



ADAPTATION FUND

AFB/EFC.28/9
18 October 2021

ADAPTATION FUND BOARD

Ethics and Finance Committee

Twenty-eighth Meeting

Bonn, Germany (held virtually), 14–15 October 2021

REPORT OF THE TWENTY-EIGHTH MEETING OF THE ETHICS AND FINANCE COMMITTEE

Agenda Item 1: Opening of the meeting

1. The Chair of the Ethics and Finance Committee (EFC), Mr. Mohamed Zmerli (Tunisia, Africa), opened the meeting and greeted the participants at 2:10 p.m. (Central European Time (UTC+1)) on 14 October 2021.

Agenda Item 2: Organizational matters

a) *Adoption of the agenda*

2. The EFC adopted the following agenda for its twenty-eighth meeting on the basis of the provisional agenda (AFB/EFC.28/1):

1. Opening of the meeting.
2. Organizational matters:
 - a) Adoption of the agenda;
 - b) Organization of work.
3. Annual performance report for fiscal year 2021
4. Financial issues:
 - a) Financial status of the Trust Fund and CER monetization;
 - b) Reconciliation of the administrative budgets of the Board and the secretariat, the evaluation function and the trustee for fiscal year 2021.

5. Report of the Chair of the Technical Evaluation Reference Group, including:
 - a) Draft evaluation policy of the Adaptation Fund;
 - b) Mid-term review of the Medium-term Strategy.
6. Management response to the mid-term review of the Medium-term Strategy.
7. Update on implications of the fiduciary issues related to the United Nations Development Programme.
8. Other matters.
9. Adoption of the recommendations and report.
10. Closure of the meeting.

b) Organization of work

3. The EFC adopted the organization of work proposed by the Chair based on the provisional timetable set out in the annotated provisional agenda (AFB/EFC.28/2).

4. In accordance with paragraph 29 of the rules of procedure, the Chair then called upon all EFC members to orally declare any conflict of interest that they might have with any item on the current meeting agenda. He also drew attention to the Code of Conduct and Zero Tolerance Policy for the Board, which were available on the website of the Fund.

5. Mr. Aram Ter-Zakaryan (Armenia, Eastern Europe) declared a potential conflict of interest in relation to matters concerning the United Nations Development Programme (UNDP), notable those to be discussed under agenda item 7.

Agenda Item 3: Annual performance report for the fiscal year 2020

6. The representative of the secretariat presented the annual performance report (APR) for the fiscal year 2021 (AFB/EFC.28/3), covering the progress made on implementing the Medium-term Strategy during the reporting period, as well as analysis of information gathered since the Fund's inception, information on countries eligible for requesting additional funding under the newly increased country cap, and regular and COVID-19-related project change requests received, among others.

7. Committee members welcomed the report and commended the wealth of information provided and the clear structure of the report, which was aligned with the three pillars of the Medium-term Strategy. They also posed a number of questions, including regarding the average time between a project proposal's submission and approval; project performance report ratings; the Fund's core indicators; and funding allocated to outcomes 7 and 8 of the Fund strategic results framework.

8. With respect to the average time from a project's submission to its approval, the representative of the secretariat explained that the average time had surpassed the target in fiscal year 2021 partly because in two cases, the implementing entity had entered the reaccreditation stage after the proposal's submission for the Board's consideration. In such cases, the project was approved "pending accreditation" and hence had a longer approval period, skewing the average results.

9. Regarding project performance report ratings, she said that they were self-ratings, part of the section of the report where both implementing entities and executing entities were able to provide input on the project implementation progress and justify their rating. Most of the poor ratings in the 2021 annual performance report were related to project delays arising from the coronavirus disease (COVID-19) pandemic. She added that the secretariat normally contacted the implementing entity to investigate any element that caused concern during the secretariat's review of project performance reports, and implementing entities themselves often contacted the secretariat to highlight issues encountered during implementation. Furthermore, to mitigate challenges that entities might face, the Fund's policies include provisions on how to deal with project implementation delays, notably in the Policy on Project Delays and in annex 7 to the Fund's Operational Policies and Guidelines.

10. On the question of whether it was possible to add more indicators to the Fund's core indicators, the representative of the secretariat recalled that the Board had approved two impact-level results and five associated core indicators to increase transparency and demonstrate value for money and impact of investment for the Fund's overall portfolio, which was diverse, covering many different sectors and types of interventions. There were also other two core indicators not presented as part of the preliminary aggregation of Fund's indicators in the APR, specifically one focused on assets produced, developed, improved or strengthened and another associated with increased income or avoided decrease in income, as due to the diverse nature of investments, calculation of exact aggregate values was not possible. To provide a clearer picture of impact for every outcome and output of the Fund's strategic results framework, the project performance report included the "results tracker", where entities could provide information on progress under each outcome indicator of the results framework as well as each output indicator, and also report on things such as the specific sector of intervention and intervention scale and status. At the approval stage, projects had to be aligned with at least one Fund level outcome indicator and two core impact indicators, namely the number of direct and indirect beneficiaries plus one of the other five core impact indicators associated with the two impact-level results. The project performance report allowed implementing entities to provide the baseline and target performance information, as well as actual results at mid-term and completion. The secretariat was working on migrating the project performance report, along with the results tracker, to an online format, and hoped to be able to provide preliminary analysis on impact under each outcome and output indicator within two years.

11. The Chair of the Technical Evaluation Reference Group of the Adaptation Fund (AF-TERG) subsequently added that in her experience, thus far the indicators had mainly been used for monitoring. In developing the evaluation policy, which was aligned with the strategic results

framework as amended in 2019, the AF-TERG had recognized that the new evaluation policy should facilitate the Fund's need to measure impact through its core indicators and optimize the alignment of project monitoring plans with the results framework. The issue was an important consideration and would be covered during the consultations on the draft evaluation policy.

12. With respect to the low level of the total grant amount approved under the Fund results framework outcomes 7 and 8, the representative of the secretariat recalled that outcome 8 had only been introduced in 2019, when the strategic results framework had been revised to align with the new funding windows of the Medium-term Strategy. Regular projects have thus only been able to report investments against outcome 8 for the last two years; however, the figure was expected to rise now that more projects had been approved under the innovation facility. With respect to outcome 7, most of the funds in concrete projects and programmes were allocated to concrete investments rather than soft measures like capacity-building; however, despite the low level of fund allocation, good results had been achieved, with the approval or strengthening of 98 policies or strategies addressing climate change risks or incorporating climate change adaptation priorities, thereby improving resilience.

13. Having considered the report in document AFB/EFC.28/3, the Ethics and Finance Committee (EFC) recommended that the Adaptation Fund Board:

- (a) Approve the annual performance report (APR) for the fiscal year 2021 as contained in document AFB/EFC.28/3;
- (b) Request the secretariat to prepare a summarized version for the general public in a reader friendly format, following the approval of the APR by the Board.

(Recommendation EFC.28/1)

Agenda Item 4: Financial issues

a) Financial status of the Trust Fund and CER monetization

14. A representative of the trustee presented the Adaptation Fund Trust Fund financial report prepared by the trustee as at 30 June 2021 (AFB/EFC.28/4), as well as an update to 30 September 2021. At 30 September 2021, funds available for new decisions had amounted to US\$ 185.3 million. Taking into account the US\$ 29.6 million receivable under the multi-year donation agreement with Sweden, total potential funding availability, net of the operational reserve, was US\$ 214.8 million as of end-September 2021. The report to the end of September 2021 would soon be made available on the trustee's website¹.

15. A second representative of the trustee provided an update on the CER market and CER monetization. The Trustee has generated revenues of USD 208.7 million through the sale of over 31.2 million tons of CER since the start of the monetization program in 2009, at an average price

¹ <https://fiftrustee.worldbank.org/en/about/unit/dfi/fiftrustee/fund-detail/adapt>.

of US\$ 6.7 per ton. Since the end of 2020, CERs had been sold at an average price of just under US\$ 4 per ton, for proceeds of about US\$ 1.5 million. For the immediate future the trustee recommended continued focus on over-the-counter transactions as the most viable and cost-effective way to sell CERs for the Fund, although recently developed low-carbon compliance schemes, including the carbon tax, also merited attention, as did the climate neutrality drive, with not only United Nations organizations but also private sector institutions purchasing the Fund's CERs. The trustee would also be paying attention to developments under the Paris Agreement, in terms of a potential private sector mechanism and the implications for the Fund.

16. Subsequently, responding to a question, a representative of the trustee confirmed that the emission allowance of the European Union Emission Trading System had risen significantly, but explained that the Fund could not benefit from that system due to a cap on the number of CERs entities were allowed to use.

17. The Ethics and Finance Committee took note of the trustee's report (AFB/EFC.28/4).

b) Reconciliation of the administrative budgets of the Board and the secretariat, the evaluation function and the trustee for fiscal year 2021

18. The representative of the secretariat presented the reconciled administrative budgets of the Board and the secretariat, and the evaluation function for fiscal year 2021, covering the period from 1 July 2020 to 30 June 2021, and the representative of the trustee presented the reconciled budgets for the Trustee for the same period (AFB/EFC.28/5). Following the presentation, representatives of the secretariat and the AF-TERG responded to question from the Committee.

19. Regarding cost underruns in the "Environment and social safeguards & Gender" budget line and the reason gender training had not been organized in a virtual format when travel became impossible owing to COVID-19, a representative of the secretariat explained that the gender training has been planned to take place only once the updated gender policy and action plan were approved. As they were only approved in March 2021, and given that the training was a new initiative, the secretariat had not had sufficient time to organize the training before the year-end date of 30 June 2021; however, gender training for Board members was still planned.

20. Regarding the sharp increase in the "Accreditation system & others" line item, another representative of the secretariat confirmed that the overall workload of the accreditation panel had increased, and had been addressed with the introduction of support by an external expert, which had been very beneficial for the panel. In addition, the number of implementing entities had increased, to a total of 56, including 34 national entities. Accreditation work during the period had included additional intersession technical meetings, also adding to the workload.

21. Addressing questions on the budgets for the evaluation function, a representative of the AF-TERG secretariat explained that the AF-TERG had had an ambitious work programme for fiscal year 2021 even without the complications brought by COVID-19. Once the pandemic hit, elements of the work programme that required a local setting had been deferred to 2022, accounting in part for both the underruns of 2021 and the higher budget for 2022. At the same

time, work on the mid-term review of the Medium-term Strategy and the update of the evaluation framework had proved heavier than anticipated; in that regard, he recalled that the evaluation function was relatively young, with no history of previous work of that nature, making costs difficult to budget. That higher-than-expected cost was also a reason for the higher budget for 2022.

22. The Manager of the secretariat addressed the question of whether cost savings could be anticipated from the use of virtual working modalities on a more permanent basis in the future. He said that he expected more use of virtual tools in the future but that the need to meet stakeholders in person would also remain. A balance would likely be found between the two, but it was difficult to evaluate until travel became possible again. While ongoing uncertainty, combined with the ongoing growth of the Fund's portfolio, made it difficult to provide specific estimates with respect to projections, the secretariat would be pleased to accommodate the Board's view on the modalities of its own work.

23. The Ethics and Finance Committee took note of the reconciled budgets of the Board and the secretariat, the evaluation function and the trustee for fiscal year 2021, as set out in document AFB/EFC.28/5.

Agenda Item 5: Report of the Chair of the Technical Evaluation Reference Group

a) Draft evaluation policy of the Adaptation Fund

24. Introducing the item, the Chair recalled that the evaluation framework currently guiding the Fund's evaluation function had been endorsed in 2011. In May 2020, the Board approved a multi-year work programme for the AF-TERG that included a review of the evaluation function. Subsequently, based on the outcome of the review, which was presented to the EFC at its twenty-seventh meeting in March 2021, the Board requested the AF-TERG to prepare a draft evaluation policy for the Fund to replace the evaluation framework. The AF-TERG has completed the draft of the new evaluation policy but considered that it would benefit from broader consultation with internal and external Fund stakeholders. The AF-TERG also proposed to seek views of individual members of the Board, EFC and other Board bodies through a survey in December 2021. Following this widely consultative process, the AF-TERG proposed to submit the draft evaluation policy for the Committee's consideration at its twenty-ninth meeting, in March 2022.

25. The Chair of the AF-TERG presented an update on the progress on development of the evaluation policy for the Fund (AFB/EFC/28/Inf.3), outlining the main shifts with respect to the current evaluation function and the implications of those shifts in terms of costs and benefits.

26. Following her presentation, the Chair of the AF-TERG responded to questions from members. She explained that the AF-TERG was seeking a more integrated approach to evaluation, monitoring and learning through the evaluation policy, and involving the entire Fund, which were two of the key shifts involved in moving from the evaluation framework to the evaluation policy. Keenly aware of the need to avoid overburdening implementing entities, the AF-TERG was aiming for a more strategic approach to data collection and use of evidence, which meant a shift in approach rather than additional layers of reporting.

27. Asked about the links between the Medium-term Strategy and the evaluation policy, the Chair of the AF-TERG said that the policy had been developed in parallel with the mid-term review of the strategy and was thus closely aligned with the strategy and designed to be flexible and responsive as the Fund evolved. Another member of the AF-TERG added that main influence of the Medium-term Strategy was its strategic framing: the draft evaluation policy was designed to serve the achievement of the Fund's mission and vision but also its niche, which was well described in the Medium-term Strategy. The principles and criteria in the draft evaluation policy had also been designed around the three pillars of the strategy, namely learning and sharing, innovation and action. Thus, country-drivenness, learning, scaling, innovation and human and ecological sustainability were included in the draft policy as specific criteria aligned to the uniqueness of the Fund.

28. Lastly, responding to a question on how the evaluation work could inform the global stocktake process of the United Nations Framework Convention on Climate Change, which was meant to be a collective type of assessment, the member of the AF-TERG said that it would be important for the evaluation policy to take into account the work that the Fund is doing individually but also collectively with other climate funds, and should contribute to reviews that would be carried out and learning about adaptation by all climate change adaptation actors.

29. The EFC took note of the update on the progress on development of the evaluation policy for the Fund, as set out in document AFB/EFC/28/Inf.3, including the need for broader consultation of individual members of the Board, the EFC, the Project and Programme Review Committee and the Accreditation Panel.

30. On the topic of ex-post evaluations, she clarified that two such evaluations were currently being conducted by the AF-TERG, not the implementing entities. Ex-post evaluations were valuable in that they provided evidence and answered questions about sustainability and resilience of project outcomes years after project completion, which was particularly important in the face of climate change uncertainties. They also provided information on what worked and what did not, which would be increasingly important as the Fund's portfolio matured and sustainability actions would have to be built in. Such work could contribute to the wider field of climate change adaptation and evaluation, particularly in the context of vulnerability and risk.

b) Mid-term review of the Medium-term Strategy

31. Introducing the subitem, the Chair recalled that the Board had adopted the Medium-term Strategy in 2017, and in 2018 had approved the strategy implementation plan for the period 2018–2022. The Board had also requested the AF-TERG to undertake a mid-term review of the strategy and its implementation plan and to report to the Board at its thirty-sixth meeting. The AF-TERG had presented the emerging findings of the mid-term review to the Committee in March 2021 and had since finalized its report as requested by the Board.

32. The Chair of the AF-TERG then presented the report, focused on findings and recommendations of the mid-term review of the Medium-term Strategy of the Adaptation Fund (AFB/EFC.28/7).

33. Members thanked the AF-TERG for its work and its presentation and welcomed the overall positive results of the mid-term review while acknowledging the relevance of the findings and recommendations, saying that the review provided a good basis for the development of the next Medium-term Strategy.

34. With respect to recommendation (iii) in document AFB/EFC.28/7 (recommendation 4 in its annex), one member noted the differing views of the secretariat and the AF-TERG and suggested that they work together to better understand what each considered to be the needs, in terms of guidance and support, by the implementing entities, countries, non-governmental organizations and other stakeholders. and what key concepts, including innovation and adaptation, should be better measured or defined. Ideally, the outcome of that work would be reflected in the action plan, as well as in the ongoing implementation of the strategy and future reviews.

35. Responding to a request for additional information on recommendation (iv) in document AFB/EFC.28/7 (recommendation 3 in its annex), including on the expected outcome of the proposed discussion between the secretariat and the Board, a member of the AF-TERG said that the idea was to take stock now, one year before the end of the strategy period, and to have a discussion with the Board and the secretariat on whether the targets set four years ago were still relevant and achievable or should be modified. Such a discussion would also provide helpful lessons and inputs for the resource mobilization task in terms of what would be necessary and achievable for the next medium-term strategy.

36. A member of the AF-TERG also provided a clarification on recommendation (v), saying that the new players referred to were smaller, local, community-based entities such as those the Fund was attracting through the innovation window, for instance.

37. Finally, asked to expound on the mandate and responsibility of AF-TERG in the next strategy and the next steps for the final evaluation of current medium-term strategy, the Chair of the AF-TERG said that the AF-TERG would welcome the opportunity to contribute to the preparation of a future strategy, and considered evidence generation alongside strategy development particularly important, to inform a future strategy. In terms of the final evaluation of the current strategy, the AF-TERG was working on identifying the questions and evidence that would shape the final evaluation and could share the emerging findings of its work at a future EFC meeting.

38. The EFC agreed to consider agenda item 6 on the management response to the mid-term review of the Medium-term Strategy before formulating a recommendation covering both items.

Agenda Item 6: Management response to the mid-term review of the Medium-term Strategy

39. The representative of the secretariat presented initial management response to the mid-term review of the Medium-term Strategy by the AF-TERG (AFB/EFC.28/6). The initial response, which identified the extent to which the secretariat agreed with the report and provided an update on actions already being taken to address the recommendations, including an annex with specific responses to the findings, would be finalized following the thirty-seventh meeting of the Board, to

also reflect the discussions at that meeting and the current EFC meeting. The intention was to finalize the updated response within one or two months following the thirty-seventh meeting of the Board and to present it for approval during the intersessional period.

40. During the ensuing discussion, the representative of the secretariat provided clarifications in response to members' questions and comments. With respect to the recommendation for increased integration of the pillars of the Medium-term Strategy, he noted that it related to both the funding windows and the interloop between the three pillars; however, the secretariat did not see issues related to integration across MTS pillars, as entities were not currently constrained in their access to funding available under the Adaptation Fund. Furthermore, the secretariat considered that pursuing integration as an objective might create complexity and difficulties to funding access, both for the countries and for implementing entities.

41. On the question of the need for the Fund to take higher risk in relation to innovation projects, he said that the secretariat had understood the mid-term review report to call for the Fund to take on more risk for new windows like innovation, both in terms of financial risk and with respect to the nature of the projects to be funded. The secretariat considered the innovation window to be at a very early stage of implementation, with the concept of innovation still being clarified, and hence considered that the type of projects funded under that window already entailed additional risks compared to concrete projects. In terms of financial instruments, the Fund provides only grant elements, and any additional risks should be assessed against the grant provided to such projects; the secretariat did not see any additional instruments that could be mobilized by the Fund to take on additional risk. Thus, the secretariat's inclination was to wait to see what kind of projects were being funded under the innovation window before envisaging the assumption of additional risk.

42. The Manager of the secretariat added that the task force on innovation established by the Board was currently considering the question of risk and would eventually be able to provide further clarification on the matter.

43. A member of the AF-TERG explained that the criteria for innovation was very similar to the criteria for regular projects, and that the Board could discuss whether to provide for greater risk in the next Medium-term Strategy if it wished to take more risks in innovation, which was prone to lower success rates. Regarding work and interaction across the strategy pillars, the AF-TERG member indicated that the medium term review recommended that Fund recognizes innovation aspects in concrete projects and report on them.

44. The member of the AF-TERG also addressed the question of revising the targets of the implementation plan before the end of the period, which had been raised under the previous item. He said that Fund's contributor countries were likely to ask what the Fund had achieved, hence it might be better to revise the targets in the light of recent changes rather than have outdated targets that were not achieved. Revising the targets of the implementation plan did not, however, mean changing the Fund's long-term goals.

45. Having considered the report on the mid-term review of the Medium-term Strategy of the Adaptation Fund by the Technical Evaluation Reference Group of the Adaptation Fund (AF-TERG), as contained in document AFB/EFC.28/7, as well as the initial management response prepared by the secretariat, as contained in document AFB/EFC.28/6, the Ethics and Finance Committee (EFC) recommended that the Adaptation Fund Board (the Board):

(a) Take note of the key findings and recommendations of the mid-term review (MTR) of the Medium-term Strategy of the Adaptation Fund, including its annexes, and of the initial management response prepared by the Adaptation Fund Board secretariat;

(b) Request the Adaptation Fund Board secretariat to prepare an updated management response reflecting the views expressed by the Ethics and Finance Committee at its twenty-eighth meeting on the findings and recommendations set out in the MTR report, for approval by the Board during the intersessional period between the thirty-seventh and thirty-eighth meetings of the Board;

(c) Request the Adaptation Fund Board secretariat, in consultation with the AF-TERG, to prepare an action plan to respond to the recommendations arising from the MTR, reflecting the final management response, for approval by the Board during the intersessional period between the thirty-seventh and thirty-eighth meetings of the Board;

(d) Request the Adaptation Fund Board secretariat to report to the EFC, at its thirtieth meeting (October 2022), on the progress made in implementing the action plan.

(Recommendation EFC.28/2)

Agenda Item 7: Update on implications of the fiduciary issues related to the United Nations Development Programme

46. As he had declared a potential conflict of interest in connection with matters related to UNDP, Mr. Ter-Zakaryan was placed in a waiting room for the duration of the Board's consideration of this item.

47. Introducing the item, the Chair recalled that at its thirty-sixth meeting, the Board had considered the present issue under "Other matters" and had requested the secretariat to coordinate with the secretariats of the Green Climate Fund and the Global Environment Facility regarding fiduciary issues associated with projects implemented by UNDP and to provide the Committee with an update at its twenty-eighth meeting.

48. The representative of the secretariat then presented the secretariat's update on implications of the fiduciary issues related to UNDP (document AFB/EFC.28/8 – confidential).

49. During the ensuing discussion, members raised several concerns, including regarding the Fund's level of exposure given the relatively high number of Fund projects implemented by UNDP as included in annex 1 of document AFB/EFC.28/8. They also said that it was important to convey

to UNDP the EFC's concerns and the serious implication of the matter for the Fund and to ensure that the proposed review of UNDP's review of its compliance with the Fund's policy on fiduciary standards would be carried out by an entity that was not affiliated with UNDP in any way.

50. Having considered the update report in document AFB/EFC.28/8, the Ethics and Finance Committee (EFC) recommended that the Adaptation Fund Board:

- (a) Take note, with concern, of the update report by the Adaptation Fund Board secretariat, as set out in document AFB/EFC.28/8;
- (b) Request the secretariat to continue coordinating with the secretariats of the Green Climate Fund and the Global Environment Facility regarding fiduciary issues associated with the projects implemented by the United Nations Development Programme;
- (c) Request the United Nations Development Programme:
 - (i) To commission a review of its compliance with the Adaptation Fund's policy on fiduciary standards by an independent third party to be selected in consultation with the Adaptation Fund Board secretariat;
 - (ii) To assess any fiduciary issues that occurred on all projects already completed or at the completion stage, as listed in annex 1 to document AFB/EFC.28/8, in application of paragraph 33 of the Operational Policies and Guidelines for Parties to Access Resources from the Adaptation Fund as amended in October 2017;
 - (iii) To report on the status of the matters referred to in subparagraphs (c) (i) and (ii) above to the Board at its thirty-ninth meeting and provide the Adaptation Fund Board with regular updates on such matters and the outcome of the work as soon as they are available.

(Recommendation EFC.28/3)

Agenda Item 8: Other matters

51. No other matters were raised.

Agenda Item 9: Adoption of the recommendations and report

52. The EFC adopted the recommendations herein during the meeting and agreed to entrust the preparation of the report to the secretariat for later adoption. The present report was subsequently adopted by the EFC intersessionally.

Agenda Item 10: Closure of the meeting

53. The meeting closed at 4:20 p.m. (Central European Time (UTC+1)) on 15 October 2021.

ANNEX I

Ethics and Finance Committee Twenty-eighth Meeting Online, 14 and 15 October 2021

EFC members present in the meeting

Mr. Mohamed ZMERLI (Chair) (Tunisia, Africa)

Mr. Ibila DJIBRIL (Benin, Africa)

Ms. Ji Young CHOI (Republic of Korea, Asia-Pacific)

Ms. Sheyda Nematollahi SARVESTANI (Islamic Republic of Iran, Asia-Pacific)

Mr. Aram TER-ZAKARYAN (Armenia, Eastern Europe)

Ms. Eleonora COGO (Italy, Western Europe and Others)

Ms. Sylviane BILGISCHER (Vice-Chair) (Belgium, Annex I Parties)

Mr. Matthias BACHMANN (Switzerland, Annex I Parties)

Mr. Mattias BROMAN (Sweden, Annex I Parties)

Ms. Naima OUMOUSA (Morocco, Non-Annex I Parties)