of the process; focus only on the ‘upstream’ policy level. OPR raised issues to be addressed in future, notably costs versus subsidies to achieve social objectives, and development of opportunities for expanding services to poorer and under-served communities by application of non-traditional small-scale mechanisms in public-private partnerships. Both these issues have significant gender implications and could have been explored in the Strategic Review, but weren’t. TORS did not make any reference to this aspect, but the Review itself concludes more attention needs to be paid to outcomes (rather than just outputs) including social impacts, and recommends PPIAF should strengthen poverty reduction analysis.

4.3 Review of studies contributed by DFID to the 2005 World Development Report

4.16 The object of these case studies (see table 5 for a full list) was to examine three aspects of the investment climate as it affects developing countries:

- The role of investment climate improvements in accelerating economic growth and poverty reduction;
- Good practice in reforming the investment climate; and
- The role of international co-operation in supporting reform efforts.

4.17 To summarise, of the sixteen studies none makes reference to gender equality or links economic growth with gender equality (which is relevant to the first aspect listed above), despite this linkage having been well recognised as essential to pro-poor growth. Only one of the studies makes any reference to the role of women, in the context of their dominance of the small enterprise sector.³⁰

4.18 It is recognised that this is not a wholly fair critique of the papers as they were not specifically intended to deal with gender or other forms of exclusionary analysis. However, within the objectives listed above, particularly the first, there was scope for offering at least a passing comment on gender issues in relation to those topics where different impacts on men and women are significant (for example, the use of migrant remittances, and the type of work by which they're obtained, varies considerably between women and men in some cultures; so too does implementation of corporate social responsibility standards, and civil society engagement.)

³⁰ White, S (Nov 2003), "Donor experiences in supporting reforms to the investment climate for small enterprise development"

Table 5 Case studies contributed by DFID Growth and Investment Group to the World Bank’s World Development Report, 2005

<i>Title</i>	<i>Author</i>
Overview of findings from 16 case studies	Investment, Competition and Business Development Services Team, DFID and Bannock Consulting Ltd
1 Foreign Direct Investment (FDI) Promotion:	
Lessons from CBC Business Environment Surveys 1999, 2001, 2003	Gregor Mackinnon
Lessons for Development from London Business School’s Centre for New and Emerging Markets (CNEM) Research Project ‘Investment in Emerging Marketing ‘	Saul Estrin and Klaus Meyer
Investment for Development Project (IFD) – Civil Society Perceptions	Pradeep Mehta
Creating FDI Friendly Environment in South Asia	David Irwin
Investment Climate reform in South Africa	Brendan Vickers
OECD (UK & European Union) Home Country Measures and FDI in Developing Countries; A Preliminary Analysis	Dirk Willem te velde
Migrant Remittances and the Investment Climate: Exploring the Nexus	Cerstin Sander
2 Promoting Indigenous Enterprise and SME Growth	
The Importance of the Enabling Environment for Business and Economic Growth: A 10 Country Comparison of Central Europe and Africa	Graham Bannock, Matthew Gamser and Mariell Juhlin Bannock Consulting
Donor experiences in Supporting Reforms to the Investment Climate for Small Enterprise Development	Simon White
The Investment Climate in South Africa – Regulatory Issues: Some insights from the high-growth, export-oriented SME Sector	David Christianson SBP
Improving the Business Trade Licensing Reform Environment	Matthew Gamser
Less is More: Better Compliance and Increased Revenues by Streamlining Business	Cerstin Sander
Investment Climate Reform in Ukraine	Peter Fortune
3. Competition Policy and the Investment Climate	
Investment Climate Reform: Competition Policy and Economic Development: Some Country Experiences	John Preston
Competition Law and the Investment Climate in Developing Countries	Simon J Evenett
Some Lessons from the CUTS 7-Up: Comparative Competitive Policy Project	Peter Holmes

4.4 Review of ‘How to ... ‘ and briefing notes

4.19 ‘How to ...’ notes have been produced over the past couple of years on the following topics by different teams within the Growth and Investment Group. These notes are available to non-DFID staff as well as DFID advisers, either by contacting a member of one of the teams, or by downloading from the DFID or Overseas Development Institute (ODI) website³¹:

- note 1: How to harness the private sector for pro-poor growth.
- note 2: How to assess and improve the investment climate.
- note 3: How to promote competition law and policy.
- note 4: How to support business development services.
- note 5: How to develop the financial sector for poverty reduction.
- note 6: How to approach international financial standards and codes.
- note 7: How to promote good corporate governance.
- note 8: How to approach corporate social responsibility.

³¹ www.odi.org.uk/publications

4.20 Only notes 4 and 5 make any reference to women, and none make references to gender equality or mainstreaming. Both the references to women are in the context of managing micro-level projects for poor women:

- note 4 says: ‘consider É. whether [this] will contribute to increasing employment generally, and for women or minorities in particular. ‘
- no 5 refers to the valuable role of micro-finance institutions in building up skills and networks ‘especially for poor women ‘; then under the listing of market failures in the financial sector there is reference to difficulties of access to finance for ‘the poor, women and other marginalised social groups ‘.

4.21 The Pro-Poor Growth Team has also produced two briefing notes:

- briefing note 1: ‘What is pro-poor growth and why do we need to know?. ‘ This is accompanied by a technical annex ‘How to calculate the rate of pro-poor growth ‘
- briefing note 2: ‘How to accelerate pro-poor growth: a basic framework for policy analysis. ‘

4.22 Briefing note 1 makes no reference to gender equality or women’s economic status. Briefing Note 2 refers to ‘institutional and social obstructions to entry, which can be reduced by breaking monopolies, liberalising internal trade and attacking discrimination, for example against women, old people, the disabled and ethnic or religious minorities. ‘ It also presents a table showing that ‘in Bangladesh poverty rates were unusually high among households with no adults of working age, or headed by women, or affected by long-term illness ‘ thereby linking women into the welfare/poverty alleviation approach.

4.23 It should be noted, however, that the Pro-Poor Growth Team, now recognising the importance of bringing into the picture more forcibly, the need to reduce inequality at the same time as focusing on achievement of economic growth, is producing a third Briefing Note dealing with inequality. Also, the ICEE team which has produced most of the ‘How To ...’ notes has suggested an outcome of this gender thematic paper could be an additional ‘How To ...’ note on ways of incorporating gender policies into enabling environment programmes. This, and discussions with members of the various Teams, reflects a real concern to integrate gender inequality and women’s empowerment issues into programmes but that there is a lack of knowledge and confidence as to the best way this should be done. One of the objects of the full evaluation, therefore, should be to recommend ways that can take forward the learning and how it can contribute to future training and policy guidance to ensure gender issues are better integrated in future.

5 Summary of outcomes, impact and contribution of DFID interventions

5.1 Study of the documents relating to the sample of DFID enabling environment programmes suggests that in many instances *gender is being sidetracked rather than mainstreamed* in programme design and implementation in any consistent or meaningful way, and that it is given less attention now than it was eight years ago. This is not necessarily because there is dilution of interest or avoidance of gender issues. It may be that changes in aid modalities (SWAPS and GBS funding) have made it harder to keep a track on gender because it is getting lost in a myriad of programme components and less direct management of programme inputs. There also appears to be uncertainty, perhaps a lack of understanding, as to how gender can or should be mainstreamed into these larger programmes, and who should take responsibility for doing so amongst DFID staff (eg Social Development Advisers or the programme's lead adviser?) and between programme partners.³²

5.2 ***Nor is the link between pro-poor growth and gender being made strongly enough.*** Arguments supporting the link between growth and development are widely cited (ie the economic growth paradigm), and gender is consistently referred to in poverty analyses for PRSPs (ie poverty alleviation paradigm), but the connection across and between these two viewpoints is less evident. And even more rarely is the connection made between these viewpoints and the women's empowerment perspective, with the result that attention to women's special needs – the second track of DFID twin-track gender policy – has been almost entirely lost in enabling environment programmes.

5.3 Although gender equality in relation to economic reform features strongly in DFID public policy documents (eg the White Paper, and the TSPs), it is rarely referred to in internal documents (eg the briefing and 'How to ...' notes). There also appear to be differences between what happens at DFID policy-making level (ie in Policy Division where both the Notes and public policy statements are formulated), and what happens at country level. It could be expected that country advisers who are actually engaged in 'on the ground' negotiations with partner governments and donors would take the opportunity to champion gender issues in keeping with DFID established international lead in this area.

5.4 It appears, however, that ***opportunity has often been missed***, and one wonders why: is it because of a lack of understanding about the links between economic growth, poverty and inequality? Is it because of a lack of skills to integrate gender and other forms of social exclusion analysis into macro-level programmes? Or is it because there is a lack of political will? Is gender equality and women's empowerment given low priority in the list of funding conditions in negotiations with governments? 'Negotiations' necessarily mean trade-offs take place, and in some parts of the world 'gender speak = women's rights' is an uncomfortable topic. Is it easier to forego inclusion of gender and women's rights in discussions with these governments in order to achieve other objectives, and to avoid any clash of interests which go to the cultural heart of inequality? Similarly, is donor harmonisation on broad economic interests more important than agreement to tackle gender inequality as a cause of low growth rates?

³² Moser, C et al (Oct 2004) "DFID Malawi Gender Audit: Evaporated, invisibilized or resisted?"

5.5 Several external studies have found policy commitments are not backed up by implementation plans and resources.³³ The recent Gender Audit of DFID Malawi³⁴ concludes that ‘there is resistance both within DFIDM and in the wider environment towards a specific gender strategy External influences relating to donor harmonisation over the (Malawi) PRSP means that DFIDM’s strategy overall has shifted from a human rights-based to a poverty reduction strategy. Gender mainstreaming accordingly has shifted from an equality issue in 1998 to one associated with vulnerable groups.’ The findings of this study support that conclusion: that **there has been a shift away from a focus on women’s rights towards focusing on the welfare needs of poor women and men**, as was indicated by the decline in the numbers of programmes with a gender marker (4.1).

5.6 Moser also goes on to question the role that **donor harmonisation plays in the dilution of gender issues**: ‘Donor harmonization on GM is important but limited by the lack of widespread commitment to GM in many other agencies.’ Given that DFID is the biggest donor in Malawi why is it not using its influence to push for inclusion of its stated policies on gender? The ICEE Review of Enabling Environments makes the point that ‘DFID is considered to be one of the leading bilateral donorscontributing to better understanding the need for, and process of, reformalways searching for better ways of doing things.’ All of which places DFID in a position of strength to push (albeit very gently if needs be!) for a greater inclusion of gender even in those countries and policy areas where it is a sensitive subject.

5.7 The full evaluation can contribute to DFID taking forward a gender agenda in enabling environment programmes. To do so, however, it is necessary to ground in sound evidence the links between reducing gender inequality and economic growth, and achievement of the MDGs. This **need for a stronger evidence base linking gender and pro-poor growth** was raised several times during meetings with members of the Growth and Investment Teams, and as mentioned above, the Malawi Gender Audit suggests there is need for knowledge deepening and skills training in how to implement gender focused strategies across the new aid modalities.

5.8 It is clear there is a knowledge gap that needs to be filled with clear examples from sound research as to the links between gender inequality and poor economic growth and this could be addressed in the full evaluation. It should also provide an opportunity for examining **potential gender monitoring tools in the contexts of the new aid modalities** generally, and within enabling environment programmes in particular. Since little has been done in this field to date, by DFID or other donors, research of this nature would restore DFID lead in approaches to gender mainstreaming and women’s empowerment.

³³ For example, Macdonald, M. (March 2003) “Gender equality and mainstreaming in policy and practice of DFID”, Gender and Development Network (GADN),

³⁴ Moser, C et al (Oct 2004) “DFID Malawi Gender Audit: evaporated, invisibilised or resisted?”

6 Moving forward – a framework for full evaluation

6.1 Underpinning hypotheses

6.1 The full evaluation needs to investigate two perspectives:

- the process by which gender has (or has not) been integrated into enabling environment programmes, and how it has been treated within those programmes
- the outcomes of enabling environment programmes in terms of their impact on gender equality and women's empowerment.

6.2 The 'quick and dirty' findings of this preliminary review suggest there are two underpinning hypotheses that need to be tested:

- that (by and large) gender has not been integrated into enabling environment programmes, and nor is it likely to be if programme focus and logic continues as now to be driven principally by unconditional economic growth. Also, that when it is integrated it is usually confined to the context of poverty alleviation and treats poor women and men as homogenous groups. Suggested reasons for this include the sub-hypotheses:
 - change in aid modalities and funding, and
 - lack of institutional capacity in the light of these changes at both country and policy division levels.
- that DFID enabling environment programmes (by and large) have not had an impact (or sufficient impact) on gender equality and women's empowerment, and are unlikely to contribute to achievement of the MDG target to halve poverty by 2015. Suggested reasons for this include the sub-hypotheses:
 - women's issues are not adequately dealt with in models that promote economic growth without reducing inequality, and
 - lack of, or inconsistency in, use of gender and social exclusion analyses at all stages of programme design, implementation and evaluation.

6.3 Other issues which need to be explored in the full evaluation include:

- the extent to which DFID EE programmes focus on informal and formal micro- and small enterprises in the context of private sector development.
- the extent to which interests of micro and small enterprises and women entrepreneurs are represented in business associations and other civil society advocacy organisations supported by DFID EE programmes.
- the extent to which women's civil legal issues (eg land rights and tenure; rights to retain cash from their earnings) are dealt with in the context of EE programmes aimed at reforming commercial legislation and regulatory frameworks.
- the development of sound evidence base about the links between gender equality and economic growth, and potential gender monitoring tools for GBS and SWAPS.

6.2 Conceptual framework

6.4 Both of these two hypotheses can be explored in the context of the conceptual framework outlined in Section 2 of this report which provides opportunity to define

programme objectives in relation to gender equality and women's empowerment, and to undertake analysis of anticipated impacts on gender in the context of those objectives. It encourages thinking about the distinction between unconditional economic growth, pro-poor growth, and poverty alleviation; also human rights and women's empowerment linked to access to markets and economic resources.

6.5 The kinds of questions it facilitates are: what are the objectives of the programme – Growth? Poverty alleviation? Empowerment? What are the linkages between these perspectives? Where do they 'meet'? Where do they 'separate'? How can they be more closely linked to achieve pro-poor growth based on gender equality? What was the process in deciding those objectives? How has process affected outcomes?

6.6 There also needs to be investigation of the links between both the process and outcomes of enabling environment programmes, and the process and outcomes of the other gender themes to be evaluated. The framework can also contribute to this wider investigation by asking (for example): how has priority of the unconditional economic growth model (or a weakly focused pro-poor growth model) determined the level of resources that are subsequently available for health, education and welfare services? How can choice of economic reform processes contribute to women migrant workers' employment options? How can pro-poor economic growth contribute to social rehabilitation following conflict? (eg by helping to create stability that encourages external investment, and gives poor people confidence to make 'livelihood roots' rather than fear further upheaval). How can pro-poor economic growth contribute to increased engagement of women in democratic processes? (for example, by better education, by contributing to social and cultural change, and increased mobility).

6.7 This type of analysis can form the strong evidence base about the links between gender equality and pro-poor growth that is largely missing at the moment (Klassen and others excepted), and for which Growth and Investment Group members and in-country Private Sector Development advisers are asking to assist them in their negotiating work with governments receiving general budget support.

6.3 Indicators

6.8 In her Gender Audit of DFID Malawi, Moser makes the point that policy evaporation is less likely to occur when programme logframes contain gender-focused indicators.³⁵ Only two of the seven programmes examined for this study contained gender indicators: Mozambique PROAGRI (with an S gender marker) included gender equality in the purpose statement and women's participation in the corresponding Objectively Verifiable Indicator (OVI). The Kenya Deregulation Project (with no gender marker) put 'equal opportunities for men and women' in the purpose statement, and had an OVI against an activity to prepare an issues paper on gender and deregulation.

6.9 The precise indicators that will need to be employed on this full evaluation will vary from programme to programme. However, there will be some indicators that are core to both the process and outcome/impact hypotheses outlined above. Several multi-laterals

³⁵ Moser, C et al (Oct 2004) "DFID Malawi Gender Audit: Evaporated, invisibilized or resisted?"

and some bi-laterals have developed gender-focused surveys for use in both contexts, and a couple of these (for the OECD and World Bank) are included in the Appendices. Similarly the Beijing PfA indicators discussed in Section 2 can be used, and Canadian International Development Agency (CIDA) has produced a comprehensive guide to assessing gender impacts of trade-related capacity building.³⁶ Although some of these are in the form of questions to be asked of programme stakeholders they can easily be turned around into indicators and assigned measurable values.

6.10 Alternatively DFID could simply use its own 'measures' that are stated in the TSP (see back to 2.4) as the basis of an indicator table. This could form one side of a matrix, and the other side could be the three core elements of enabling environment programmes (policy, legal and regulatory, institutional and organisational frameworks). The EE programme could be analysed from a gender perspective in the context of that matrix; indicators could then be established based on that analysis. Critical to getting the support from programme managers and DFID advisers for the evaluation, however, is to involve them in the selection of indicators both with regard to process and outcomes.

6.4 Methodology:

6.4.1 Criteria for programme selection

6.11 It is suggested the list of sixteen areas (see back to Table 2) contained in the ICEE Review should form the basis for selection of programmes, together with activities and instruments listed in the ICEE Review (see back to Table 3). Whilst a degree of objective, random, selectivity is critical to reduce bias in favour of programmes regarded as 'successful' in terms of mainstreaming gender and achieving positive impacts, in order to encourage ownership of the process of investigation, selection should be undertaken in partnership with members of the UK Growth & Investment Team, and liaison with the relevant Country Directors and Advisers.

6.4.2 Method of investigation

6.12 It is clear from this brief review of a sample of programmes that gender markers are not a reliable indication of whether gender has been integrated into enabling environment programmes; also that desk research relying on programme documentation is not adequate and needs to be supplemented by in-country programme assessment. In-country evaluation of a range of programmes is therefore essential to supplement desk research. Further, quantitative data needs to be backed up with qualitative research, based on participatory methodologies, and in-depth case studies. This is particularly important with regard to understanding DFID and programme staff's viewpoints and institutional issues regarding the process, as well as clients' viewpoints with regard to outcomes and impacts.

6.4.3 Tools

6.13 There seems little point in reinventing the wheel – or rather, in this case, rewriting survey questionnaires. Several donors have produced excellent tools and materials, a couple of which are contained in the Appendices and further ones are available on the web. These can form the basis of structured and unstructured interviews with both clients and staff of programmes.

³⁶ CIDA 2004 "Gender Equality and Trade Related Capacity Building: a resource tool for practioners" available to download from the CIDA website www.acdi-cida.gc.ca

6.4.4 Data analysis

6.14 In addition to using data collection tools that already exist, there is a great deal of information already being collected by national governments about formal and informal SMEs as well as employment by large firms and industrial sectoral analysis. There is also a range of existing data of a general nature (eg household surveys, PRSP monitoring teams, GEMINI studies of SMEs). Donor agencies also conduct regular surveys (eg UNDPs Human Development Index; World Bank's Cost of Doing Business Surveys, World Bank Genderstats). All of these can help with providing some core data for assessing outcomes and impacts, but the problem with this mass-collected data is that it rarely disaggregates by gender and social division. Also, it is often at least a couple of years out of date, and it gives no 'story' behind the figures. And it is often difficult to make comparisons across data sources (eg how to compare the World Bank's Cost of Doing Business survey with the Africa Sovereign Credit Rating Initiative which was developed by United Nations Development Programme (UNDP) in 2002 as part of its support for the New Partnership for African Development (NEPAD)). These sources of data and analysis therefore need to be supplemented by qualitative, participatory methods.

7 Conclusions on methodologies, availability and quality of information for the task.

7.1 The sample review of programmes in this study showed there are serious limitations with the data and documentation available on PRISM and from country offices. The incomplete or inadequate documentation may be hiding, or not doing full justice, to the work that is taking place in-country by government and programme staff, and by both in-country and UK-based members of the Growth and Investment Group. It may also be hiding these same peoples' concerns about how to integrate gender into new aid modalities, particularly SWAPS and general budget support. In-country evaluation of a range of programmes is therefore essential to supplement desk research. Furthermore, in order to have available documentation such as OPRs, the sample of programmes selected for this study had all been running at least two years, or were now completed. Programmes that are currently running should also be included the evaluation to see if there is has been any recent change in practice.

7.2 It is also suggested that the evaluation should not end as soon as the final report has been presented. Rather, that report should make suggestions as to how it can become a learning tool at country and programme level, and within policy divisions and UK Growth and Investment Group teams, for example through delivery of short seminars and discussion groups, and drafting of guidance notes for staff of all disciplines. There should also be a review of how gender is both categorised and treated within programme documentation. In this way the findings of the evaluation can become the means by which a gender focus in all programmes, but enabling environment programmes in particular as this is where its loss is most keenly felt, is re-energised between now and 2015.

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Other documents referred to:

Documents relating to the Tracer Case Studies are listed at appendix C

Case studies prepared by DFID's Growth & Investment Group for the World Bank's World Development Report 2005 are listed at Table 5

Abbreviations

ACPP	Africa Conflict Prevention Pool
ADB	Asian Development Bank
BRAC	Bangladesh Rural Advancement Committee
BRIDGE	Gender and Development Information Service, IDS
CAP	Country Assistance Plan
CEDAW	Convention on the Elimination of all forms of Discrimination Against Women
CHAD	Conflict and Humanitarian Affairs Department
CIDA	Canadian International Development Agency
CPCS	Community-Based Policing and Community Safety Programme
CPPs	Conflict Prevention Pools
CSO	Civil Society Organisation
CSP	Country Strategy Paper
CSR	Corporate Social Responsibility
DAC	Development Assistance Committee, OECD
DAC-GENDERNET	Development Assistance Committee – Gender and Development Network
DBS	Direct Budget Support
DDP	Directors Delivery Plan
DDR	Disarmament, Demobilisation and Reintegration
DEVAW	Declaration on the Elimination of Violence against Women
DPKO	Department of Peacekeeping Operations
DRC	Democratic Republic of Congo
DTI	Department of Trade and Industry
DV	Domestic Violence
EC	European Commission
EDP	External Development Partner
EE	Enabling Environment
EFA	Education for All
EMAD	Europe, Middle East and Americas Division
EmOC	Emergency Obstetric Care
EU	European Union
FCO	Foreign and Commonwealth Office
FDI	Foreign Direct Investment
FGM	Female Genital Mutilation
GBIs	Gender Budget Initiatives
GBV	Gender Based Violence
GCPP	Global Conflict Prevention Pool
GE	Gender Equality
GoB/ I / N / P / SA / U	Government of Bangladesh / India / Nicaragua / Nigeria / Pakistan / Peru / South Africa / Uganda
GTZ	German Aid Agency: Gesellschaft für Technische Zusammenarbeit
HSR	Health Sector Reform
ICEE	Investment, Competition & Enabling Environment Team, DFID
ICPD	International Conference on Population and Development
IDB	Inter-American Development Bank and Fund

IDPs	Internally Displaced Persons
IDS	Institute of Development Studies, University of Sussex
IDT	International Development Targets
INGO	International Non-Governmental Organisation
ISP	Institutional Strategy Paper
JICA	Japan International Co-operation Agency
JRM	Joint Review Mission
KFOR	Kosovo Force
LMM	Lower Maternal Mortality
M&E	Monitoring and Evaluation
MDG	Millennium Development Goal
MMR	Maternal Mortality Ratio
MOD	Ministry of Defence
NGO	Non-Governmental Organisation
OECD	Organisation for Economic Development and Cooperation
OPR	Output to Purpose Review
OVI	Objectively Verifiable Indicator
PAD	Project Appraisal Document (World Bank)
PCN	Project Concept Note
PCR	Project Completion Report
PCRU	Post Conflict Reconstruction Unit
PEAP	Poverty Eradication Action Plan
PfA	Platform for Action
PIMS	Policy Information Marker System
PPA	Participatory Poverty Assessment
PRISM	Performance Reporting Information System Management
PRS(P)	Poverty Reduction Strategy (Paper)
PSA	Public Service Agreement
PSD	Private Sector Development
RBA	Rights Based Approach
RCH	Reproductive and Child Health
RGC	Royal Government of Cambodia
SAAW	Social Audit of Abuse against Women
SDA	Social Development Adviser or Service Delivery Agreement
SDD	Social Development Department
SED	Small Enterprise Development
SG	Secretary General, United Nations
SIDA	Swedish International Development Co-operation Agency
SME	Small and Medium Enterprise Development
SRHR	Sexual and Reproductive Health and Rights
SSAJ	Safety, Security and Access to Justice
SWAp	Sector Wide Approach
ToRs	Terms of Reference
TRC	Truth and Reconciliation Commission
TRCB	Trade Related Capacity Building
TSP	Target Strategy Paper
UAF	Urgent Action Fund
UN	United Nations

UNDP	United Nations Development Programme
UNESCO	United Nations Educational, Scientific and Cultural Organisation
UNFPA	United Nations Population Fund
UNGEI	United Nations Girls' Education Initiative
UNHCR	United Nations High Commissioner for Refugees
UNICEF	United Nations Children's Fund
UNIDO	United Nations Industrial Development Organisation
UNIFEM	United Nations Development Fund for Women
UNMIK	United Nations Peacekeeping Mission in Kosovo
UPE	Universal Primary Education
USAID	United States Agency for International Development
VAW	Violence Against Women
WHO	World Health Organisation
WID	Women in Development
WTO	World Trade Organisation

DFID, the Department for International Development: leading the British government's fight against world poverty.

One in five people in the world today, over 1 billion people, live in poverty on less than one dollar a day. In an increasingly interdependent world, many problems – like conflict, crime, pollution and diseases such as HIV and AIDS – are caused or made worse by poverty.

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- ensure that all children receive primary education
- promote sexual equality and give women a stronger voice
- reduce child death rates
- improve the health of mothers
- combat HIV and AIDS, malaria and other diseases
- make sure the environment is protected
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