

Executive Summary

1. This report presents the findings of the Terminal Evaluation of three of the UN Environment's interventions in Africa: "Capacity Strengthening and Technical Assistance for the Implementation of Stockholm Convention National Implementation Plans (NIPs) in African Least Developed Countries (LCDs) of the COMESA, SADC and ECOWAS Sub-regions" developed under the Stockholm Convention and funded by the Global Environment Facility (GEFIDs 3968; 3942; 3969). It assesses the design, implementation and results of these projects from August 2011 to December 2017.
2. As the three projects were originally conceived as a programme and they share the same overall structure (main outputs, components and objective), the Terminal Evaluation was undertaken jointly. A single Theory of Changes was developed and tested during the evaluation. The three direct outcomes are: 1) National legislative and regulatory frameworks adopted; 2) Enforcement capacities built and mainstreamed; and 3) Public and vulnerable communities changed their behaviour to avoid exposure to POPs. Outcomes 1 and 2 lead to the achievement of the objective "Enforcement of Stockholm Convention provisions undertaken in a sustainable, effective and comprehensive manner". This, together with outcome 3, lead to the achievement of project impact "Risks from POPs to public health and the Environment in COMESA, ECOWAS and SADC LDCs are reduced".
3. The projects were designed to be implemented in parallel with similar interventions by UNIDO with a common Project Coordinating Body. This approach was abandoned in 2015 when it became clear that there was limited opportunity for collaboration and coordination between the UNIDO and UN Environment projects.
4. The COMESA and SADC projects were executed by WWF Regional Office for Africa in Nairobi. The ECOWAS project was co-executed by the Basel and Stockholm Conventions Regional Centre in Dakar and Green Cross Switzerland.
5. The overall objective of the Terminal Evaluation is to assess in a systematic and objective manner the performance of the projects from August 2011 to December 2017 against the Theory of Change using the UN Environment Evaluation Office's standard evaluation criteria. It also assesses whether the projects have achieved or are likely to achieve their project objective of "strengthening and building capacities required in LDCs and SIDS in the sub-regions to implement their Stockholm Convention NIPs in a sustainable, effective and comprehensive manner, while building upon and contributing to strengthening a country's foundational capacities for the sound management of chemicals". As well, the extent of the likelihood whether the project will contribute to reducing the effects of POPs on human health and the environment is assessed. The evaluation does not seek to assess the performance of any country or national institution as a stand-alone entity. The Evaluation aims to assist the governments, donors, counterparts, UN Environment and other stakeholders to learn from the Projects' performances.

6. In the final quarter of 2017, the Evaluation Team visited 11 of the 26 countries that were involved in the three projects (Burundi and Uganda in COMESA; Guinea, Liberia, Mauritania, Niger, Senegal, Sierra Leone and Sao Tome and Principe in ECOWAS; Lesotho and Mozambique in SADC) and interviewed 166 national stakeholders. In addition, face-to-face and remote interviews were undertaken with past and present staff of the Executing Agencies and UN Environment, who were involved with the project. To extend the reach of the evaluation to all countries, 298 national stakeholders and 30 regional stakeholders were invited to complete an on-line survey. Data from all these sources was triangulated with project documentation and served to establish the evaluation ratings.

Evaluation findings

7. The overall evaluation rating of each of the three projects is **Moderately Satisfactory**. The ratings for the evaluation criteria of each project are detailed in the respective tables, below:
8. The strategic relevance of the project was found to be highly satisfactory; it is aligned with the mandate, MTS and thematic priorities of UN Environment; with regional, sub-regional and national environmental priorities; with target group and beneficiaries' needs and priorities; with GEF Strategic priorities and is complementary to numerous existing interventions. In addition, it also shows alignment with UN Environment capacity building and South-South cooperation policies.
9. The projects were designed to respond to concerns regarding lack of capacities to implement NIPs in the region and sought to build on previous efforts and structures put in place during NIP development. They were designed to cover the gaps identified further in a series of stakeholder/needs assessments, which were well attended by countries in the region. The project documents laid out goals and objectives in a manner consistent with their respective priorities and were developed using the appropriate standards of the time. In general, the narrative synthesis is consistent and fact based; the products are necessary to achieve the expected results. However, the Terminal Evaluation identified strengths and weaknesses; overall the quality of project design was rated as Moderately Satisfactory for the three projects.
10. As regards the nature of the external context, although very different external and country specific conditions occurred during the period of implementation of these projects in the sub-regions, in general this criteria is not considered to have had a significant negative effect on delivery of the expected Outputs. Overall this was rated as Favourable in the SADC sub-region, and Moderately Favourable in the COMESA and ECOWAS sub-regions.
11. Effectiveness of the projects' three components was assessed based on the delivery of the restructured outputs, on achievement of the direct outcomes, and likelihood of impact. The Evaluation Team was able to document significant qualitative and

quantitative results for all Direct Outcomes. It is however important to note that this review took into consideration the fact that, at time of writing of this Terminal Evaluation, a number of the outputs have yet to be completed. It is however important to note that this review took into consideration the fact that, at time of writing of this Terminal Evaluation, further no cost extensions were being prepared as a number of the outputs had yet to be completed.

12. A model law was developed and was considered as useful by the countries who used it as a good starting point, or as guidance to develop their own texts. However, the fact that this was based on the Common Law system created a challenge for countries operating under the Napoleonic Code, for example. In addition, the model law did not include suggestions of mechanisms for raising funds in support of sustainable enforcement activities.
13. The targets for drafting national chemical legislation, set at the time of the projects' approval, were met or surpassed in the three sub-regions; however one output specific to each of the COMESA and SADC sub-regions has not been met, respectively drafting of pesticides regulations in Uganda, and development of model sector-specific regulations for incinerator operation, contaminated sites and bio-pesticides. While the first is likely to be completed in the future through on-going government support, the latter will not be delivered by project closure.
14. In all three projects the regional trainings of trainers of environmental officers on enforcement of the Stockholm Convention were carried out successfully in the early stages of the project. Subsequent national trainings were organised in 2016 and 2017 surpassing overall expected targets in terms of number of staff trained in each project. Evidence from the survey and interviews indicates that, in all three projects, the training increased the proportion of staff that were now aware of the Stockholm Convention, but that the depth of their knowledge and their capacity for enforcement of chemical legislation remained weak. In particular, the evaluation noted that if the legislation had been available before the capacity building exercises were undertaken, the resulting capacity for the enforcement of actual national legislation would have been stronger. As it is, much of the capacity building was more generic for the Stockholm Convention enforcement.
15. An additional output specific to COMESA and ECOWAS was agreed to by the final regional Steering Committee meeting and will lead to four students being offered bursaries to undertake the University of Cape Town's Diploma in Pesticides Management. For ECOWAS, training on obsolete pesticides was conducted, with the support of FAO. Training on inventories also took place, but results are yet to be demonstrated. As well, an output was added to help utilise unspent funds to support the inventories of polychlorinated biphenyl (PCB) wastes under the parallel ECOWAS PCB project.
16. As regards the establishment of knowledge management systems, regional trainings were undertaken, however no evidence was found for any country having established a functioning website with links to the Chemicals Information Exchange Network

(CIEN). As UN Environment determined that the CIEN platform could no longer be supported, it is no longer available on-line. This said, high-level support for the establishment of a CIEN was documented during the evaluation and in particular was mentioned in the closing statements delivered by the African Group at the BRS COP in Geneva in 2017. However, it was evident that, without dedicated and committed staff and financial resources, it is unlikely that a chemicals information network will be sustainable.

17. As regards the third and last component, experiences and good practices were disseminated and shared. The SADC Project originally aimed to train national environmental staff to develop communications strategies. This was reformulated by the Steering Committee (June 2017) to train NGOs in both COMESA and SADC participating countries in the development of communication and advocacy strategies for POPs. At the time of preparation of the evaluation, these activities had not yet been initiated; a regional training is expected to take place in March 2018 and information on this will have to be reflected in the final project reports.
18. POPs general awareness-raising campaigns were undertaken for vulnerable communities in the three projects and the activity is considered to be largely complete. The campaigns focused on men and women small scale-farmers who use or are exposed to pesticides, and aimed to raise their awareness of: 1) the risks of POPs and pesticides; and 2) to ways to mitigate those risks with safer pest control and correct application methods, including the use of personal protective equipment. Results to date show that they were completed in 3 of the countries of the COMESA sub-region; completed in the 4 targeted pilots in ECOWAS; and were 85% completed in SADC. In addition, these activities were also carried out in schools in the four pilot countries in ECOWAS. Overall, the effectiveness of Delivery of Outputs for each of COMESA, ECOWAS and SADC projects is rated Moderately Satisfactory
19. Gender data has currently not been compiled for the project activities. At the time of project formulation, inclusion of gender consideration was not a requirement under the GEF. Gender is not an important factor in components 1 and 2. Evidence indicates that in component 3, women farmers were targeted in the behaviour change initiatives.
20. As regards achievement of outcomes, for the adoption of national legislative and regulatory frameworks, evidence indicates that significant progress has been made towards its achievement. In addition, the moderately satisfactory delivery of outputs at the time of the Terminal Evaluation combined with interview and survey data confirms that it is highly likely that adoption of national legislative and regulatory frameworks will be achieved in most project countries within the next two years, with the remainder in two to five years' time.
21. For the building and mainstreaming of capacities, evidence demonstrates that significant progress has been made towards the achievement of this outcome in all projects. Progress towards mainstreaming enforcement-training capacity was evidenced during the field missions, particularly with the national Judiciary and

Customs training institutions where they exist. Although the number of national and provincial environmental inspection staff with general awareness of the Stockholm Convention and sound chemicals management has increased as a result of all three projects, there remains a significant lack of capacity for its enforcement.

22. Finally, as regards changing the behaviour of the public and vulnerable communities, the Evaluation notes that there was increased awareness of the risks associated with POPs and pesticides as a result of the three projects and in conjunction with similar interventions. For example, there was evidence from the interviewed representatives of small-scale farming communities of their desire to mitigate risks from exposure to pesticides. However, the brevity of the trainings, lack of confidence in demonstrated alternatives (such as organic agriculture and integrated pest management) and lack of available and affordable personal protective equipment has, for the moment, impeded the foreseen behavioural changes.
23. Overall, the effectiveness of achievement of direct Outcomes for each of COMESA, ECOWAS and SADC projects is rated Moderately Satisfactory.
24. Summing up the findings as regards the likelihood of impact, the evaluation indicates that not all the direct outcomes were fully achieved, however partial progress has delivered some results, and indications are that some will be achieved or are likely to be achieved. As regards progress towards intermediary changes, the measures designed to move towards the sustainable, effective and comprehensive enforcement of the Stockholm Convention, provisions have started, and have produced some results. Evidence also demonstrates that there is a willingness to continue in this direction in all participating countries, however, this is affected by national realities and capacities, including availability of finance.
25. The project has at this stage not achieved "documented changes" in reducing risks from POPs to human health. However, interview data does show that as a result of the awareness raising and training interventions of the project, progress in this direction has been made and it is considered likely that progress towards these will be achieved. Overall this results in a Moderately Likely rating for impact, and overall, the projects are assessed as having Moderately Satisfactory Effectiveness.
26. As regards financial management, the Evaluation Team was not made aware of any deficiencies as regards the completeness of financial information. However, although the annual Project Implementation Reviews include some information about in-kind and cash co-finance, there is evidence that the information is outdated and incomplete and has proved challenging to obtain. This is a deficiency that Executing Agencies are aware of and it is understood that they will have to provide complete and up to date information on co-finance at project closure. This criterion is rated as moderately unsatisfactory. Communication between finance and project management staff was rated, based on available information and interview data as being satisfactory, and overall, the rating for financial management for the three projects is rated Satisfactory.

27. As regards efficiency, the Evaluation Team was not made aware of any concerns regarding cost effectiveness or costliness, and considers, that although to date the project has not delivered all of the expected results, those achieved have been delivered at a reasonable cost. Even though the project is presently facing severe delays in its implementation and did not produce results within the initial time frame available (i.e. by August 2016), the Evaluation Team considers that there are mitigating factors that partially account for this; these include a series of unforeseeable events, which effectively derailed project implementation and have contributed to a one and a half-year delay, and to relatively low operational efficiency. In light of these delays the projects were granted two no-cost extensions and are, at the time of drafting this report, struggling to complete expenditure of resources within the extended project timeframe. As regards delays, interview data was unequivocal in noting the dissatisfaction with the executing capacities of both Green Cross Switzerland and World Wide Fund for Nature – Regional Office for Africa (formerly Eastern and Southern Africa Regional Office) primarily because of the slow response times, overly-complex administrative and reporting processes, and lack of thematic expertise, to name a few.
28. As all three projects had two no-cost extensions, the delays in implementation had negative impacts on government stakeholders, and the project activities were occasionally sequenced inefficiently, the project is rated as unsatisfactory.
29. The M&E for all these three projects was designed according to both the GEF and UN Environment's standard procedures for monitoring and evaluation in place at the time of project design (2009-2010). The logframe included "objectively verifiable indicators of achievements, sources and means of verification for the project outcomes and outputs, and the timeframe for monitoring activities" were specified in the projects' Monitoring and Evaluation Plans.
30. Following the appointment of the current Task Manager in 2015 and in order to address the significant delays the Projects had experienced, additional measures were put in place to improve the supervision and support provided by UN Environment to the Executing Agencies. These improvements included monthly teleconferences and quarterly forecasted work plans and budgets. These enhanced M&E systems have helped to bring the Projects back on track. These Projects have been a major driver in the development of more systematic supervision systems.
31. Monitoring systems were put in place at the level of both Executing Agencies, in line with their own standards and evidence suggests that these allowed the persons responsible for monitoring progress against indicators to track results and progress toward project objectives.
32. Monitoring of project progress is considered to have been adequate, given most indicators were at output level and easily tracked, however monitoring of performance (in terms of achievement of project outcomes and the overall project objective) was unavailable given inadequacy of indicators.

33. As part of the monitoring mechanisms, Project Steering Committees were established. For the COMESA and SADC projects the joint Steering Committee has met 9 times, while that for ECOWAS has met 7 times. The Steering Committees were effective at reviewing project performance and making decisions for future work plans and used in particular the Steering Committee Meetings to address issues and implement solutions, as required.
34. Overall Monitoring and reporting are rated Moderately Satisfactory.
35. Sustainability was rated at the national level for each of the countries in each of the projects and averaged to produce a single sustainability rating for the project. While there were some differences between the ratings of countries within the same project, the average rating for each of the three projects was similar. Socio-political sustainability is rated as moderately likely; financial sustainability, which depends on the commitment of the countries to provide the necessary long-term resources both financial and human, is considered moderately unlikely; and, institutional sustainability, which is considered moderately likely. Overall sustainability for the projects was rated as Moderately Unlikely.

Main conclusions and recommendations¹

Conclusion 1	Targeting Interventions to Maximize Results
	Recommendation 1:
<p>"One size fits all" regional approach is not appreciated by participating countries; the one on one approach was considered preferable</p> <p>High expectations in countries were not met</p> <p>UN Environment was described as being "mostly absent" and only seen as a distant partner appearing during Steering Committee meetings</p>	<p>UN Environment should carefully assess the benefits of regional interventions and consider whether theoretical benefits (cost effectiveness, ease of GEF approval and implementation, timeliness) outweigh the risks (complexities and inherent delays, dilution, etc.)</p>
Contributing Conclusions	Supportive recommendations:
<p>Countries at different levels of development, and with different capacities, progress at different speeds</p> <p>Different languages in one regional project entail additional challenges for Executing Agencies and adds a layer of</p>	<p>To improve results, effectiveness and sustainability of interventions, preference should be given to country specific interventions, or limited scale regional projects; In those cases, efforts should be made to reduce the number of targeted countries to a minimum, grouping those that are developmentally similar and linguistically</p>

¹ Although at this time, there are no direct follow-on projects, the conclusions and recommendations are relevant to the design and implementation of future UN Environment projects

complexity to executing/coordinating activities, meetings and trainings	identical However the benefits of cross fertilization (South-South Cooperation) in cases where small scale targeted regional interventions are favoured should be facilitated and supported
Countries are different in area, population, language, and require different budget allocations	Budgets should take into account the territorial extension of the target country as well as the cost of living, to ensure that country-wide results can be achieved and sustained
Pilot countries were perceived to have gained a comparative advantage, in particular as not all benefitted from the experience	Activities piloted in one country should be effectively implemented in others. Budgetary and time requirements should be factored into the project design
Conclusion 2	Strengthening Implementation Capacities
	Recommendation 2:
Low capacity (in some countries) and complex administrative processes resulted in delays and frustration	Strong actions in support of establishing and/or strengthening implementation capacities at the national level should be included in future projects Streamlining and mainstreaming of national capacities should be strongly encouraged and supported
Contributing Conclusions	Supportive recommendations:
Focal points in some LDCs lack basic infrastructure and/or staff for effective project coordination and execution. Focal points often have continuing full time responsibilities for the administration and function of their normal roles. This can impair their ability to coordinate project activities.	Future interventions should consider options to emulate the methodology followed by UN Environment for Montreal Protocol activities (capacity building and financial support provided to National Ozone Units) and seek to replicate its demonstrated positive results UN environment should encourage countries to nominate project Focal Points on the basis of their ability to influence the achievement of project outcomes and to exploit synergies with other projects. Projects should include an induction for National Focal Points and staff in charge of project implementation and administration to include standard narrative and financial reporting, progress monitoring, proposal writing for agreements with Executing bodies Agreements should be established with the national implementing institutions that firmly anchor the project in the institution and ensure that the focal point is adequately

	resourced in terms of time and personnel to undertake project activities.
<p>Countries would welcome having access to information on laboratories capable of analysing POPs and pesticides</p> <p>Countries are still keen to have access to a database on Chemical Information but lack the capacity to populate it</p>	<p>UN Environment should support and facilitate access to on-line resources, including a comprehensive database for chemicals information, and a registry of certified laboratories to promote knowledge sharing and informed decision making processes</p>
<p>There is a need for ongoing training, as well as for more in-depth training</p> <p>Long gaps between Training of Trainers and national trainings hampered execution.</p> <p>The training for "enforcement capacity" was less effective because it was undertaken before the laws had been adopted</p>	<p>Training activities, including training of trainers, should be aimed at reinforcing national systems and capacities. When they exist, training, reference or excellence centres, as well as technical training institutions (schools, universities, etc.) should be, as a matter of priority, selected to receive the trainings and supported to replicate them.</p> <p>Syllabuses of existing institutions should be updated to reflect acquired knowledge in support of mainstreaming</p> <p>In support of effective and long lasting acquisition of knowledge, trainings should be carefully designed to address the needs of targeted audiences: from general awareness raising to in-depth enforcement and more technical training</p> <p>Capacity building activities should be carefully sequenced, following on once the newly developed tools have been approved (e.g. legislation); resulting regional and national training activities should be integrated</p>
Conclusion 3	Delivering Appropriate Tools
	Recommendation 3:

<p>Model Laws are effective tools to strengthen legal and regulatory capacity</p>	<p>When models laws are developed, UN Environment should ensure that appropriate and country sensitive legal frameworks and systems are covered</p> <p>As well, potential sustainable mechanisms (e.g. funding for enforcement) should be laid out, for selection by the countries; these should include methodologies for setting penalties (at levels that discourage infractions), levies, permits, and licenses</p> <p>Any "Model" document should undergo a rigorous peer review process and ultimately be validated by UN Environment before publication</p>
<p>Conclusion 4</p>	<p>Monitoring in Support of Results</p>
<p>Outputs delivered so far are considered satisfactory, however, long-term sustainability is assessed as moderately unlikely</p>	<p>Recommendation 4:</p> <p>UN Environment should strive to ensure that appropriate supervision of both the Executing Agencies and the national executing partners, is in place throughout the period of project implementation to support achievement of results</p>
<p>Contributing Conclusions</p>	<p>Supportive recommendations:</p>
<p>Capacity of Executing Agencies is a key success factor</p>	<p>A formal due diligence process for selecting executing partners should be instituted and rigorously followed to ensure effective project delivery (including their acceptability to country partners)</p>
<p>The absence (or nominal absence) of a supervisor/Task Manager at UN Environment adversely impacted project implementation</p> <p>Staff rotation hindered project implementation and in some cases lack of formal hand-over processes compounded delays</p>	<p>Formal handover procedures should be instituted and enforced well in advance of anticipated staffing changes; Task Manager should be in place, and have access to sufficient resources to allow him to carry out supervisory functions effectively both at HQ and in the field</p>
<p>Pledged co-financing from many institutional partners was not forthcoming; and appears to have been highly overestimated. prior and during project implementation. In addition, there do not appear to have been concerted efforts to secure this co-finance (Executing Agencies and UN</p>	<p>UN Environment should take a more proactive role regarding following-up on pledged co-finance from institutional co-financers; this should include backing up Execution Agencies when required</p> <p>Co-financing should be rigorously tracked and disbursements of funding tranches tied</p>

<p>Environment did not have, or exert, the influence required)</p> <p>Expectations for cash co-financing from national partners were unrealistically high; in best case scenarios, LDCs should be expected to provide only minimal levels of in-kind co-finance</p>	<p>to their availability</p> <p>UN Environment should engage the GEF to try to establish more realistic co-financing ratios for projects involving LDCs – UN Environment should also directly assume responsibility for securing pledged co-finance and its accurate reporting</p>
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The main lessons learned are:

36. It is likely unreasonable to expect LDC countries to provide cash co-finance; when developing projects the capacities of countries and institutions to provide co-finance, in particular, cash co-finance, should be carefully assessed.
37. It is crucial the Executing Agencies are able to establish effective agreements and working relationships with the national institutions and their focal points. Some countries are averse to dealing with NGOs. NGOs may also lack the standing to be able to establish appropriate relationships with high-level focal points in governments and to request information and follow-up co-finance commitments. These matters should be taken into consideration by UN Environment in their due diligence processes for the selection of an Executing Agency.
38. Countries are at low levels of development and cannot provide close support for both project execution and administration. The Executing Agencies need to allocate sufficient of their resources to provide this support and the project budget should reflect this need. This needs to be taken into consideration during the design phase of projects involving LDCs.
39. Without adequate supervision by UN Environment of both the Executing Agencies and the countries, projects face severe risks of failing to deliver timely and effective results. UN Environment should ensure that its management of the GEF fee allows it to provide appropriate support throughout the life of the project.