

Advances and challenges in the process of institutionalizing the evaluation of climate policy in Mexico

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Abstract: At the beginning of this century, climate change was recognized by the Mexican government as a public problem, and over the years, a public policy for its attention was configured. In this last decade, legal actions have been promoted and dependencies have been created to introduce evaluation as an instrument that allows the improvement of the processes of construction and redesign of climate policy. Faced with this, this paper analyzes the process of institutionalization of the evaluation of climate policy in Mexico, in particular the advances in the administrative culture and the challenges that currently must be overcome to ensure that the legal-cultural system, created to evaluate the policy implemented to mitigate greenhouse gas emissions and achieve adaptation to the effects of climate change, allows evaluation to be assumed as a constant, necessary and priority activity in the formulation and decision-making processes.

Palabras clave: Institucionalización de la evaluación, política climática, instrumentos de política, cambio climático, gobierno mexicano.

Keywords: Institutionalization of evaluation, climate policy, policy instruments, climate change, Mexican government.

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1. Introduction

At the beginning of this century, climate change was recognized by the Mexican government as a public issue. Over the years, it was included in the government's agenda, and initiatives were taken to mitigate greenhouse gas emissions, to achieve adaptation to the effects of climate change and to reduce the vulnerability of natural and social systems. At the end of the first decade of this century, both internationally and nationally, some people question whether the climate initiatives implemented by the governments have had the expected results in society. Specially, how much have they solved, reduced, or changed the problem that caused them? How should we approach it so we can learn about it? Which guidelines should be used? Which methods? Which indicators should be used? How can the direct and indirect results, achieved in the medium and long term, be verified and attributed to the mitigation and adaptation measures implemented by the government? What changes or adjustments must be done?

Evaluation is the answer to these questions. It allows the formulation, implementation, and outcome of governmental activity to be evaluated in order to address the problems that are recognized as worthy of attention and action.

A process of institutionalization started in Mexico at the beginning of the last decade in order to establish evaluation as a constant, necessary and priority activity in the formulation and decision-making processes of climate policy. Within this context, we ask ourselves the following question: how has the institutionalization of climate policy evaluation in Mexico progressed? And which advances and challenges are being faced in order to make it a part of the management process of this policy?

2. A conceptual approach to the climate evaluation and its usefulness

Sometimes, policy analysis and evaluation can be confusing, however they are not the same. First, the analysis of public policies "intends to understand public problems and the way in which authorities carry out their decision-making processes for their solution" (Sánchez and Liendo, 2020: 125). On the other hand, according to Cardozo, Rosas and Sotelo (2014), the evaluation of public policies or public programs consists of "an interdisciplinary research with the objective of learning, explaining and assessing the level of achievements (results and effects) of public policies and programs by applying a systematic method; as well as to provide elements to the decision-making process in order to improve its effects". Thus, it cannot be understood as a separated process. On the contrary, it is an activity that creates new knowledge that can be used to modify or correct the evaluated agenda. This is knowledge to guide action and a permanent learning process and improvement of public policies and programs.

Cardozo, Rosas and Sotelo (2014) point out that its value in the public field lies in providing knowledge that allows governments to conduct, adjust, modify, or change their policies and programs, implemented to address public problems through the achievement of their objectives (effectiveness of its impact); while also providing accountability on government performance to society and contributing to a better use and assignment of resources.

Interest in climate change policy evaluation by academics, government officials and decision-makers, both nationally and internationally, began at the beginning of the second decade of this century (Mullan,

et al, 2013; Tompkins, et al, 2010; Deutsche, 2013 and Rosas, 2021a). Evaluation is now recognized as a necessary strategic activity for governments and decision makers, specially, for two reasons: 1) to learn in a specific time the importance or usefulness of climate policy, as well as the real effectiveness of the actions implemented to mitigate greenhouse gas emissions and to achieve adaptation to the effects of climate change, and 2) the amount of financial resources provided by national and international organizations to address climate change.²

According to Rosas (2019), Naswa, et al (2015); Mullan, et al (2013); Tompkins, et al (2010) and Price, et al (2015), evaluation is introduced, depending on its objectives, type and complexity, as an activity that contributes to: 1) increasing knowledge about climate change effects and vulnerability conditions as a basis for planning and decision making; 2) identifying areas that need to be improved and those that are developing properly, thus allowing us to make the necessary adjustments or to be more selective next time; 3) securing an effective resource assignment that addresses the most susceptible groups, areas and regions; 4) monitoring program tools (plans and actions) for mitigation and adaptation; 5) improving the accountability and communication with different national and international participants; and 6) contributing to knowledge and learning about good practices and failures of mitigation and adaptation actions.

However, literature itself has concluded that more development has been given to the evaluation of mitigation actions, rather than adaptation ones (Adger and Barnett, 2009; Mullan, et al 2013; and Tompkins et al 2010), mainly because "adaptation actions are unique and cannot be easily repeated. Design, implementation, and immediate benefits are specific from an area, and they are difficult to measure. Also, because the actions are linked to participative and multi-sectorial outlines for its implementation, which makes it more difficult not only for evaluating the actions but also designing evaluation systems" (Rosas 2021a: 99).

The evaluation of public policies, and specially of climate policy, has become an essential piece of the government's agenda and has gradually become part of the administrative culture of governments dealing with the climate change problem, that is, it has become institutionalized over time. Nevertheless, there is not only a model for the institutionalization of evaluation instruments, nor is it given, nor is it the same for all public policies. It develops according to the characteristics of the public policy to be evaluated and to a specific time, space, and scale. It is specific of an historical-temporal context and responds to the type of policy.

3. Methodology

To answer the questions brought up in this essay, we suggest three discussion threads: first of all, the role and importance of evaluation in the climate policy will be presented. Secondly, the efforts made by

² For example, Rosas (2019) points out that from 2003 until 2017 Latin America and the Caribbean received 3,09 billion USD from multilateral financial institutions, of which 84% of international funding was directed to mitigation projects and 14% was allocated to adaptation activities. Mexico is the second country in the region that has received funding from these institutions for this term.

the Mexican government to create an evaluation culture of climate policy will be presented too. Given this framework, and thirdly, the work developed by the current government in this area will be presented, emphasizing the challenges faced to ensure that evaluation is considered a constant, necessary and priority activity to improve the formulation and decision-making processes of climate policy.

A descriptive and explanatory approach is proposed based on a mostly qualitative methodology that allows carrying out an institutional analysis of the evaluation process in Mexico, mainly focused on the normative, organizational, procedural, and financial processes developed to make evaluation a constant, necessary and priority activity to improve the formulation and decision-making processes of climate policy.

Lastly, we use specialized literature, official documents, information retrieved from the National Transparency Website and other information requested from the National Institute of Ecology and Climate Change through the National Transparency Platform.

4. The evolution of Mexico's institutionalization of climate policy evaluation before 2019

At the beginning of this century, climate change was acknowledged by the Mexican government as a public issue. Over the years, it was institutionalized in the government agenda, specially, in the environmental agenda, and actions aimed to mitigate greenhouse gas emissions, to achieve adaptation to the effects of climate change and to reduce the vulnerability of natural and social systems. Thus, since the beginning of this century, climate policy has been shaped based on legal, program, institutional, knowledge creation and improvement, and financial instruments (see Chart 1).³

³ There are some proposals that allow to analyze public policies. One of them is known for focusing on public action instruments that are developed to address public problems. The most common are: i) regulatory instruments that concern actions that regulate the involvement of public authorities, ii) organizational instruments that concern public or mixed structures created or modified for public action in a certain area; iii) program instruments related to government documents that guide and delimit public action during a period of time; and iv) financial instruments related to those actions that allocate economic resources (public and/or private, national and/or international) to finance the implementation of government actions (Rosas, 2021b).

Chart 1. Climate Change Policy in Mexico

Type of instrument	Instrument
Legal	General Climate Change Act, 2012.
Programmatic	National Strategy on Climate Change 10-20-40. Special Climate Change Programs 2009-2012, 2014-2018, 2021-2024.
Institutional	Inter-Ministerial Committee on Climate Change, 2005. Council on Climate Change, 2013. National Institute of Ecology and Climate Change, 2013. National Climate Change System, 2014. Evaluation Coordination, 2015
Knowledge creation and improvement	National Emissions Registry. National Inventory of Greenhouse Gas and Compound Emissions National Risk Atlas. National Atlas of Vulnerability to Climate Change Climate Change Information System
Financial	Climate Change Fund, 2012. Transversal Annex of the Federal Expenditure Budget on Climate Change.
Evaluation	Coordination of the Evaluation of the National Climate Change Policy, 2012

Source: Own collected data based on Cámara de Diputados del Honorable Congreso de la Unión, CDHCU, 2012 and Rosas, 2021.

Regarding climate policy evaluation, it is worth noting that the General Climate Change Act, approved in 2012, institutionalizes the evaluation of government activities in this area.

This law sets out responsibilities, objectives, products, users, and the regularity of the evaluation (see Chart 2).

Chart 2. Climate Policy Evaluation in the General Climate Change Act

Elements	Description	Article
Responsible	Government officials should not only focus on formulating, directing, and publishing the National Strategy and the Climate Change Program, but also on carrying out their implementation, monitoring and evaluation.	7
Objective of the evaluation	To propose the modification, addition or partial or total reorientation of the National Climate Change Policy, including the National Climate Change Strategy, the Special Climate Change Program, and state and municipal programs, while considering adaptation and mitigation objectives.	98, 101, 102, and 103
Object of evaluation	All types of actions that are part of the National Climate Change Policy, including planning, economic, regulatory and information instruments, as well as actions aimed at providing public property and services.	4, 98-102
Results	Evaluation results, recommendations, and suggestions.	98
Users	Ejecutivo Federal, governments of the Federal Entities and Municipalities, Cámaras de Diputados y Senadores.	7, 8, 9, 98, and 105
Period	Every two years or longer.	104

Source: Cámara de Diputados del Honorable Congreso de la Unión, CDHCU, 2012 y Rosas 2021a.

Once this legal instrument was enacted, the institutionalization of evaluation began. It was characterised by the creation of specific bodies to establish evaluation as a part of the administrative culture, as well as to create a regulatory and procedural framework for carrying out evaluations and to start the first cycle of evaluation activities in some climate policy actions.

Regarding the organizational framework, two institutions directly linked to the evaluation are created: the Evaluation Coordination of Climate Change National Policy (EC) and the National Institute of Ecology and Climate Change (INECC). The first is assigned to manage the periodic and systematic evaluation of Mexico's climate policy, and to propose recommendations, additions or partial or total feedback of the climate policy based on the same evaluations (Art. 23 and 98). "Although the creation of the EC had been mandated since 2012, it was not until March 2015 when it was finally set up. By September of the same year, it had a three-year term work program already (2015-2018)" (Rosas, 2021: 101). During this time, the activities of the EC were mainly focused on four aspects (INECC, 2014; INECC, 2017a; INECC, 2018; Secretaría Técnica de la Coordinación de Evaluación, n.d., and Rosas, 2021a):

- 1) To establish regulatory elements for evaluation, which contribute to having, on one hand, a group of principles and rules that guide the behaviour of the members of the EC, and, on the other hand, a regulation of the organization and functioning of the coordination.
- 2) To specify the procedural framework for the evaluation, highlighting the following: the types of evaluation that can be applied to climate change (evaluation of design, process, results, impact and strategy, etc.), the time frame for requesting evaluations (last working day of November of each year), the instruments that can be evaluated (economic, regulatory and planning

instruments, actions aimed at providing public goods and services, environmental management instruments, information instruments for decision-making) and financing methods..

- 3) To identify national climate change policy monitoring indicators, which contribute to the design of a group of measures to assess the evaluation of the national climate change policy.
- 4) To guide the first cycle of evaluation instruments that make up climate policy. In 2017, the EC directed the first strategic evaluations of two climate policy instruments. The first one was related to the most important and representative financing instrument for the achievement of climate policy: the Transversal Annex of the Federal Expenditure Budget on Climate Change. The objective of the evaluation was to determine whether this instrument contributes effectively to the achievement of the objectives and goals of the National Climate Change Policy. The second evaluation was focused on the Special Climate Change Program 2014-2018 in order to find out why and how, in terms of its design, processes, and intermediate results, this program will achieve its objectives.

In 2018, the EC directed the strategic evaluation of the Subnational Advance of the National Climate Change Policy to review policies, programs, and public actions in terms of mitigation and adaptation in 6 states and 18 municipalities (INECC, 2017b and c).

We need to clarify certain issues in this matter, some of them were already discussed in a previous study (Rosas 2021). First of all, these evaluations were not carried out by the agencies in charge of coordinating the evaluation of public policies at the federal level in Mexico (the Ministry of Finance and Public Credit, the Secretariat of Public Administration, or the National Social Development Policy Evaluation Council). These agencies have succeeded in establishing evaluation, mainly of social policy, as a part of the administrative culture, that is, they have established the rules of how, by whom and when budget programs should be evaluated; they have coordinated evaluations and have been monitoring on what is done with the recommendations that come from them. They have also designed methodologies for their execution, in other words, they have managed to create a system for the evaluation of social policy. In the case of climate policy, a new body is deliberately created, the Evaluation Coordination, to evaluate climate policy in coordination and collaboration with the National Institute of Ecology and Climate Change, as it is discussed below. Even though the institutionalization of evaluation of climate policy was not based on the one created to evaluate social policy in Mexico, it is true that it allows to admit and assume that climate policy instruments cannot be evaluated with the same methodologies used to evaluate social policy.⁴

Secondly, to establish a normative and procedural framework and direct the first cycle of evaluations, the EC did not have its own economic, human, and material resources to carry out its activities. These resources were provided by the INECC, specifically by the General Coordination of Assessment of Climate Change Mitigation and Adaptation Policies, one of the seven administrative units of the INECC. This is because this unit was in charge of acting as the Technical Secretariat of the EC. However, the institutionalization of climate policy evaluation and, in particular, evaluation activities cannot depend on

⁴ To find out more about the methodologies used by the CONEVAL to carry out the evaluations, watch: <https://www.coneval.org.mx/Evaluacion/Paginas/Proceso-de-Evaluacion.aspx>

an administrative area, which is why from 2019 onwards it will be authorised to carry out different activities other than evaluation as it will be explained below, also this is the unit with the fewest staff. Evaluative work requires specific resource assignment to allow the EC to meet its objectives and to be sustainable within the timeframe.

Thirdly, the strategic evaluation of the Transversal Annex of the Federal Expenditure Budget on climate change costed \$804,750, and the strategic evaluations of the Special Climate Change Programme 2014-2018 and the Subnational Advance of the National Climate Change Policy costed \$812,000 and \$2,197,225.60, respectively. The EC did not have its own resources to cover the expenses, so they were covered by the budgets of the INECC and the bodies in charge of the evaluative actions instead. None of these evaluations attempt to assess the entire design and implementation process, or the intended or actual effectiveness, or the effects or impact of any of these climate policy instruments. They do not consider evaluations that would allow, for example, to analyse the results of the main program instrument, the Special Climate Change Programme 2014-2018, in terms of addressing the problem for which it was created; or that would allow to identify and measure the effects caused by its implementation or the effects caused by the Climate Change Fund.⁵

Furthermore, the second institution linked to the evaluation of climate policy is the INECC, created in 2013 with the objective of evaluating the fulfilment of adaptation and mitigation objectives, as well as the goals and actions included in the National Climate Change Strategy, the Special Climate Change Programme, and the programmes of the federal entities in climate change (Art. 15, frac. VI de la Ley General de Cambio Climático, CDHCU, 2012).

The evaluation of climate policy is one of the most innovative parts of the institutional structure of this organization. According to its Organic Statute, published on November 19th, 2014, one of the seven administrative units composing the INECC is the General Coordination for the Evaluation of Climate Change Mitigation and Adaptation Policies (CGEPMACC), which is in charge of: "(1) acting as the Technical Secretariat of the Evaluation Coordination, thus it must make its functioning and the implementation of its agreements easier; (2) developing inputs in order to define the regulations that guide the evaluation and technical tools for the evaluation, as well as promoting interaction between interlocutors; and (3) implementing the evaluation process in its different stages (planning; direct or through independent evaluating bodies execution; dissemination of evaluation results and management of recommendations)" (Rosas, 2021: 103).⁶

Given the importance of the CGEPMACC for the implementation of climate policy evaluation, it would be expected that it would have enough institutional power; however, up to 2018, it was the administrative

⁵ Data collected from Oficio RJJ.800.072/21 dated 8th October 2021 in which a response is given to a request for information to INECC through the Plataforma Nacional de Transparencia with the Folio 1612100014521 dated 14th September 2021.

⁶The other units are: Coordinación General de Adaptación al Cambio Climático, Coordinación General de Mitigación del Cambio Climático, Coordinación General de Contaminación y Salud Ambiental, Coordinación General de Crecimiento Verde, Unidad Ejecutiva de Administración; y Unidad Ejecutiva de Asuntos Jurídicos, Información y Transparencia.

unit with the smallest staff. By 2015, it had 5 staff members (3.4% of INECC's total staff) and by 2018 it had 8, which represented 2.9%.⁷

Despite the small number of staff members, the INECC, through the CGEPMACC, works directly with the EC in order to implement its agreements and, specially, to establish a necessary, regulatory, and procedural framework that allows evaluation to be included as a practice in governmental activity on climate matters, and to make the first evaluations of climate policy (first evaluation cycle). However, these evaluations are classified as internal, since they are carried out by the INECC itself, through the CGEPMACC. No external evaluators were hired and the INECC acts as both judge and party. This is another weakness of climate policy evaluations, since it is questionable whether the INECC is independent enough from the management authorities, on one hand, and whether the evaluations are impartial, on the other.

Another weakness of the evaluations lies in the fulfilment of the Aspects to be Improved (Aspectos Susceptibles de Mejora or ASM in Spanish), which represent those recommendations which come from the evaluations that were considered feasible by those responsible for the evaluated instruments, and they decided to commit themselves to address them. Until 2021, few recommendations are reported to have been fully completed. With the evaluation of the Special Climate Change Programme, 6 ASM were presented, of which only 2 are reported to be completed, with the evaluation of the Transversal Annex of the Federal Expenditure Budget on climate change there are 9 ASM, of which only 2 are reported to be completed, and of the 9 ASM that were presented based on the evaluation of the Strategic Evaluation of the Subnational Progress of the National Climate Change Policy, none are reported to be completed. It is worth mentioning that all the recommendations made are aimed to improve the design of the instruments evaluated.⁸

If the evaluators have made recommendations and suggestions and those responsible of the evaluated instruments, who know more about them, have selected only those that are possible to implement, why is it that almost three years after the last evaluation of the first cycle, the ASM are not fully completed? Therefore, what is the purpose of these evaluations? According to the terms of the General Climate Change Act, the evaluations should propose the modification, addition or partial or total reorientation of the instruments of climate policy. Are the evaluations carried out not relevant for decision-making?

As we can see, the first decade of this century witnessed the beginning of work that contributed to a legal, organisational, and procedural strategy that made it possible to incorporate evaluation as a necessary research activity, not only for the design of actions, but also to learn from the results of these

⁷ Data collected from the Directorio del Instituto Nacional de Ecología y Cambio Climático. Available in: http://portaltransparencia.gob.mx/pot/directorio/begin.do?method=begin&_idDependencia=16121, Accessed 27 Oct. 2015; and from the Sistema de Portales de Obligaciones de Transparencia del INAI, Capítulo X "Plazas de personal de base y de confianza" del artículo 70 de la Ley General de Transparencia y acceso a la información pública, in <https://consultapublicamx.inai.org.mx/vut-web/?idSujetoObligadoParametro=191&idEntidadParametro=33&idSectorParametro=21>, Accessed 2 Jul. 2018.

⁸ For further details about the ASM of each evaluation carried out, see <https://www.transparenciapresupuestaria.gob.mx/es/PTP/evaluaciones>, Accessed 30 Aug. 2021.

actions. There are also evaluative experiences that are qualified as internal. These evaluations, according to ASM's fulfilment, have not contributed to the improvement of policy instruments.

5. Advances in the institutionalization of climate policy? After 2018

On 1st December 2018, Andrés Manuel López Obrador (AMLO) was appointed President of the Mexican Republic after winning the elections of 1st July 2018. His victory represented the arrival of the first left-wing nationalist government in the history of Mexico, and, consequently, of a new national project with the objective of a structural change, which AMLO called himself the Cuarta Transformación (4T). A change that eradicates “the corrupt system of injustice and privilege”, where public servants must “put national interest before their own, no matter how legitimate it may be. The main objective is the transformation of the country”. A change that not only allows us to make the best decisions and do our best, but also to leave a historical mark and break with the past. A necessary strategic activity to achieve this is the evaluation of government action. Therefore, one would expect the institutionalization of evaluation, specially of climate policy, to be strengthened. However, that was not the case.⁹

In AMLO's government, the EC and the INECC continue to be the bodies directly linked to climate policy evaluation.¹⁰ Regarding the EC, it is worth noting that, in 2019, five of the six Social Counsellors that make up the EC were replaced, and there were no meetings this year, and, therefore, no agreements were reached in evaluation affairs. It is true that the periodic renewal of the EC does not imply getting rid of the advances achieved and trying to start all over again, but getting new knowledge, skills, and experiences that contribute to the evaluation work of climate policy or to avoid concentration of power, for example. Although, it is also true that replacing almost all the Counsellors at the same time and considering the time it took to complete the change¹¹, was counter-productive for the work they had been doing to establish climate policy as a constant and priority activity.

Moreover, if we check the work made by the renovated EC in 2020 and until early October 2021, it mainly focuses on activities that guide and direct its work (see Chart 3). A couple of activities that contribute to the evaluative work of climate policy also stand out for 2020. The first of them is the approval of the system of effectiveness and impact indicators that will guide the evaluation of climate policy, and the evaluation framework around the Nature-based Climate Action Solutions is also discussed. The second concerns the selection of the six programmes to be evaluated, but it is not until 2021 when meetings with those responsible for these instruments are held. Unfortunately, since the renovated EC started to work, no evaluation proposals are reported to have been sent to the Secretariat of Finance and Public Credit

⁹ A speech from Andrés Manuel López Obrados, President of the Comité Ejecutivo Nacional de Morena, during the III Congreso Nacional Extraordinario en la Ciudad de México, 11 June 2017, <https://lopezobrador.org.mx/temas/iii-congreso-nacional-extraordinario-morena/>

¹⁰ To find out about their work, a request for information was made to the INECC through the Plataforma Nacional de Transparencia with Folio 1612100014521 dated on 14 September 2021, and the reply was sent in the Oficio RJJ.800.072/21, dated 8 October 2021.

¹¹ It was not until 26 March 2020 that the members appointed as EC Counsellors were announced in the Diario Oficial de la Federación.

and to National Council for Social Development (CONEVAL in Spanish) to be considered for inclusion in next year's Annual Evaluation Programme, nor the type of evaluation to be carried out and the actors who will carry out the evaluations. This situation worsens if we consider the four-year mandate period of this new EC, 2020-2024.

Chart 3. Work carried out by the EC, 2020-until 8th October 2021

Year	Type	Activity
2020	Procedural	The new Evaluation Coordination is established
		Its work programme 2020-2024 is defined
	Knowledge creation and improvement	The concept of Nature-based Climate Action Solutions is defined
		The system of effectiveness and impact indicators that will guide the evaluation of climate policy is approved
	Evaluative	The selection of programmes to be evaluated is narrowed down (23rd November 2020).
2021	Procedural	The specific directions and guidelines that will guide the evaluation of the PNCC, the Internal Rules and the Code of Ethics for Evaluation Coordination are updated.
	Evaluative	Working meetings are held with the actors responsible for the six budget programmes to be evaluated.
		The proposal for an evaluation approach document on the Nature-based Climate Action Solutions is settled and discussed.

Source: Oficio RJJ.800.072/21 dated 8th October 2021 in which a response is given to a request for information to INECC through the Plataforma Nacional de Transparencia with the Folio 1612100014521 dated 14th September 2021; INECC, 2019; INECC, 2021.

Regarding the programmes to be evaluated, it is noteworthy that they are program instruments that do not have the objective of contributing to addressing climate change or, specially, mitigating greenhouse gas emissions or achieving adaptation to it (see Chart 4). They are programmes designed to contribute to social welfare, to improve access to the right of the city, to preserve natural areas and their diversity, to conserve hydrological infrastructure and to encourage food self-sufficiency. However, their actions specially contribute to achieve adaptation to climate change. However, the EC did not select any instrument that shapes climate policy (see Chart 1). We do not question the importance of evaluating the contribution of these programmes, but is it not time to know and evaluate the real effectiveness of the instruments that have been implemented and that make up climate policy? As well as to evaluate the usefulness of some of the instruments that were created years ago? It is worth remembering that evaluation is not limited to control the legality of public action or economic resources.

Chart 4. Budget programmes to be evaluated.

Budget programme	Objective
U0009: Epidemic surveillance	Contribute to social welfare and equality through the right and specific treatment for new cases of infectious and contagious diseases.
S273: Programme for urban improvement	Contribute to improve the access to the right of the city for people with medium, high, or very high levels of urban and social underdevelopment.
G013: National Protected Area System	Contribute to the conservation of the country and its biodiversity through the instrument of the Federal Protected Areas.
S217: Hydro-agricultural infrastructure support programme	Preserve and improving the hydro-agricultural infrastructure, as well as increasing the surface area under irrigation in technician rain-fed areas, in order to contribute to keeping production in irrigated and technician rain-fed agriculture; in addition to promote productive projects in target areas.
S219: Forest Development Support	Contribute to the protection, conservation, renovation, and incorporation of areas into community forest and management and strengthen local value channels.
Budget item 20. Welfare Secretary-	Contribute to social welfare through sufficient income, encourage food self-sufficiency, rebuild social structure and generate a productive inclusion of farmers in rural areas in order to make the land productive.

Source: Websites of different Mexican government agencies

Another notable aspect concerns the coordinating body for the evaluations of these programmes. Until now, the CONEVAL, the institution in charge of coordinating the evaluation of social development policies and programmes in our country, was responsible, but with this proposal it will be the EC, the body created to evaluate climate policy and, in particular, the degree of compliance with mitigation and adaptation actions. But what will be the objectives of the evaluations? Will they be evaluated in order to value and identify areas of improvement to address the problems for which they were created, or will they be evaluated to improve cross-cutting nature of these programmes with climate policy? Will the EC be able to make recommendations, additions or to feedback climate policy with these evaluations? In the other words, with these evaluations, will the EC be able to fulfil one of its original objectives? These questions will be answered in the evaluation proposals that the EC must send to the Secretariat of Finance and Public Credit and to National Council for Social Development (CONEVAL in Spanish) to be considered for its inclusion in the Annual Evaluation Programme.

On the other hand, the INECC underwent changes in its organizational structure, specifically in the administrative unit responsible for carrying out the EC agreements. This was reflected on 16th October 2019, with the publication of the agreement announcing the change of the administrative unit responsible for the evaluation of climate policy from the CGEPMACC to the Coordinación General de Divulgación, Seguimiento y Evaluación de Políticas Públicas de Cambio Climático (General Coordination of Dissemination, Monitoring and Evaluation of Public Policies of Change). Despite the importance of this administrative unit for the evaluation unit for the evaluation of climate policy, the truth is that its importance is belittled by this change, since, beside the change of its name, other powers different from

the evaluation of climate policy have been assigned to it. This is the case of those referring to:

- INECC's strategic planning.
- the management of information and knowledge about environment, ecology, and climate change.
- the connection of the INECC with the diverse agencies of the three levels of government, academic and research institutions, and national and international market society organizations.
- the exchange and generation of knowledge and good practices on climate change actions, projects, programmes, and policies.
- the incorporation of information required for the preparation of national communications and reports to the United Nations Framework Convention on Climate Change (UNFCCC); and
- the development and update of the climate change website.¹²

Powers that must be performed by the staff of the administrative unit. A review of the staff of this year (2019) shows that it has 3.1% of the INECC staff. If we compare it with the number of workers assigned in 2018, we can see that it has increased from 8 to 10 people (see Chart 5). Despite this increase, we can observe that it is still the unit with the fewest staff, even though, besides carrying out activities related to the evaluation of climate policy and implementing EC agreements, it must also fulfil the new duties derived from the change of the name of the administrative unit.

Chart 5. INECC Organizational Structure, 2021

Administrative Unit	Number of job vacancies	%
National Coordination for Climate Change Adaptation and Ecology	34	10.7
General Coordination of Climate Change Mitigation	25	7.8
General Coordination of Pollution and Environmental Health	96	30.1
General Coordination of Dissemination, Monitoring and Evaluation of Public Policies on Climate Change	10	3.1
Administrative and Finance Unit	94	29.5
Executive Unit for Legal Affairs, Information and Transparency	18	5.6
Directorate General	35	11
Staff Appointed to the Union	7	2.2
Total staff	319	100

Source: Own collected data taken from Plataforma Nacional de Transparencia, 2021.

Regarding the work carried out by the INECC on climate policy evaluation, this does not differ from the work done by the EC (see Chart 3 and 6). This is because the institute, through the responsible administrative unit, acts as the Technical Secretariat of the EC and implements its agreements. However, it is worth noting that in 2019, the year of renewal of the EC, it is the INECC, (not the EC) along with the Secretariat of Finance and Public Credit, the one that formalise the recommendations issued in the reports of the two evaluations carried out in 2017 to monitor the implementation of the ASM. The ASM, mentioned above, is a significant activity to ensure that the evaluations contribute to the improvement of policy instruments and those responsible for the instruments make decisions based on the results of the

¹² Section Five of the Agreement which announces the amendments, additions and repeals to various provisions of the Organic Statute of National Institute of Ecology and Climate Change, 2019.

evaluations.¹³

Chart 6. Evaluation work by INECC, 2019-2021

Year	Type	Activity
2019	Procedural	Announce the call for the appointment of new Social Counsellors that make up the EC in the Official Journal of the Federation of Mexico.
		Select the candidates for Social Counsellors.
	Evaluative	Along with the Secretariat of Finance and Public Credit, the recommendations issued in the reports of the two evaluations carried out in 2017 to monitor the implementation of the ASM are formalised.
	Dissemination	Organise the event “Lecciones Aprendidas de la Evaluación Subnacional de la Política Nacional de Cambio Climático” for the Evaluation Week 2019.
2020	Procedural	Establish the new Evaluation Coordination.
		Define the 2020-204 work programme of the Evaluation Coordination.
	Knowledge creation and improvement	Discuss with the EC the functioning of the National Atlas of Vulnerability to Climate Change and its relationship with the adaptation indicator of the Sectoral Programme on Environment and Natural Resources.
		Review, together with the EC, the effectiveness and impact indicators.
		Define the concept of Nature-based Climate Action Solutions.
		Submit the analysis of budget programmes linked to the Nature-based Climate Action Solutions concept to the EC.
	Evaluative	Together with the EC, the INECC narrows down the selection of programmes to be evaluated (23 rd November 2020).
	Dissemination	Submit to the EC the content of the Intergovernmental Panel on Climate Change Special Reports with a focus on Nature-based Climate Action Solutions.
2021	Procedural	Together with the EC, update the specific guidelines and criteria that will guide the evaluation of the PNCC, the Internal Regulations of the Evaluation Coordination and the EC’s Code of Ethics.
	Evaluative	Organise working sessions with the actors responsible for the six budget programmes to be evaluated.
		Complete and discuss the proposed evaluation focus document on Nature-based Climate Action Solutions.
		Conduct an analysis for the characterisation of the six budget programmes to be evaluated.

Source: Legal paper RJJ.800.072/21 dated 8th October 2021 in which a response is given to a request for information to INECC through the National Transparency Platform (Plataforma Nacional de Transparencia) with the File 1612100014521 dated 14th September 2021.

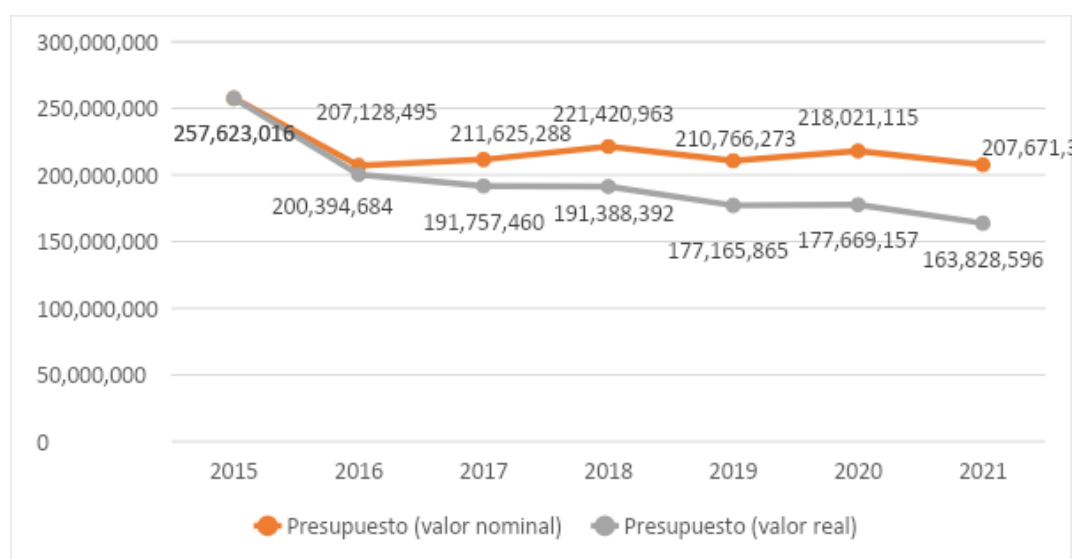
It is worth mentioning that the INECC has not received any external national or international funding to carry out its evaluation activities, it has been carried out solely with tax resources allocated in the Transversal Annex of the Federal Expenditure Budget, only for the payment of the wages of the people attached to this Administrative Unit (CGDSEPPCC), so that the activities carried out with the evaluation of climate policy from 2019 up until now have been performed with internal work, which have also been

¹³ It is important to clarify that the activities shown in Chart 6, which are carried out by the CGDSEPPCC, are not the only ones, since, as it was previously mentioned, it carries out other activities not related to evaluation.

carried out solely with human and material resources of the INECC.¹⁴

If we analyse the real allocated budget to the INECC (see Graphic 1) based on the percentage increase and we take the government preceding to AMLO's, we see that there was a decrease of 25.7% compared to 2015 in 2018, the last year of Enrique Peña Nieto's government. Now, if we analyse the budget allocated during the current government's mandate, nothing changes, because in 2019, the first year in which the federal executive introduces its Expenditure Budget, there is once again a decrease of 7.4% compared to the previous year. If we compare 2021 with 2019, there is a decrease of 7.5%. The situation is worse if we compared the 2021 budget with the 2015 budget because there is a decrease of 100%.

Graphic 1. Budget allocated to INECC, 2015-2021
(Mexican pesos, par and real value, base year = 2015)



Source: Federal Expenditure Budget for tax years, 2015-2021 and El Contribuyente, 2021.

The budget reduction is worrying, not only for the work that INECC carries out in terms of climate policy evaluation, but also to fulfil its main duty: to coordinate and carry out studies and scientific or technological research projects on climate change, environmental protection, and preservation and restoration of ecological balance.

This situation gets worse from 2022 onwards, since the joining of the INECC (staff and powers) to the Department of Environment and Natural Resources is established due to an overlapping of functions, according to the Department itself (SEMARBAT, 2021).

INECC's takeover weakens the performance and the importance that the INECC holds as a source of scientific knowledge necessary to understand and address environmental issues, including climate change, because it loses its technical and management autonomy. In Adrián Fernández's words:

¹⁴ Data collected from Oficio RJJ.800.072/21 dated 8th October 2021, in which a response is given to a request for information to INECC through the Plataforma Nacional de Transparencia with the Folio 1612100014521 dated 14th September 2022, page 5.

Not only will they lose technical and management autonomy, but also their importance. Like the INECC's case, there will be no institution with autonomy and quality science that will objectively carry out its significant tasks, such as the creation of national inventories of greenhouse gas emissions, studies and monitoring of air quality, climate change policies evaluation.¹⁵

6. Conclusion

Since 2012, with the publication of LGCC, the evaluation is taken as an essential activity in climate policy. However, the institutionalization of evaluation of climate policy in Mexico was not immediate. It was a process that began with the work developed by the EC and the INECC, which allowed for regulatory, organisational, and procedural frameworks that made it possible to establish evaluation as a part of the administrative culture of the federal government, but not only in normative terms, but also effective ones. An example of this is the teamwork between agencies that made it possible to carry out the first internal evaluations in 2017 and 2018, which focused on some elements of the design of the instruments, but not on their implementation or the effects or impacts that they caused. Strategic evaluations that identify areas to be improved and that one would expect to be considered to make adjustments or to correct evaluated policy instruments, unfortunately, considering the level of accomplishment of the ASM, they are not the case.

On the other hand, the work carried out during AMLO's government until 2021 does not continue the process of institutionalizing the evaluation of climate policy developed before AMLO. No process has been made in order to establish evaluation as a periodic, constant, priority and systematic activity within the federal public administration. No climate policy instruments have been evaluated from 2018 to 2021. Therefore, the EC has not suggested any recommendations or given any feedback to the policy instruments which have not ceased to be implemented, by the way.

The evaluations suggested by the EC to start with the second cycle of evaluative activities are characterised by not suggesting any policy instrument that has been designed exclusively in order to address climate change, or any instrument that seeks to mitigate emissions or the adaptation to its effects, which is the case of Special Climate Change Program 2014-2018 or Climate Change Fund. The challenge we face is to carry out evaluations of these and other climate policy instruments, mainly to evaluate their application and the effects and impact caused by them, as well as to modify or correct these instruments using the conclusions and recommendations that come from them.

The reduction of institutional powers, that the INECC and its General Coordination of Dissemination, Monitoring and Evaluation of Public Policies on Climate Change are suffering, deserves special attention, not only due to the reduction of its budget, but also because of the shortage of staff members and the strengthening of the powers of its administrative unit responsible for the evaluation of climate policy, which have nothing to do with those related to evaluative activity. Consequently, its importance has been belittled. This situation gets worse with the recent incorporation of the INECC into the SEMARBAT, as the

¹⁵Comment made in the virtual meeting “¿Qué implicaciones tiene la desaparición del INECC?” during the Seminario Universitario de Sociedad de Medio Ambiente e Instituciones of the UNAM (SUSMAI). Collected from <https://www.youtube.com/watch?v=UqMmR4oq-Xo>

agency loses management autonomy in order to create and develop new technical and scientific knowledge required for the formulation of new policies and, specially, in the work carried out in the evaluation of climate policy.

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