

World Bank - Grant Reporting and Monitoring (GRM) Report

Report to Donor

Ref. TF0A1122 Reporting Period: 11/18/2016 to 06/30/2020
Printed On: 03/18/2021 Report Type: Completion Report
Status: Final

Assignment: TF0A1122

Vietnam REDD+ Readiness Preparation Additional Funding

FCPFR - FOREST CARBON PARTNERSHIP FACILITY

Task Team Leader: 00000345871 - Lan Thi Thu Nguyen

Approving Manager: 00000208182 - Mona Sur

Summary Information	
TF Status	ACTV / LCLS
Recipient Country	Vietnam
Executed By	Recipient
Managing Unit	9532 - SEAE2
Grant Start Date / End Date	11/18/2016 to 06/30/2020
Original Grant Amount	5,000,000.00
Grant Amount	5,000,000.00
Outstanding Commitments	0.00
Cumulative Disbursements	4,522,060.55 as of 06/30/2020
Disbursed 11/18/2016 to 06/30/2020	4,522,060.55
Donor	TF602001 - MULTIPLE DONORS

This GRM report includes the following sections: Overview, Components, Outcome, Execution, Program (FCPFR), Completion, Disbursements, Procurement Plan, Procurement Actuals.

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OVERVIEW

Overall Assessments

Grant Objectives:

The Project Development Objective is to support Vietnam to become ready for future REDD+ implementation by preparing the key elements, systems and policies needed in a socially and environmentally sound manner.

Overall progress from 11/18/2016 to 06/30/2020 with regard to Achieving Grant Objectives:

Comment:

The FCPF grant made important contributions to REDD+ readiness in Vietnam. The project put in place the building blocks for REDD+ implementation, and included the development of policies and systems; support for adopting national REDD+ strategies; development of reference emission levels (RELS); the designing of a measurement, reporting, and verification (MRV) systems; and setting up REDD+ national management arrangements, including improvements to existing environmental and social safeguards. The grant also supported work on stakeholder consultations and engagement at different levels, including consultation work with forest dependent village communities, protected area management boards, state forest companies (SFC), district and provincial officials and non-government organizations. The grant strengthen capacity for REDD+ implementation at national and provincial levels, and provided policy and technical support, including for SFCs and Forest Management Boards (FMB) reform for REDD+ service provision, as well as private sector engagement. Significant gains towards REDD+ readiness were made during grant implementation and the project achieved the grant objectives (see key achievements below).

The Readiness grant also supported the development of the Vietnam Emission Reduction Program (ER-P) in the North Central Region (NCR) (P162605). Notably, this supported the Vietnamese Government to advance the development of the Emission Reductions Payment Agreement (ERPA) to a stage ready for negotiation and finalization. The ERPA was subsequently agreed and signed in October 2021, following grant closure.

Vietnam's REDD+ Readiness will contribute to the achievement of Vietnam's Nationally Determined Contributions (NDC) under the UNFCCC and to enhance livelihoods of forest dependent communities.

Overall progress from 11/18/2016 to 06/30/2020 with regard to Implementation of Grant Financed Activities:

Comment:

All of the planned activities and targeted deliverables of the grant were completed. Vietnam made satisfactory progress towards the development and pre-negotiation of the ERPA, all key technical requirements were finalized, including a revised Environmental and Social Management Framework (ESMF) and other safeguards instruments, ER title transfer documentation, a reversal risk management mechanism, benefit sharing plan and related procedures for the Adaptive Collaborative Management Approach (ACMA). Several components, such as the development of a feedback and grievance redress mechanism (FGRM) and the Safeguards Information System (SIS), were coordinated with the UN-REDD program (which closed in December 2018). The national SIS is used to report on safeguards for the ER-P.

Forest reference level was established for the NC area, and capacity building activities were implemented for monitoring at provincial level. Five Provincial REDD+ Action Plans (PRAPs) in the NC were developed and updated in line with the National REDD+ Action Plan (NRAP). REDD+ steering committees in NC provinces were established and supported. Capacities are in place at the central project management unit (PMU) and PPMUs to implement the project. M&E system was established and operational.

Contributions were provided to the development of regulatory documents (Decrees and Circulars) which are required to implement the Forestry Law (approved by National Assembly in November 2017). In the North Central provinces, there was

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continued communication, coordination workshops, capacity building and stakeholder consultation activities for the finalization of the Benefit Sharing Plan (BSP). The project also improved coordination with different projects in ER-P program area. FCPF supported the Government of Vietnam with negotiations on the FLEGT Voluntary Partnership Agreement (VPA) and supported preparation towards full VPA implementation.

Vietnam presented its self-assessment of progress towards REDD+ Readiness, its Readiness-Package, to the FCPF Participants Committee in September 2016.

Grant follow-up and structure

Description and context of Grant:

A Readiness Preparation Grant Agreement was signed January 22, 2013, for an amount of US\$3.8 million (closed November 2016). A second grant of US\$5 million was approved November 18, 2016.

The additional grant was provided to continue preparations for REDD+ Readiness, including analytical studies and development of capacities for the effective and efficient REDD+ implementation at national and provincial levels, policies and technical support on SFC and FMB reform for REDD+ service provision, private sector engagement and support for Forest Law Enforcement, Governance and Trade (FLEGT) implementation, development of strategic environmental and social assessment national and sub-national REDD+ strategy option, stakeholder consultation and participation.

Expected follow up (if any): Follow up Bank project or grant (non-Bank funded)

Comment on follow up:

While the first grant (US\$3.8 million) was successfully implemented, the focus of the second grant (US\$5 million) is to continue to build capacity to effectively implement REDD+ actions at both the national and sub-national level, though with more focus on implementation in the provinces. These priorities are especially important with respect to the implementation of an operationally sound ER Program in the provinces in the North Central Region, as an entry point for investments in the landscape.

The project is in line with the World Bank's sector-wide approach on forests and land use, COVID-19 recovery priorities, and corporate commitments on forests and climate change. The project represents an integral part of a programmatic engagement on forests in Vietnam and complements other Bank operations, including the DPOs series on climate change and green growth and the Forest Sector Modernization and Coastal Resilience Enhancement Project, as well as development partner finance.

The last follow up visit took stock of recent progress and set the roadmap for ERPA signature and effectiveness.

End Date of Last Site Visit:

Restructuring of Grant:

A 6-month extension to June 30, 2020 was granted to the original closing date (December 31, 2019).

OUTCOME

Comments on outcome achieved from 11/18/2016 to 06/30/2020

Vietnam's REDD+ readiness capacity was enhanced, especially in the NC region which is ready to implement the ER Program. Overall, REDD+ readiness preparation - in terms of capacity building, communication, MRV, safeguards, and legal frameworks - was improved. Vietnam effectively met the technical, policy and financial aspects required for sub-national REDD+ implementation, prepared the requisite legal requirements (e.g., Letter of Approval, BSP, provisions to demonstrate MARD's ability to transfer title to ER) and successfully negotiated an ERPA, demonstrating enhanced capacity to effectively implement REDD+.

Grant Outcome Indicators

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No Outcome indicators are defined or used for this grant.

COMPONENTS

Output and Implementation by Component

Analytical studies and development of capacities for the effective and efficient REDD+ implementation at national and provincial levels

Status: Completed

Planned Output: studies and analytical assessment informing strategy and policies; improved capacity at all levels

Actual Output: studies and analytical assessment informing strategy and policies; improved capacity at all levels

Policies and technical support on SFC reform for REDD+ service provision; private sector engagement and support for FLEGT

Status: Completed

Planned Output: policies and strategies, private sector engagement in REDD service

Actual Output: policies and strategies, private sector engagement in REDD service

Development of the Strategic Environmental and Social Assessment (SESA); national and sub-national REDD+ strategy options; stakeholders

Status: Completed

Planned Output: SESA and safeguards framework and instruments

Actual Output: SESA and safeguards framework and instruments

Project management and monitoring and evaluation

Status: Completed

Planned Output: The project is adequately managed, monitored and evaluated

Actual Output: The project is adequately managed, monitored and evaluated

Comment on planned and actual Output

Activities were completed with good overall progress.

Comment on component implementation progress

Component 1: Analytical studies and capacities are developed for effective and efficient REDD+ implementation at national and provincial levels, through the following outputs:

- Capacity building activities: 10 training courses on high-yield and large-timber forest plantation, transforming the short-term rotation plantation forests to long-term rotation plantation forests, restoration of natural forests, and promotion of natural regeneration for natural forests were held for SFCs and FMBs, forest owners, forest smallholders, and technical staff in Ha Tinh Province. Capacity of forest monitoring for nearly 210 staff from the Provincial Forest Protection Departments (PFPDs), FMBs, and district and commune-based forest rangers continues to be improved in 2019 through one training of trainers course and 16 extension training courses on using tablet PCs in monitoring forest and forestland changes in the six NC provinces. The forest monitoring devices (350 tablet PCs, 49 GPS, 50 laser distance measures, 50 tree height measuring instruments) were handed-over to the six NC provinces.
- REDD+ steering committees in NC provinces are established and supported. Then, they were integrated into the provincial steering committees of the Target Program on Sustainable Forest Development.

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- Support was provided to provinces to facilitate implementation, including operation costs, reviewing and approving the provincial proposals in time, equipping the provincial project management unit (PPMU) offices with necessary equipment (computers, photocopiers, printers, cameras, etc.).
- Support to national REDD+ entities, including contribution to safeguards sub-technical working group on development of SIS and Summary of Information (SOI), the ability to transfer title of ERs to the Carbon Fund, the REDD+ registry system and data management system, the reversal management mechanism, the FGRM, development of the approved ER Program Document (ER-PD) in line with Vietnamese format and procedures, etc.
- Forest reference level was established for the NC area (see final ER-PD version), and capacity building activities were implemented for monitoring at provincial level such as 6 training of trainers courses and 13 replication training courses on measurement and reporting of forest changes for nearly 400 staff from the PFPDs, FMBs, and district and commune-based forest rangers in the NC provinces.
- Methodology and terms of references to ensure Vietnam's ability to transfer ER titles have been formulated, and experts recruited to provide technical support.
- Many consultations related to REDD+ Readiness preparations (BSP and related ACMA manual, FGRM, safeguards, the Forestry Law, etc) were organized with around 8,500 participants from all stakeholders such as governmental agencies from central to community levels, non-governmental organizations (NGOs), civil society organizations (CSOs), forest owners, local people, etc. The female participants accounted for around 21%, while the ethnic minority people accounted for nearly 30%.
- More than 3,400 people, of which more than 40% were female participated in communication events and public outreach on REDD+, forest protection, and forest-related aspects of climate change.
- Five Provincial REDD+ Action Plans (PRAPs) in the NC were developed and updated in line with the National REDD+ Action Plan (NRAP). The drafts of PRAP monitoring and evaluation (M&E) framework were discussed with the NC provinces and Quang Tri piloted the M&E.
- Vietnam completed the necessary documents related to ERPA such as the Letter of Approval, the Advanced Draft BSP, the Reversal Management Mechanism, Due Diligence Report on Safeguards in the ER-P in the North Central Region of Vietnam, and the Draft Decision of ability to transfer title to ER. Further elements of the ER-Program were also finalized, with active consultations, such as ER registry, ACMA manual, the upgraded SIS, the Project Operation Manual (POM), documentation framework of monitoring and evaluation in the project on reducing emissions and transferring ER title in the North Central region, the FGRM, MRV System. This has built on active consultations at the national, regional, provincial and local level. In addition, the Ministry of Agriculture and Rural Development (MARD) established a Negotiation Team for the ERPA and completed negotiations with the World Bank on the General Conditions and commercial terms, under the ERPA roadmap that were signed on 22nd October 2020.

Component 2: Vietnam progresses its SFC/FMB reforms to improve REDD+ service provision, engagement of private sector, and FLEGT implementation

- Under the new Forestry Law 2017, the Project supported MARD in the development of two Decrees and one Circular. Decree No. 156/2018/ND-CP provides the detailed instructions for implementation of some articles in the Forestry Law. Decree No. 01/2019/ND-CP is on policy, mechanism, and operation of the forest protection force. The development of the Circular No. 29/2019/TT-BNN regulates silvicultural technics for restoration, enrichment of natural forest and plantations. They include specific provisions on extension of mechanisms to provide forest services, promote REDD+ implementation, enhances the role of the private sector in sustainable forest development and reform SFC and FMBs functions.
- Training and technical assistance was provided to support planning and certification of SFC and FMB, for instance a protection forest management board in Thanh Hoa Province was supported to implement the sustainable forest management and got the forest certification, 3 training courses on the sustainable forest management and forest certification were held for potential forest owners in the NCR; and SFC in Ha Tinh supported to maintain its forest certificate.
- FCPF supported the Government of Vietnam with negotiations on the FLEGT Voluntary Partnership Agreement (VPA), which successfully concluded in May 2017. The project also supported preparation towards full VPA implementation. For example, two regional consultation workshops on the Organizations Classification System (OSC) in the FLEGT. Moreover, the NC provinces evaluated the status of implementation of the forestry law and policies and legal timber through consultations with local stakeholders (authorities, forest owners, forest protection departments, traders, processing companies, communities and people).
- Four training courses, one workshop, three study tours with nearly 600 participants on sustainable forest management and applying for the forest certification were implemented in the NC provinces. Moreover, Ha Tinh Huong Son Service and Forestry One Member Limited Company in Ha Tinh Province was supported to maintain its FSC forest certification. The project also

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supported Tay Kim Cooperatives Union in Ha Tinh Province to get the FSC forest certification. In addition, a pre-assessment of the FSC forest certification was made for Lang Chanh Protection Forest Management Board in Thanh Hoa Province.

- The project supported an assessment about implementation of the Decree No. 118/2014/CP-ND dated December 17, 2014, on restructuring, development and improvement of agriculture and forestry companies.
- Vietnam and the EU signed their VPA on FLEGT in October 2018. The EU and Vietnam ratified the VPA agreement on the FLEGT and its enforcement was on the 1st of June 2019. This success was partly supported by the project.
- Moreover, the NC provinces evaluated the status of implementation of the forestry law and policies and legal timber through consultations with local stakeholders. 73 consultations with nearly 1,800 people from local authorities, forest owners, forest protection departments, traders, processing companies, local communities and people were conducted.

Component 3: The SESA has been completed and will be updated as needed, and ESMF and other safeguards instruments for implementation of safeguards at central and provincial level have been completed

- Strategic Environmental and Social Assessment (SESA) was completed, including many capacity building and consultations at both national and provincial levels in the ER-P area.
- ESMF was improved and received final comments from WB regional safeguards specialists. Two consultation workshops on social and environmental safeguards and two consultation workshops on the ESMF in the NCR were organized. In addition, 25 consultation meetings at district and commune levels with main participation of women and ethnic minorities people were organized in the NC provinces.
- The project collaborated with UN-REDD to finalize the FGRM at national level (completed) and an expert proposed regulations adapted to ER-P operational implementation in NC areas.
- Two consultation workshops on the ESMF of the ER-PD in the North Central Region were organized with participation of 107 members from PPMU members, Forest Protection Management Boards, Special-use Forest Management Boards and Forestry State Companies; two consultation workshops on FGRM were held with participation of 133 members, in which: 25 women and 15 ethnic minority people.
- Safeguard Operation Manual development was completed.
- Due Diligence Report on Safeguards in the ER-P were developed and submitted to the FCPF.
- 46 technical meetings, consultation workshops on SESA, ESMF, FGRM, Resettlement Policy Framework (RPF), Gender Action Plan (GAP), Ethnic Minority Planning Framework (EPF) were organized with the participation of 2,190 people, in which: 600 women and 1,261 ethnic minority people.
- A number of communication events were conducted in six provinces on Forestry Law, ER-PD in NCR with participation of 5,397 people, in which 2,519 women and 2,315 ethnic minority people.
- Communication materials were developed and distributed widely at central and provincial level.

Component 4: The project was adequately managed, monitored and evaluated

- Capacities were in place at the central project management unit (PMU) and PPMUs to implement the project. Workshops and training courses were conducted for Government agencies, the PMU and the six PPMUs on project management, finance, monitoring.
- M&E system was established and operational, and supported timely activities and financial reporting. The regular evaluation reports were completed and sent to the MARD and the World Bank on time.
- Annual audits and performance evaluations were implemented as planned.
- Overall workplan, annual workplans and procurement plans were developed.
- The project document was amended and approved by MARD.
- PRAP M&E indicators and REDD+ implementation M&E indicators were collected in the six provinces of the North Central Region.

EXECUTION

Bank project related to the grant

Project ID / Name:	P124584 - Vietnam - FCPF REDD Readiness
Project Status:	Lending
Global Focal Area:	Climate change
Product Line:	RE - Recipient Executed

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Implementing agency and contact details

Agency: Ministry of Agriculture and Rural Development
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PROGRAM

Program Specific Questions

1. Describe progress in how the Grant activities are being coordinated with other REDD+-related initiatives, including those funded by Describe progress in how the Grant activities are being coordinated with other REDD+-related initiatives, including those f

Vietnam is progressing well towards full REDD+ implementation. The FCPF phase 2 project funded with Additional Funding is well connected to other initiatives led by VNFORST including the UN-REDD Program, JICA and GIZ bilateral assistance as well as other investment projects from the World Bank. The project benefits from overall progress at central level and actively coordinates on topics like safeguards, MRV, benefit sharing, REDD+ policies and measures, capacity building using well-established national coordination platforms. The FCPF grant has supported the preparation of the Emission Reduction Program in the North-Central region and the negotiations of an ERPA. The program in the North-Central region offers an excellent opportunity for the National REDD+ Program to be implemented at the sub-national level and provides added value to other REDD+ initiatives in country.

2. Describe any important changes in the technical design or approach related to the Grant activities.

No significant changes.

3. Describe progress in addressing key capacity issues (implementation, technical, financial management, procurement) related to this Grant.

Good progress was made to enhance the project's capacities through the recruitment of key experts and capacity building activities, in particular at the sub-national level in the provinces that will implement the ER Program.

4. Describe progress in addressing social and environmental issues (including safeguards) related to the Grant. Is the SESA conducted in accordance with the Common Approach?

SESA was finalized in accordance with the Common Approach. Further consultations have been carried out and comments received on the ESMF and other safeguards instruments, including from the WB, and were incorporated in a revised version. In parallel, progress on FGRM and benefit sharing have also been delivered, so completing the strengthening of the overall safeguards mechanism.

5. Is the ESMF prepared in accordance with the Common Approach?

Yes

6. Describe progress in stakeholder consultation, participation, disclosure of information, and the FGRM related to this Grant.

The grant supported comprehensive consultations and capacity building to ensure effective participation of multiple stakeholders, including local authorities, communities, CSO and NGO, and the private sector. On FGRM, the national framework was completed in December 2017, and capacity building and consultations continued at the level of the North-Central Region. Key documents including the safeguards instrument and advanced draft BSP were appropriately disclosed.

COMPLETION

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Overall Assessments and Lessons Learned

Main lessons learned:

- REDD+, especially the transfer of emission reductions internationally is relatively new in Vietnam, and is not regulated by the national law. Therefore, roles of the Government, relevant Ministries, particularly MARD and the participating provincial authorities was important. Their leadership and support was essential to enable the project to move forward and achieve the expected objectives.
- Strong support and close coordination from the Provincial People's Committees, the Provincial Departments of Agriculture and Rural Development was critical to the successful implementation of the project.
- A variety of expertise was needed to implement the project, which was not always available in country. The project overcame this constraint by promoting regular discussions between national and international agencies and experts, frequent communication with donors and the sharing of lessons learned.
- As a result-based payment program, the budget to implement the program comes from different existing and potential projects/programs that contribute to the REDD+ objectives in the North Central Region. The government has not yet approved a program document like this before, and to adopt the EPRD or sign the ERPA, the government applied an exceptional and special mechanism. Some topics require endorsement at the highest levels (for instance on ER title transfer) and convey strong and innovative technical significance. Navigating this integration of both technical and political dimensions to deliver on final ERPA formulation, signature and implementation proved challenging.
- At the moment, Vietnam REDD+ institutions are strengthened with adequate instruments to manage REDD+ implementation, but financial and capacity gaps remain to enter the full implementation phase. In the short-term, additional international public finance is expected to flow in like the ER-P in North Central Region. There's been progress on engaging the private and financial sector as well, and innovative approaches like the deforestation-free jurisdiction initiative are increasing the prospect for more resources in the future. However, a gap in timing remains where the Government of Vietnam has limited resources to invest to bridge the gap.
- REDD+ international instruments are still in a consolidation mode in many ways, which can create confusion to guide national actions. For instance, the FCPF Carbon Fund's new guidance on safeguards, MRV, ER Monitoring Report, suggest that it takes more time and energy for Vietnam to keep up to date with all requirements. In addition, REDD+ has been designed as a "step-wise" approach, with many instruments expected to be upgraded progressively. Vietnam has completed the Warsaw package, though continuous effort and investment is needed to keep improving REDD+ instruments like the forest reference emission level/forest reference level, the national forest monitoring system, the SIS. Echoing the first challenge with the financial gap above, this continuous need to invest in REDD+ architecture can be seen as a burden.
- The REDD+ planning has generated a wealth of innovation and transformational directions that are extremely relevant but very challenging to implement, facing many institutional, psychological, cultural and economic barriers. Removing them takes time and energy, and requires significant improvement to the power balance in favor of sustainable forest development, which remains a costly endeavor in Vietnam.
- REDD+ has made active progress and produced significant lessons learned in many ways (technical, institutional, political), but the collection and management of knowledge should be further strengthened, and a better sharing of experiences and lessons between programs should be further encouraged for more impacts (as illustrated by the dialogue between various partners including WB, USAid, UNDP, UNEP on Carbon-Payment for Forest Ecosystem Services (PFES)).
- Legal and administrative procedures of Vietnam has been influencing the progress towards ERPA signature. It also takes time for the Vietnamese Government Office and relevant ministries to review and finalize the ERPA and the enclosed conditions of effectiveness.

Overall outcome (and its Sustainability):

Comment:

The REDD+ Readiness support allowed for the establishment of the main REDD+ institutions and systems needed to move to the next phases including investments and the preparations for the potential results based payments, in particular the ER-P: safeguard instruments, FGRM, MRV system, FREL, BSP, etc.

The grant financed activities largely achieved their objectives. The REDD+ dialog enhanced attention to the drivers of deforestation and forest degradation and increased cooperation between the forestry sector and other sectors that are at the root of deforestation and forest degradation. Investments for REDD+ are committed and an ERPA signed for FRs.

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Bank Performance:

Comment:

The overall Bank Performance is Satisfactory, based on quality at entry, project supervision and additional resource mobilization. Regular supervision missions were organized and documented (Aide-Memoire), Non-Objections were provided to the client under reasonable timeframes, and regular reporting was done to the Bank and donors. The Bank team provided close support and technical advise throughout implementation of the grant financed activities.

Additional Assessment

Development / strengthening of institutions:

Comment:

The capacity of MARD to handle REDD+ has increased immensely thanks to the grant support. The National REDD+ management institutions are well versed on REDD+ and have a better capacity for managing the national REDD+ process.

Mobilization of other resources:

Comment:

Vietnam was the first country in the Asia Pacific region that was able to access REDD+ financing for all three phases: (1) readiness preparation being implemented through the FCPF Readiness Fund (providing financing for the Formulation and Preparation stages) and also with support from other partners, such as UN-REDD; (2) investments from long-standing Government programs and include several donor-financed projects; and (3) ERPA for results based payments from the FCPF Carbon Fund, signed October 2020.

Knowledge exchange:

Comment:

The Vietnam REDD+ team has been a part of various learning events on REDD+ supported by the FCPF and other sources.

Client's policy / program implementation:

Comment:

Vietnam is on track to achieve tangible REDD+ results and subsequent results-based payments.

Efficiency:

Comment:

Outcomes planned at the onset have been largely achieved, in a timely manner, thus efficiency is rated satisfactory.

Replicability:

Comment:

The ER Program in the North Central Region will hopefully provide a strong and scalable foundation for REDD+ implementation in additional provinces or nationally, enabling Vietnam to mobilize further support for its sustainable forestry sector.

Main recommendations to stakeholders:

REDD+ has been communicated globally as a mechanism which seeks to incentivize activities targeted at reducing emissions from the land-use sector. This line of communication has created high expectations amongst some sections of stakeholder groups of large financial inflow for REDD+. In order to ensure the effective management of expectations, deliberate efforts need to be made to emphasize the various co-benefits which will arise from REDD+ implementation, and that any payments for implementation of REDD+ will be performance-based and will consequently require continual support and commitment from all stakeholders.

Main recommendations to Bank Management:

Readiness preparations, as well as the results based payments under the ERPA, are highly technical processes which require substantial time, resources and skill sets on the client side, as well as strong support from the World Bank's teams.

DISBURSEMENTS

Disbursements Summary in USD

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Date From	Date To	Planned Cumulative	Planned Period	Actual Cumulative	Actual Period
07/01/2016	12/31/2016	0.00	0.00	0.00	0.00
01/01/2017	06/30/2017	0.00	0.00	1,000,000.00	1,000,000.00
07/01/2017	12/31/2017	0.00	0.00	1,000,000.00	0.00
01/01/2018	06/30/2018	0.00	0.00	1,428,380.95	428,380.95
07/01/2018	12/31/2018	0.00	0.00	2,336,063.71	907,682.76
01/01/2019	06/30/2019	0.00	0.00	3,201,697.56	865,633.85
07/01/2019	12/31/2019	0.00	0.00	4,565,029.43	1,363,331.87
01/01/2020	06/30/2020	0.00	0.00	4,894,264.65	329,235.22
07/01/2020	10/31/2020	0.00	0.00	4,522,060.55	-372,204.10