

# Regional Enforcement Network for Chemicals and Waste (REN) Final Project Report

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Law Division  
UN Environment  
Asia and the Pacific Office



Regional Enforcement Network for Chemicals and Waste



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## List of Acronyms and Abbreviations

ARPEC	Asia Regional Partners' Forum on Combating Environmental Crime
BAN	Basel Action Network
BC	Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and Their Disposal
BCRC	Basel Convention Regional Centre
BRS	Basel, Rotterdam and Stockholm Conventions
CAP	Compliance Assistance Programme of UN Environment
CEN	Customs Enforcement Network under World Customs Organization
DTIE	Division of Technology, Industry and Economics of UN Environment
EIA	Environmental Investigation Agency
GCI	Green Customs Initiative
HCFC	Hydrochlorofluorocarbon
IMPEL	European Network for the Implementation and Enforcement of Environmental Laws
INECE	International Network for Environmental Compliance and Enforcement
MEA	Multilateral Environmental Agreement
MEA-REN	Multilateral Environmental Agreements Regional Enforcement Network
MP	Montreal Protocol on Substances That Deplete Ozone Layer
ODS	Ozone Depleting Substances
PANAP	Pesticide Action Network for Asia and the Pacific
PIC	Prior Informed Consent
POPs	Persistent Organic Pollutants
RC	Rotterdam Convention on the Prior Informed Consent Procedure for Certain Hazardous Chemicals and Pesticides in International Trade
REN	Regional Enforcement Network for Chemicals and Waste
RILO	Regional Intelligence Liaison Office of WCO
ROCB	Regional Office for Capacity Building of WCO
SAICM	Strategic Approach to International Chemicals Management
SC	Stockholm Convention on Persistent Organic Pollutants
SHP	Project "Sky Hole Patching"
Sida	Swedish International Development Agency
UN Environment	United Nations Environment Programme
UNODC	United Nations Office on Drugs and Crime
WCO	World Customs Organization

## 1. Introduction

This report presents the final project report for the Regional Enforcement Network for Chemicals and Waste (REN) project implemented by UN Environment. REN is a project that combatted environmental crime through strengthening the capacity of 25 participating countries in Asia Pacific to control illegal trade in chemicals and waste.<sup>1</sup> The project was financed with approximately USD \$1.57 million by the Swedish International Development Cooperation Agency, together with co-financing from other funding sources and donors. It commenced in December 2011 and formal activities ended in February 2018. Building on the 'Multilateral Environmental Agreements Regional Enforcement Network (MEA-REN)' project implemented between 2007 and 2011, its overall objective was to reduce illegal transboundary movement of chemicals and waste in Asia by improved enforcement cooperation and enhanced capacity-building of frontline enforcement officers at the national and the regional levels through a network.

Within the framework of this objective, the project had five priority areas with designated outputs: 1) Technical assistance for problem-solving; 2) Information and intelligence sharing; 3) Enforcement operations and the Asia Environmental Enforcement Award; 4) Networking and awareness, and 5) Partnership for sustainability. The Project Logical Framework with Key Targets is in **Annex A**. This report reviews the major activities and results of the project under these five output areas, and considers to what extent the overall objective and outputs were achieved. It also outlines an assessment of existing challenges in the region regarding illegal trade in chemicals and waste, and presents conclusions and recommendations for a follow-on project.

The report acknowledges an independent terminal review that was conducted in line with UN Environment policies and procedures, and a funding agreement for the project between the Government of Sweden and UN Environment. The terminal review assesses the project's performance in terms of relevance, effectiveness and efficiency and by determining outcomes and impact, including their sustainability. The review also provides a mechanism to promote operational improvements, learning and knowledge sharing both within and outside the network. The key conclusions and recommendations of the terminal review are reproduced in **Annex B**. UN Environment acknowledges the terminal review and broadly agrees with the key findings, lessons learned and recommendations. A formal management response is under preparation.

## 2. Executive Summary

UN Environment believes the project achieved important results in pursuit of its objective. Key achievements can be summarised as follows:

- a. **Seizures of over 865,000 tons of hazardous chemicals and harmful waste:** Significant seizures of illegally traded wastes and chemicals was achieved through improved intelligence exchange, training of 1476 frontline enforcement officers, and facilitation of five significant joint enforcement operations;

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<sup>1</sup> Participating countries: Afghanistan, Bangladesh, Bhutan, Brunei Darussalam, Cambodia, China, Fiji, India, Indonesia, Iran, DPR Korea, R. Korea, Lao PDR, Maldives, Malaysia, Mongolia, Myanmar, Nepal, Pakistan, Philippines, Singapore, Sri Lanka, Thailand, Timor Leste, and Vietnam

- b. **Establishing national and regional communication pathways to facilitate enforcement:** Relationships have been forged between customs and environmental authorities through appointment of national focal points and organisation of networking events to build trust and engagement;
- c. **Facilitating inter-regional engagement to reduce waste trafficking:** REN has acted as a bridge between exporting and destinations countries, to more effectively and sustainably tackle illegal trafficking of waste, through inclusion of global partners in regional events and completion of joint enforcement operations;
- d. **Creating attitudinal change in enforcement agencies:** Green issues have been further prioritised by customs officers within the region because of increased training and awareness raising activities, the provision of practical enforcement tools and engagement with environmental authorities;
- e. **Integrating enforcement with gender and human rights:** Greater awareness has been cultivated of the links between gender, human rights and environmental issues, through inclusion of anti-corruption and gender issues in training activities and workshops, as well as greater participation of women in the network; and
- f. **Facilitating significant policy changes in some countries to stop waste trafficking:** Although not widespread, there has been a clear step-change in the policy and actions of some countries within the network, particularly China. If appropriately harnessed and replicated this could lead to real and lasting change within the region.

As summarized in the terminal review and below in table 1, of the 21 output level indicators in total, 16 were met and five partially met. Two out of the three project outcomes were fully achieved (outcome two and three below). Areas of notable success included training, development of supporting tools, networking events and joint enforcement operations.

However, whilst REN has built a strong foundation, there were some challenges – particularly around project design and others – that were identified during implementation. In addition, several improvement areas can be identified. If addressed, they could enable REN to move beyond awareness raising and relationship building to operating as a real network of enforcement partners that can achieve long-term, sustainable results. As identified in the terminal review and explained more fully in Annex B, these include: (a) Pinpointing partner capabilities; (b) Reducing barriers to intelligence exchange; (c) Encouraging greater collaboration; (d) Cultivating widespread ownership of enforcement issues; (e) Raising public awareness; and (e) Moving from awareness to action on social issues.

**Table 1: Summary of Results Achieved Against Outcomes and Outputs**

Project Outcome/ Objective	Indicators and Target	Results Achieved
<b>Overall Outcome:</b> reduced illegal transboundary movement of chemicals and waste	<ul style="list-style-type: none"> <li>• Number of seizures of ODS and hazardous waste reported by countries</li> </ul> <b>Target:</b> 500 seizures	<b>Total:</b> 579 seizures (target met)

in Asia by improved enforcement cooperation and enhanced capacity building of frontline enforcement officers through a network	<ul style="list-style-type: none"> <li>Percentage of participating countries in enforcement operations <b>Target:</b> 50% of REN participating countries</li> <li>Improved ability of the frontline customs officers and representatives of the broader enforcement personnel <b>Target:</b> 1000 enforcement officers trained/involved in capacity building workshops</li> </ul>	<ul style="list-style-type: none"> <li>44% in 2013, 83% in 2014 and 28% in 2017 (7 (targeted) <b>Total:</b> over 50% achieved in 2014 only (partially met)</li> <li>781+ enforcement officers trained and 695+ participants in annual workshops and meetings from 2012-2017 <b>Total:</b> 1,476+ (target met)</li> </ul>
<b>Outcome 1: Improved ability of frontline customs officers and representatives of broader enforcement personnel</b>		
<b>Activity A: Technical assistance for problem solving</b>		
Output: In-situ training	<ul style="list-style-type: none"> <li>Number of In-situ trainings delivered <b>Target:</b> 12 capacity building training workshops</li> <li>Higher rating received in training evaluation <b>Target:</b> 90% participants rating good or excellent</li> </ul>	<p><b>Total:</b> 17 (target met)</p> <p><b>Total:</b> Over 90% for all years (target met)</p>
Output: Hubs of enforcement capacity building institutes	<ul style="list-style-type: none"> <li><b>Target:</b> 8 regional workshops organised during 2013-2016</li> <li>Number of national customs training institutes in region with mandatory curriculum on environmental enforcement <b>Target:</b> 2 national customs training institutes</li> </ul>	<p><b>Total:</b> 12 (target met)</p> <ul style="list-style-type: none"> <li>National Academy Customs Indirect Taxes and Narcotics India in 2017 <b>Total:</b> 1 (target partially met)</li> </ul>
<b>Activity B: Information and intelligence sharing</b>		
Output: Data on transboundary movements of HSHW in the region	<ul style="list-style-type: none"> <li>Data collected, analysed and utilised widely <b>Target:</b> data from 20 countries collected and analysed; 3 studies completed during 2013-2016</li> </ul>	<ul style="list-style-type: none"> <li>Survey completed per year from 2014-2017, results shared at annual workshop and in annual report. <b>Total:</b> 4 surveys, but unclear how many countries participated (target partially met)</li> </ul>
Output: Platform to track HSHW transboundary movements	<ul style="list-style-type: none"> <li>Number of suspicious shipments are provided with technical support <b>Target:</b> 90 traced</li> </ul>	<ul style="list-style-type: none"> <li><b>Total:</b> 96 suspicious shipments traced from 2013-2017 (target met)</li> </ul>
Output: Research on good practices - sound trade in chemicals and waste	<ul style="list-style-type: none"> <li>Successful stories and good experiences shared <b>Target:</b> 20 countries/partner shared good practices and successful stories at annual</li> </ul>	<ul style="list-style-type: none"> <li>29 countries and 39 partners have shared their experiences at annual workshops from 2013-2017 <b>Total:</b> 68 (target met)</li> </ul>

	workshops or through their submissions	
Output: REN website	<ul style="list-style-type: none"> <li>Updated and active website <b>Total:</b> 12 website general updates each year (monthly); and 20 country updates</li> </ul>	<ul style="list-style-type: none"> <li>Target of 12 website updates met in 2014, 2015 and 2017. Only 4 updates carried out in 2013 and 1 in 2016. Reason in 2016 stated as lack of capacity and website maintenance. No results provided for country updates <b>Total:</b> 41 out of 48 website updates (target partially met)</li> </ul>
Output: REN Newsflash	<ul style="list-style-type: none"> <li>Number of REN Newsflashes (newsletters) produced and circulated <b>Total:</b> 12 issues a year (monthly)</li> </ul>	<ul style="list-style-type: none"> <li>Target of 12 met in 2014, 2015 and 2017. Only 4 issues produced in 2013, however newsflash was only launched in September of that year. Only 8 issues produced in 2016 due to lack of capacity <b>Total:</b> 48 out of 52 produced (target partially met)</li> </ul>
Output: REN coverage in the partners' website/publications	<ul style="list-style-type: none"> <li>Number of partners' websites publishing REN products <b>Target:</b> 3 partners' websites publishing REN's products</li> </ul>	<b>Total:</b> 5 (target met)
Output: Regionalised tools for frontline officers to monitor and control trade in HSHW	<ul style="list-style-type: none"> <li>Number of tools in different languages in region <b>Target:</b> 2 tools produced in 3 languages</li> </ul>	<ul style="list-style-type: none"> <li>1 enforcement handbook developed and translated into 3 languages 3 working papers developed and translated into at least 3 languages and 25 country information sheets. WATCH-IT application for mobile devices developed and released (2017) <b>Total:</b> 4 different tools developed, with 2 translated into 3 different languages each (target met)</li> </ul>
<b>Outcome 2: Higher profile of environmental crimes in participating countries' national legal framework/regulations and in strategic focus of regional partners</b>		
<b>Activity C: Enforcement operations and Asia Environmental Enforcement Award</b>		
Output: Enforcement operations in the region	<ul style="list-style-type: none"> <li>Number of operations carried out with the help of REN <b>Target:</b> 4 during 2014-2016</li> </ul>	<b>Total:</b> 5 operations completed (target met)
Output: Asia Environmental Enforcement Award	<ul style="list-style-type: none"> <li>Award ceremonies organised <b>Target:</b> 2 organised during 2014-2017</li> </ul>	<ul style="list-style-type: none"> <li>No progress in 2013 and 2014. Ceremonies organised in 2015 and 2017. 2016 ceremony organised but cancelled three weeks beforehand due to demise of King of Thailand. <b>Total:</b> 3 ceremonies organised (target met)</li> </ul>
<b>Outcome 3: Well-integrated and sustainable regional enforcement network for the benefit of national, regional and global groups</b>		

<b>Activity D: Networking and awareness</b>		
Output: REN Network Workshops	<ul style="list-style-type: none"> <li>Annual workshops organized <b>Target: 5</b></li> </ul>	<ul style="list-style-type: none"> <li>1 organised per year from 2012 to 2017 <b>Total: 6 (target met)</b></li> </ul>
Output: Awareness events	<ul style="list-style-type: none"> <li>Number of awareness events organised <b>Target: 2</b></li> </ul>	<ul style="list-style-type: none"> <li><b>Total: 5 (target met)</b></li> </ul>
<b>Activity E: Partnerships for Sustainability</b>		
Output: Strategy for long-term regional enforcement networking	<ul style="list-style-type: none"> <li>Strategy elaborated and shared for consultation <b>Target: 1 strategy paper developed</b></li> </ul>	<ul style="list-style-type: none"> <li>Discussion Paper and Brochure. <b>Total: 1 (target met)</b></li> </ul>
Output: Opportunities for synergies identified and pursued	<ul style="list-style-type: none"> <li>Number of voluntary customs training workshops organised by countries on environmental enforcement <b>Target: 4 during 2014-2016</b></li> <li>Number of joint events and spin-off partnerships <b>Target: 10</b></li> </ul>	<ul style="list-style-type: none"> <li><b>Total: 4 (target met)</b></li> <li><b>Total: 19 organised with partners (target met)</b></li> </ul>

### 3. Logical framework and key targets

#### Project design

The original project document agreed in December 2011 included an initial logical framework that had limitations. The project outputs and outcomes were not clearly defined as specific, measurable, achievable, and realistic targets. However, in consultations with the donor this was addressed through the development of more measurable, targeted and realistic performance indicators in a revised logical framework and articulated through annual work plans discussed and agreed with the donor.

This revised framework was developed as part of UN Environment's application for a no-cost extension of the project, with amendments agreed on 31 March 2015 and incorporated into the 2014 Annual Report. Further revisions were made in 2016 through the formal integration of REN into the UN Environment's Programme of Work and development of a more substantive Project Document. These amendments have in turn helped to more visibly capture the key elements of the Theory of Change and intervention logic – which was lacking from the initial design.

A project management team was established in UN Environment's Asia and Pacific office in Bangkok, Thailand. During the project there were several personnel changes in the project management team as well as a transfer from the project from one division in UN Environment to another. The duration of the project was three times extended without any additional costs. National focal points in the participating countries and a steering committee were established and strategic partnerships were built with partner organizations and civil society.



## 4. Assessment of key activities and results

### Overall objective

The overall objective of the project was to reduce illegal transboundary movements of chemicals and waste in waste by improved enforcement cooperation, enhanced capacity building of front-line enforcement officers at national and regional networks through a network was achieved. During the project many seizures were reported by the participating countries, however, the reporting from countries was not done in consistent ways over the life of the project. Sometimes seizures were reported in tonnes, sometimes in number of containers, sometimes in number of cylinders and sometimes in a mix of all these. Put together, the total amount of illegally traded chemicals and waste seized and reported to the project are as follows:

- Waste: 866,000 tonnes **and** 659 containers **and** 469 seizures
- ODS: 92.6 tonnes **and** 2,231 cylinders **and** 23 seizures
- Chemicals: 114 tonnes

In addition, there were an additional 1.5 million tonnes of waste discovered and reported worldwide under a joint global enforcement operation with Interpol in 2017.

Participating countries in the network were asked to complete an annual survey to collect data around cases of illegal trafficking. However, the response rate to this survey was variable and often needed to be supplemented through information exchange with partners, including RILO AP that has a somewhat similar exercise. Strengthened coordination with RILO AP would be advisable. There were also inconsistencies in the information provided, with some countries not wishing to openly share statistics around the number of seizures. It was stated that this was often because countries did not want to outwardly admit the extent of the problem faced. In other instances, it was due to lack of understanding on the part of customs agencies around why intelligence should be shared.

### Activity area A: Technical assistance for problem solving

This activity area had the intended outcome of achieving an improved ability of frontline customs officers and representatives of broader enforcement personnel. One of the central activities in this area was to deliver capacity building workshops for front-line customs officers, environment authorities, and other government stakeholders. All targets under this activity area were met and exceeded, except for the target regarding the number of customs training institutes to establish a mandatory curriculum on environmental enforcement.

During the project 17 capacity building workshops were delivered in different participating countries in the region. Eleven national capacity building workshops were organized in Vietnam (2x), China (2x), Philippines (2x), Indonesia, Malaysia, Cambodia, Myanmar and India. Four regional workshops were held in Malaysia, China, Thailand, Cambodia and two sub-regional workshops were held in Tonga and Laos. Participants of these workshops were mainly front-line customs officers but also police-officers, environmental inspectors, coast guard officer, and officials from other relevant agencies. The officers were trained on how to navigate policy and legal frameworks regarding illegal trade in chemicals and waste, risk indicators, practical chemicals and waste detection and handling skills, repatriation procedures, and related good

practices and case studies. A central focus of the workshops was also to enhance cooperation between customs, environmental agencies and other government stakeholders. The rating for the trainings received during the evaluations of the workshops was measured in different ways during the project. 90-95% of participants rating good or excellent in 2013 and 2016. 100% met the expectations of the participants in 2014, 2015 and 2017.

In addition to workshops organized by the REN team in UN Environment, nine workshops and three border dialogue meetings were organized with another UN Environment team (the Ozone Action team), another UN agency (UNODC) and with WCO ROCB, WCO RILO AP, Interpol and INECE. To implement environmental enforcement as mandatory in the curriculum of customs, initiatives were undertaken with China's Customs College, the Philippine National Police College and with the National Academy for Customs, Indirect Taxes and Narcotics in India. The negotiations with India are on-going but there are no positive results with China and the Philippines achieved during the project. This needs to be a key focus in any follow-on project.

### **Activity area B: Information and Intelligence sharing**

As above, this activity area had the intended outcome of achieving an improved ability of frontline customs officers and representatives of broader enforcement personnel. All targets were met concerning the sharing of intelligence on suspicious shipments, sharing experiences, and development of regionalised tools. Targets were partially met on producing newsflashes and updates on the website. The following key highlights are noted:

- 96 suspicious shipments were traced, and intelligence was shared between exporting and destination countries. This led to multiple seizures and repatriations of illegal waste shipments.
- Enforcement data was collected and analysed from 20 participating countries
- 29 country case studies were shared during implementation
- 41 out of 48 planned website updates were carried out
- 24 country factsheets with relevant enforcement contacts and information
- 48 REN Newsflashes were produced and circulated during implementation.
- Four practical enforcement tools were developed, with two translated in three different languages. These are used widely by enforcement officers.

A key challenge was that some national partners remained reluctant to respond to information requests. The reason for this reluctance to share information could be due to its sensitive nature and concerns around security. There is a culture of secrecy within most customs agencies, as well as a perceived lack of trust and understanding around why the information should be shared. On the other hand, several partners shared detailed information about their seizures. Initiatives to strengthen trust in the network is crucial in any next phase.

A notable activity conducted with the Basel Action Network was an activity to gather information on what is actually happening with hazardous electronic waste after it has been collected in certain developed countries in the region by licensed waste collectors. With the aid of GPS tracking the hazardous waste was tracked to determine if the waste was exported to developing countries in the region. The results showed that while some countries dispose the waste in the country where it is collected, some waste is being exported, most likely illegally, to developing countries. Details were shared with the relevant authorities for future activities.

Two key tools which are considered a success are: (a) an enforcement handbook in pocket format developed in English and translated into three regional languages (Chinese, Vietnamese and Bahasa Indonesian); and (b) an application on the same for mobile devices. This Inspection tool 'Watch-IT' is a co-production from REN and the EU funded project 'DOTCOMWASTE'.

## **Activity area C: Enforcement operations and the enforcement awards**

This activity area had the intended outcome of achieving a higher profile of environmental crimes in participating countries' national legal framework/regulations and in strategic focus of regional partners. All targets were met. An important activity to implement this was the Asia Environmental Enforcement Awards. These awards celebrated and promoted excellence in enforcement by public organizations and officials. The first awards were held in May 2015, with a partnership with Freeland Foundation. The awards aimed to provide incentives and recognition to individual enforcement officers, teams or organizations of countries across Asia and of relevant regional organizations, to enhance motivation amongst individuals and teams/organizations, and to ensure that excellence in environmental enforcement is recognized and rewarded. The 2017 ceremony of the Asia Environmental Enforcement Award was held on the margins of the Second Forum of Ministers and Environment Authorities of Asia Pacific in September 2017 in Bangkok, Thailand. For financial reasons Freeland nor others were able to support the Wildlife category. It was decided that REN only could support the Chemicals/Waste category. The winners were selected by a judge which included the representatives from Basel Convention Regional Centres, World Customs Organizations ROCB and RILO AP. Because the 2016 awards ceremony was postponed to 2017, due to the demise of His Majesty King Bhumibol Adulyadej of Thailand, the already selected winners for 2016 received their awards during this ceremony. In total four individuals and four organizations received an Award for their outstanding efforts in combating environmental crime.

The network supported five enforcement operations in the region which were organized by China Customs, World Customs Organization, Interpol and RILO AP. These operations have led to enormous amounts of seizures of illegally traded waste and chemicals as well in the region as globally. The REN project provided regional coordination and technical support towards the enforcement operations. Operations in border areas and hot-spots were given special attention and assistance. The outcomes of the operations were actively shared in and beyond the region. These initiatives were supported via extra trainings, communication coordination among the network, and by supporting countries to attend operation meetings. Key enforcement operations included:

- In 2013 WCO initiated the global operation Demeter III, with the involvement of 11 REN participating countries in Asia. During this operation seizures of more than 7,000 metric tons of illegal waste, including hazardous waste, used vehicle parts and tyres, textiles, and e-waste were reported.
- Also in 2013 China launched its Green Fence Initiative, focusing on combating illegal shipments of waste, with China Customs declaring that combating illegal shipments of waste has been prioritized in their accountabilities. China's Green Fence Initiative has achieved a great success. Over the period of February to September 2013, China's Anti-Smuggling Bureau of China General Administration of Customs uncovered and stopped 64 groups that

engaged in smuggling waste, seized more than 847.6 thousand tons wastes; filed 156 criminal cases, arrested 423 suspects. They also filed 644 administrative cases related transboundary shipments of wastes and chemicals.

- In 2014 REN supported the Interpol Operation ENIGMA II by training officers from Police, Customs and Environmental Authorities from six countries on the control of illegal shipment of e-waste in Jakarta in July 2014. The training was the first of its kind to engage police officers from six REN participating countries in national, regional and inter-regional cooperation on fighting against waste crime.
- The WCO RILO AP initiated Sky Hole Patching project was revitalized in 2015. Agreed was to put more efforts in the exchange of information of suspicious shipments of chemicals and waste, including ODS. The WCO communication tool CENNCom was explored and promoted as a secure way to communicate information between countries, and should be actively explored as the communication modality in any follow-on REN project.
- The global Interpol Operation '30 days of action' was launched in 2017. REN initiated and supported a pre-operational meeting in Singapore. Seven targeted countries participated in this Operation which led to the discovery of 1.5 million tonnes of illicit waste worldwide. The operation was awarded by the 'Leonardo di Caprio foundation' as the best enforcement initiative in 2017.

### **Activity area D: Networking and Awareness**

This activity area had the intended outcome of a well-integrated and sustainable regional enforcement network for the benefit of national, regional and global groups. All relevant targets were met, but further work could be done to strengthen the network (discussed below).

In terms of key activities, annual workshops were held each year and five awareness raising events were organised. The workshops were held in respectively Philippines, Thailand (3x), Sri Lanka and China. The main objectives of these different workshops were to:

- Facilitate exchange of information, customs intelligence and experiences of trans-boundary movement of hazardous chemicals and waste and enforcement of import/export controls in the participating countries;
- Disseminate information on emerging trends and issues concerning transboundary movements of chemicals and waste;
- Increase awareness over existing and emerging trade dynamics in the region concerning chemicals and waste to be controlled;
- Discuss about regional approaches for handling of trans-boundary movements of chemicals and waste, improvement of risk profiling systems and the development of enforcement tools; and
- Exchange views and experiences on expanded dimensions such as on how to build awareness raising on gender and human rights aspects in the network.

To expand awareness REN also participated in several other events as side events at the MEA COP meetings, RILO AP National Contact Point meetings, Foreign Law Enforcement Customs Community in China and Interpol Pollution Working Group meetings. Under the Green Customs

Initiative the project team co-organized several awareness events in Afghanistan, China, Korea (2x) and the Maldives.

### **Activity area E: Partnership for sustainability**

This activity area also had the intended outcome of a well-integrated and sustainable regional enforcement network for the benefit of national, regional and global groups. Relevant targets were met, but much more could be done to ensure a sustainable network (discussed below). Key activities under this area included the organization of joint events with countries and partners, which led to several of the participating countries voluntarily organizing their own national customs training workshops on environmental enforcement, using the material and lessons of REN. For example, China organized at least two workshops and also Korea and Afghanistan have organized national workshops. The project also prepared a strategy document that reviewed the business model of other similar enforcement networks. This was prepared and shared for consultation, in the form of a discussion paper leading to brochure. Various consultations were held on this to solicit important inputs for a potential future project.

Similar regional networks continue to face challenges on financial sustainability. As documented in the survey conducted by AECEN for their network in 2011, even the beneficiaries, who highly value regional networking and are willing to contribute in-kind to the effort, expect financial support for the networking to come from external sources. To save costs, the REN project opted for the “piggy-backing” approach as the main style of implementation approach whereby activities were often delivered by partner agencies as part of their own work programmes.

## **5. Additional outcomes from the project**

Despite not directly planned in the logical framework of the project document several activities have been completed to address issues of gender, human rights and corruption. Many chemical substances that are illegally trafficked can cause damage to fauna and flora, ecosystems and to human health. Certain hazardous and toxic chemicals can have potentially disproportionate effects on women and children, for instance in the bioaccumulation of some specific toxins and subsequent transfer of contaminant load to offspring via breastfeeding. The project has supported UN Environment’s commitment to mainstream gender equality and equity in its programmes. Documents and materials produced in the project were gender sensitive in language and content, and training and activities have been considered for a gender balance issue.

It is also evident that corruption is associated with illicit flow. Issues of gender, human rights and anti-corruption were, however, dealt with in a limited way during the project design. They were raised only in the later stages of implementation. This re-prioritisation was largely driven by the requests of the donor, but also increased recognition by the project team of these issues. This was particularly evident at the 18th ARPEC Meeting of 2017 and 5th and 6th Annual REN Workshops of 2016 and 2017 where specific sessions were held on these areas. Another example includes REN’s partnership with the Pesticides Action Network in Asia Pacific (PANAP) to understand the impact illegal pesticide production and use has on woman and the role that gender can play in helping communities to adopt ecologically sound agricultural practices.

Whilst several activities have been conducted to date, the project team has acknowledged that these issues should be further prioritised in the next phase of work. Several ideas were presented

for review and discussion at the 6th Annual REN Workshop. These included: gender champion awards to raise the profile of gender in the region; establishing a gender network for female enforcement officers; and greater investment in research and analysis. The issue of human rights also needs effective integration into any new project proposal.

## 6. Additional challenges during implementation

In addition to the issues raised above, there were some notable challenges during implementation concerning staffing, monitoring and country engagement.

### Staffing

UN Environment through its regional office in Bangkok implemented this project. The project was coordinated by a coordinator, supported by a part-time assistant and guided on daily basis by the Regional Coordinator for Environmental Law and Governance from the Law Division of UN Environment and also based in Bangkok. Internal ownership of the project changed in April 2013. Initially, it sat within DTIE's OzonAction Team (former CAP). However, given the team's focus on ODS, ownership of the project was changed to Law Division (former DELC). This was a positive move as it allowed for much broader focus on the enforcement of all four MEAs.

In addition to overall ownership, there has been some fluctuation in staffing over the course of the project. The project was coordinated by three different consultants and staff. The technical supervision was carried out by a P4 Project Manager in 2012 from OzoneAction and from 2013 until 2018 by a P4 Project Manager from Law Division. Firstly, the recruitment process for the P3 Programme Officer took a long time until October 2014. Secondly, there have been changes in the size and make-up of the project team. There were some concerns initially with these staffing changes on the donor side. However, there was no suggestion that this negatively impacted operational performance or the achievement of outcomes.

### Project design and monitoring

According to the initial project document monitoring would be done by the Project Officer and reported to the donor through yearly progress reports. The Logical Framework which was part of this document summarized the Indicators and Means of Verification. UN Environment provided the donor with annual work plans and budgets and substantive reports. The logical framework included in the initial Project Document did not include SMART indicators. However, this was subsequently rectified through the redesign of the logical framework in March 2015.

The main monitoring and reporting mechanism with the donor was the annual consultation process. As part of this consultation, an update was provided on the previous year's work through the Annual Report, together with a proposed workplan and budget for approval. This facilitated the tracking of progress against SMART indicators towards the achievement of project outputs and outcomes. The workplan was recently updated to incorporate more granular financial data per category/activity at the donor's request.

Since 2016 project monitoring have been conducted periodically through a six-monthly review in accordance with the practices of the UN Environment Project Information and Management System (PIMS). Data collection and processing of key documents have been undertaken by the project team to monitor the progress made against each project output, planned milestone, deliverable and associated indicator, using the sources described in the project.

## Country engagement

The engagement of the participating countries was very diverse. There were countries with a notably strong engagement (e.g. China and Korea) and some countries which hardly engaged. During the project the engagement by several countries was improved such as with responding to surveys, participation in activities such as workshops and operations. At the other hand there were countries which were not responding and participating in events at all. A stakeholders analysis and strategy at the beginning of the project should have given guidance how to have more engagement. This should be taken in a new project proposal, as well as consideration of adopting different 'categories' of participation. For example, there could be 'lead' countries that would have a more prominent role and responsibility in the network. These would be identified and selected on the basis of defined criteria.

## 7. Remaining challenges in the region

The Asian region continues to be one of the main destinations for improper waste management and the use of banned chemicals. China including Hong Kong, India, Indonesia, Malaysia, Vietnam, and the Philippines are receiving the majority of imported solid wastes. Bangladesh, India and Pakistan continue as the main destinations for ship dismantling. It's not only waste and chemicals coming from outside the Asia Pacific region which are being transported illegally. As Asian countries rapidly industrialise, and their citizens enjoy higher income and living standards, the consumption and disposal of wastes within Asia Pacific will continue to increase.

Waste crime continues to be seen as a low-risk, high-reward crime for organized criminal networks which exploit differences in legislation between countries and regions, as well as weak enforcement systems. Criminal groups involved in the illegal disposal of electronic waste have also been found to be involved in human, drug and firearms trafficking, fraud and money laundering. In summary, the following key remaining challenges are recognized:

- **Enforcement chain** challenges, e.g. prosecutors and judges need to be involved;
- There is an **uneven policy and regulatory landscape** across the region (e.g. China's new policy on banning foreign waste has not yet been replicated by other countries in the region, meaning that waste shipments from outside of the region will and are moving to other countries);
- **New threats** are arising, such as illegal trade in mercury, with limited human and institutional capacity to deal with it;
- There is a **growing demand for raw materials and harmful chemicals**;
- There is **weak enforcement and limited capacity in some countries** in the region;
- Improvement of **multi-agency cooperation is highly needed** as well on national as regional and international level;

- Elevation of **gender and human rights** considerations into combating illegal trade in waste and chemicals is still needed;
- **Corruption** in enforcement agencies and other authorities remains significant.

## 8. Proposal for a follow-on project

Based on the various consultations with country stakeholders, civil society, potential donors, and other UN agencies a new project proposal will be drafted to seek to address remaining challenges. Without prejudice to the ongoing design consultations, the following elements are currently considered important for the design of any follow-on project:

- **Building a more sustainable enforcement network in the Asia Pacific region.** The sustainability can be improved by more country engagement, with clearer roles of the various stakeholders/participants.
- **The role of UN Environment would be more the role of a coordinating secretariat,** with key project activities led more by the participating countries themselves.
- The **activities shall expand from a training and capacity building focus** to more strategic joint operational enforcement activities.
- Support to these activities such as **technical support and tool development will remain an important activity.**
- The implementation of training workshops, capacity building and anti-corruption activities should be organized in close cooperation with other agencies such as **UNODC.**
- The **follow-up actions concerning gender and human rights** will be in close cooperation with civil society and other UN agencies such as ILO.

The next project, once developed and approved and subject to funding, is anticipated to start in January 2019. Unfortunately there will be a gap in implementing many activities but a few, such as the Asia Environmental Enforcement Awards, will continue to be organized by UN Environment in cooperation with others.

## 9. Conclusions and recommendations

It is important to recognise that this project has achieved important successes, despite the initial stumbling blocks around project design. These include: (a) Seizures of over 865,000 tons of hazardous chemicals and harmful waste; (b) Establishing national and regional communication pathways to facilitate enforcement; (c) Facilitating inter-regional engagement to reduce waste trafficking; (d) Creating attitudinal change in enforcement agencies; (e) Integrating enforcement with gender and human rights; and (f) Facilitating significant policy changes in some countries to stop waste trafficking.



However, whilst REN has built a strong foundation, several improvement areas can be identified. If addressed, they could enable REN to move beyond awareness raising and relationship building to operating as a real network of enforcement partners that can achieve long-term, sustainable results. As identified in the terminal review and explained more fully in Annex B, these include: (a) Pinpointing partner capabilities; (b) Reducing barriers to intelligence exchange; (c) Encouraging greater collaboration; (d) Cultivating widespread ownership of enforcement issues; (e) Raising public awareness; and (e) Moving from awareness to action on social issues.

## Annex A - Project Logical Framework with Key Targets

Project Outcome/Objective	Indicators	Means of Verification
<p>Reduced illegal transboundary movement of chemicals and waste in Asia by improved enforcement cooperation and enhanced capacity-building of frontline enforcement officers at the national and the regional levels through a network,</p>	<p>- Number of seizures of ODS and hazardous waste reported by countries  <b>Target: 500 seizures (including ODS, other chemicals and wastes)</b></p> <p><b>Progress:</b>  <b>2013:</b> 218 waste seizures, 20 ODS seizures and 15 other chemicals seizures  <b>2014:</b> 3 ODS and 40 waste seizures cases  <i>China: 68 cases, 213,000 tons</i>  <b>2015:</b> 143 seizures cases with a total of 7,829,159 kg and 18,236 pieces of seized wastes and ODS  <b>2016:</b> Seizures of more than 500 containers with waste, more than 100 cylinders of ODS and 73 tons of chemicals  <b>2017:</b> 866,800 tonnes and 159 containers with waste, 24,6 tonnes and 548 cylinders ODS and 26 tonnes of chemicals</p> <p>- % participating countries signing up global, regional and national enforcement operations targeting illegal trafficking of chemicals and waste, and involved;  <b>Target: 50% of REN participating countries</b></p> <p><b>Progress:</b>  <b>2013:</b> 11 of 25 participating countries (44%) joined in the WCO global enforcement operation Demeter III in 2013  <b>2014:</b> 5 countries (83%) participated in the Interpol Operation Enigma II (targeting 6 Asian countries)</p>	<p>- Reports from participating countries and partners, or media coverage.</p> <p>- Records of partners who initiate global, regional and national operation                      -Analysis of intelligence shared through WCO CEN</p> <p>- Reports from national customs authorities and the results of the global, regional operations.</p>

**2015:** revitalization of Operation Sky Hole Patching discussed in the Green Customs Workshop in Korea in November 2015 and 4<sup>th</sup> REN Annual workshop in November 2015.

**2016:** Continuation of working with Operation Sky Hole Patching.

**2017:** 7 countries participated in the Interpol Operation 30 days of Action.

- Improved ability of the front-line customs officers and representatives of the broader enforcement personnel

**Target: 1000 enforcement officers trained or involved in REN regional, sub-regional and national capacity building workshops**

**Progress:**

**2012-13:**

- 110+ frontline Customs officers in Vietnam and China's training workshop
- 200+ participants (including customs officers) in the two annual network workshops
- 25+ participants in sub-regional border dialogue meeting in Laos
- 120+ customs officers in the workshop by RILO AP organized in Korea and Vietnam
- 100+ participants in the four ARPEC meetings

**2014:**

- More than 180 enforcement officers from 24 countries were trained
- 60 participants in the 2014 annual network workshop
- 30 participants in the 9<sup>th</sup> ARPEC meeting

**2015:**

- More than 160 enforcement officers from 29 countries were trained by 2 regional and 2 national customs training workshops
- 38 participants in the 2015 annual network workshop
- 33 participants in the 17<sup>th</sup> ARPEC meeting

**2016:** 65 officers trained in the two National workshops

	<p>44 participants at the Annual REN workshop  45 participants at the RILO AP NCP meeting  25+ officers trained during border dialogue in Nepal  33 trainers trained in India  <b>2017:</b> in total 208 officers were trained during the various National Capacity Building and Green Customs Initiative workshops</p>	
Key Outputs		
Key Outputs	Indicators	Means of Verification
<b>1) Improved ability of the front-line customs officers and representatives of the broader enforcement personnel</b>		
<b>ACTIVITY A: TECHNICAL ASSISTANCE FOR PROBLEM SOLVING</b>		
In-situ training	<p>Number of In-situ training delivered  <b>Targets: 12 capacity building training workshops organized or supported during 2013-2016</b></p> <p><b>Progress:</b>  <b>2013:</b>  - 2 national workshops organized in China and Vietnam in Dec.;  - 2 WCO RILO AP annual networking and capacity building meetings  <b>2014:</b>  - 2 national training workshops organized  - 2 sub-regional training workshops organized  <b>2015:</b>  - 2 national training workshops organized  - 2 regional training workshops organized  <b>2016:</b>  -2 national workshops organized  <b>2017:</b>  -3 national workshops organized</p>	<p>Workshop reports, documentation on cases of problem-solving assistance, as reported in the REN Newsflash</p> <p>Meeting evaluation results</p> <p>Copy of training programme at the regional training hubs, media reports, partners' activities documented in the REN Newsflash</p> <p>Reports from participating countries</p>

<p>Hubs of enforcement capacity-building institutes</p>	<p>Higher rating received in the training workshop evaluation</p> <p><b>Target: 90% participants rating good or excellent.</b></p> <p><b>Progress:</b>  <b>2013:</b> 90% participants rating excellent and good  <b>2014:</b> 100% met the expectations of the participants  <b>2015:</b> 100% met the expectations of the participants  <b>2016:</b> Over 95% participants rating good of excellent  <b>2017:</b> 100% met the expectations of the participants</p> <p>Number of environmental training courses offered annually by other enforcement partners</p> <p><b>Targets: 8 regional workshops organized during 2013-2016</b></p> <p><b>Progress:</b>  <b>2013:</b> 3 environmental workshops/seminars were organized by WCO ROCB  <b>2014:</b>  - 1 operational workshops co-organized with Interpol and INECE;  - 1 border dialogue organized by OzonAction Compliance Assistance Programme;  <b>2015:</b>  - 2 regional workshops co-organized with OzonAction Compliance Assistance Programme and RILO respectively.  - 1 border dialogue organized by OzonAction Compliance Assistance Programme;  <b>2016:</b>  -1 border dialogue co-organized with OzonAction Compliance Assistance Program</p>	
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	<p>-1 train the trainer workshop co-organized with OzonAction Compliance Assistance program</p> <p><b>2017:</b></p> <p>-2 national Green Customs Initiative workshops organized</p> <p>Number of national customs training institutes in the region with a mandatory curriculum on environmental enforcement</p> <p><b>Progress:</b></p> <p><b>2014:</b> Ongoing discussion with China's Shanghai Customs College</p> <p><b>2015:</b> Ongoing discussion with Philippine National Police College;</p> <p><b>2016:</b> no results due to lack of capacity</p> <p><b>2017:</b> start negotiations with National Academy Customs Indirect taxes and Narcotics (NACIN) India</p>	
<b>ACTIVITY B: INFORMATION AND INTELLIGENCE SHARING</b>		
<p>Data on trans-boundary movements of HSHW in the region</p>	<p>Data collected, analysed and utilized widely</p> <p><b>Target:</b></p> <p><b>20 countries' data collected and analysed</b></p> <p><b>3 studies completed during 2013-2016</b></p> <p><b>Progress:</b></p> <p><b>2013:</b></p> <p>- Data from 10 participating countries collected and analysed</p> <p><b>2014:</b> A preliminary survey on e-waste completed.</p> <p><b>2015:</b> A desk study on illegal trade in chemicals and waste conducted and results presented at the 4<sup>th</sup> REN annual meeting.</p> <p><b>2016:</b> Survey conducted, the results shared in annual report</p> <p><b>2017:</b> Survey conducted, the results shared during the 6<sup>th</sup> Annual REN meeting</p>	<p>Date and related information submitted by participating countries</p> <p>Working papers/documents/ presentations produced and distributed</p> <p>E-mails, communications with the countries and partners</p>

<p>Platform to track HSHW transboundary movements</p>	<p>Number of suspicious shipments are provided with technical support  <b>Target: 90 suspicious shipments are traced to help countries in tracking HSHW shipments to the region.</b></p> <p><b>Progress:</b>  <b>2013:</b> 79 during Demeter III;  <b>2014:</b> 2 suspicious shipments were cooperated with Belgium and the Netherland  <b>2015:</b> 7 suspicious shipments were cooperated with Belgium and the Netherland  <b>2016:</b> 2 suspicious shipments were cooperated with Belgium and 2 were cooperated with the Netherlands (total 16 containers) Further involvement in two cases concerning 215 containers coming from Romania and UK  <b>2017:</b> 2 suspicious shipments tracked, and info shared (involvement of 22 containers)</p>	
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<p>Research on good practices - sound trade in chemicals and waste</p>	<p>Successful stories and good experiences shared</p> <p><b>Target: 20 countries or partners shared their good practices and successful stories at the annual workshops or through their submissions</b></p> <p><b>Progress:</b>  <b>2013:</b> 5 countries and 5 partners shared their experiences and good practices at the REN annual workshops  <b>2014:</b> 7 countries and 9 partners shared their good practices at REN meetings  <b>2015:</b> 4 countries and 11 partners shared their good practices at REN meetings  <b>2016:</b> 9 partners and 7 countries shared their experiences during REN meetings  <b>2017:</b> 6 countries and 5 partners gave an update on their experiences at REN meetings</p>	<p>Documents/ presentations at the REN annual workshops</p> <p>Counties submissions</p>
<p>REN website</p>	<p>Updated and active website</p> <p><b>Target:</b>  - 12 website general updates each year (monthly)  - 20 country updates</p> <p><b>Progress:</b>  <b>2013:</b> 4 updates (Oct-Dec)  <b>2014:</b> 12 updates  <b>2015:</b> 12 updates  <b>2016:</b> 1 update (lack of capacity and website need maintenance)  <b>2017:</b> 12 updates</p>	<p>Website with all hyperlinks functioning</p>





<p>REN coverage in the partners' websites/ publications</p> <p>Regionalized tools for front-line officers to monitor and control trade in HSHW</p>	<p>- Number of partners' websites publishing REN's products <b>Target: - 3 partners' websites publishing REN's products</b></p> <p><b>Progress:</b>  <b>2014:</b> - <i>REN Newsflash regularly uploaded to WCO Environet and BRS website;</i>  - <i>INECE website provides the -link for REN</i>  <b>2015:</b> - <i>REN Newsflash regularly uploaded to WCO Environet and BRS website;</i>  - <i>INECE website provides the -link for REN</i>  <b>2016:</b> <i>REN Newsflash regularly uploaded to WCO Environet and BRS website;</i>  - <i>INECE website provides the -link for REN</i>  <b>2017:</b> <i>REN Newsflash regularly uploaded to WCO Environet and BRS website;</i>  -<i>INTERPOL website mentioned REN for the support in Operation 30 days of action</i>  -<i>Website of Montreal Protocol mentioned efforts in train the trainer workshop in Afghanistan</i></p> <p>Number of tools in different languages in the region <b>Target: 2 tools produced in 3 languages</b></p> <p><b>Progress:</b>  <b>2014-</b> <i>The enforcement handbook has been developed</i>  <b>2015-</b> <i>The enforcement handbook has been released and translated into Chinese, Vietnamese and Bahasa Indonesia.</i>  <i>Three working paper developed;</i>  <i>Country Information Sheet updated.</i>  <b>2016-</b> <i>No activities, Arabic/Persian version cancelled</i>  <b>2017-</b> <i>handbook in Baha Indonesia released</i>  <i>WATCH-IT Application for mobile devices developed and released.</i></p>	<p>Copies of the tools</p> <p style="text-align: right;">25</p>
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2) Higher profile of environmental crimes in participating countries' national legal framework/ regulations and in strategic focus of regional partners		
ACTIVITY C: ENFORCEMENT OPERATIONS AND ASIA ENVIRONMENTAL ENFORCEMENT AWARD		
Enforcement operations in the region	<p>Number of operations carried out with the help from REN  <b>Target: 4 operations facilitated and supported by REN during 2013-2017</b></p> <p><b>Progress:</b>  <b>2013:</b> 2 Operations (<i>Demeter III and Green Fence</i>) supported;  <b>2014:</b> 1 Operation <i>Enigma II (Interpol)</i> supported;  <b>2015:</b> Revitalization of Operation <i>Sky Hole Patching</i> discussed at the Regional Green Customs Workshop in Seoul in November and at the 4<sup>th</sup> REN workshop in November in Bangkok.  <b>2016:</b> Continuation cooperation with <i>Sky Hole Patching</i>. Preparation of an Operation with Interpol in 2017  <b>2017:</b> Supported and participated in the pre-operational phase the Interpol Operation 30 days of action.</p> <p>Award ceremonies organized  <b>Target: 3 award ceremonies prepared during 2014-2017</b></p> <p><b>Progress:</b>  <b>2015:</b> The first AEEA ceremony organized in May in Bangkok. Five individuals and eight organizations awarded.  <b>2016:</b> Award ceremony postponed due to demise of His Majesty King Bhumibol Adulyadej  <b>2017:</b> The second AEEA ceremony organized in September. Four organizations and four individuals awarded included the 2016 selected winners.</p>	Records including news release Invitation letters distributed, information available on REN website, news release, media reports, Award ceremonies, etc.
Asia Environmental Enforcement Award		
3) Well-integrated and sustainable regional enforcement network for the benefit of national, regional and global groups		

<b>ACTIVITY D: NETWORKING AND AWARENESS</b>		
REN Network Workshops	<p>Annual workshops organized <b>Target: 5 annual workshops</b></p> <p><b>Progress:</b> <b>2012:</b> 1<sup>st</sup> one organized <b>2013:</b> 2<sup>nd</sup> one organized <b>2014:</b> 3<sup>rd</sup> one organized <b>2015:</b> 4<sup>th</sup> one organized <b>2016:</b> 5<sup>th</sup> one organized <b>2017:</b> 6<sup>t</sup> one organized</p>	<p>Workshop reports, News release</p> <p>Meeting evaluation</p>
Awareness events	<p>Number of awareness events organized <b>Target: 2</b></p> <p><b>Progress:</b> <b>2015:</b> Represented at the side event in the COP of Basel/Rotterdam/Stockholm Conventions in May 2015 in Geneva; Received the visit of the Philippines National Police College <b>2016:</b> Participated at the 28<sup>th</sup> RILO AP NCP meeting <b>2017:</b> Represented at the side event in the COP of Basel/Rotterdam/Stockholm Conventions in May 2017 in Geneva; participation in the 22<sup>nd</sup> Interpol Pollution Crime Working Group;</p>	<p>Workshop reports, News release</p>
<b>ACTIVITY E: PARTNERSHIPS FOR SUSTAINABILITY</b>		
Strategy for long-term regional enforcement networking	<p>Strategy elaborated and shared for consultation <b>Target: 1 strategy paper developed</b></p> <p><b>Progress:</b> <b>2015:</b> a preliminary draft prepared. <b>2016:</b> Continuation working on draft <b>2017:</b> The draft used as input for the discussion paper for the new</p>	<p>Review of the strategic documents and the communications from the Coordinating Agencies and the Partner Agencies</p>

<p>Opportunities for synergies identified and pursued</p>	<p><i>project proposal</i>  <i>A discussion paper for a follow-up project prepared</i>  <i>A stakeholder meeting organized in February 2018</i></p> <p>Number of voluntary customs training workshops organized by the countries on environmental enforcement  <b>Target: 4 during 2014-16</b>  <b>Progress:</b>  <b>2014:</b> <i>China organized two national green customs workshops</i>  <b>2015:</b> -  <b>2016:-</b>  <b>2017:</b> <i>Korea and Afghanistan organized national green customs workshops</i></p> <p>Number of joint events and spin-off partnerships  <b>Target: 10</b>  <b>Progress:</b>  <b>2012:</b> <i>1 - 1<sup>st</sup> annual network workshop was jointly organized with Asian Network;</i>  <b>2013:</b> <i>3 – 1) 2<sup>nd</sup> annual network workshop was jointly organized with Asian Network and ENFORCE; 2) the China training was jointly organized by with BCRC China and China Customs; and 3) the Vietnam training seminar was jointly organized with BCRC China and Vietnam Customs</i>  <b>2014:</b> <i>3 – 1) 2 sub-regional joint workshops; 2) 1 joint border dialogue were jointly organized with OzonAction CAP; and 3) 1 operational workshop with Interpol</i>  <b>2015:</b> <i>4 joint/spin-off partnership events:</i>  <i>- Regional Customs Training workshop in Malaysia in April 2015;</i>  <i>-Regional Green Customs Training Workshop in Korea in November</i></p>	<p>Copy of the document /News release  Reports from participating countries</p> <p>Copy of concept papers, media reports, etc.</p>
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	<p>2015.  -AEEA 2015 ceremony organized at the margin of Asia Environmental Ministerial Forum and Rule of Law Roundtable in May 2015.- Border Dialog Meeting on Control of Illegal ODS Trade in the Border between Thailand and Lao PDR (December 2015)  <b>2016:</b> Border dialogue meeting in Nepal  Train the trainer workshop in India  <b>2017: 1)</b> 18<sup>th</sup> ARPEC meeting organized in partnership with UNODC;  2) Training in Vietnam was organized in cooperation with UNODC/WCO CCP and INECE; 3) Green Customs workshop in Korea was organized in cooperation with Korea Customs Services; 4) National Capacity Building workshop in India was co-organized with CAP team; 5) National Capacity Building workshop in Cambodia was organized in cooperation with the National Ozone Unit in Cambodia.</p>	
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## Annex B: Terminal Review Findings, Lessons Learned and Recommendations

### Summary of Findings

- i. The project was rated as **moderately satisfactory**. This was determined following review against each of the following criteria: strategic relevance; quality of design; nature of external context; effectiveness; financial management; efficiency; monitoring and reporting; sustainability; and factors affecting performance. A summary of the findings is provided below, together with the ratings table.
- ii. **Strategic relevance** – The project closely aligned to the relevant UN Environment medium-term strategy and programmes of work, as well as UN Environment and Donor priorities. It encapsulated the key environmental, social and economic challenges relating to dumping of hazardous waste, production and consumption of ozone depleting substances, and control of chemicals on a national, regional and global scale. It built effectively on previous and existing interventions to engage stakeholders and efficiently deliver outputs.
- iii. **Quality of Project Design** – Several weaknesses were identified in the initial project design, including: lack of a Theory of Change and measurable indicators in the logical framework; inadequate stakeholder analysis; and limited discussion on gender equality. However, many of these issues were addressed during implementation.
- iv. **Nature of External Context** – No assessment was made of unusually challenging operational factors that could have impacted project performance, such as the likelihood of conflict, natural disaster or change in government. Some risk analysis was carried out during implementation, but this was limited.
- v. **Effectiveness** – With 21 output level indicators in total, 16 were met and five partially met. Two out of the three project outcomes were fully achieved. Areas of success included training, development of supporting tools, networking events and joint enforcement operations. Lack of project resources, together with insufficient country ownership were the main stumbling blocks for completion of project activities. Many of the outputs generated greater understanding of environmental issues amongst customs officers, as well as increased engagement with environmental authorities. Collaboration on a regional and global scale has also increased – although further information exchange and joint operations are required to generate sustained results.
- vi. **Financial Management** – The budget was managed carefully through the annual consultation process with the Donor. Annual financial statements were verified and submitted to the Donor – although these statements lacked granularity. The project complied with all relevant UN financial management standards and procedures. Internally, communication between the Project Manager and Fund Management Office was clear and responsive to project needs.
- vii. **Efficiency** – The project has been very successful in creating efficiencies to prolong the length and reach of the network. The design paid focus to the inclusion of delivery mechanisms to support the

achievement of outcomes to time and budget through collaboration with partner agencies. However, the project could have been more effective in carrying out collaborative projects, with partners largely operating in silos. Greater use could also have been made of pre-existing data sources to generate more accurate data on seizures.

- viii. **Monitoring and Reporting** – The monitoring design was undermined by inadequacies in the initial logical framework and workplan. These issues were subsequently rectified during implementation. The yearly consultation process with the Donor to review progress and define priorities for the upcoming year was robust. From 2016 onwards, the project also reported internally via the UN Environment’s Project Information and Management System. Requests for information from partners were less successful, with the degree and validity of information reported through the annual survey mixed. As agreed with the Donor, the 2013 Annual Report was used as an informal mid-term evaluation.
- ix. **Sustainability** – The project has not managed to generate a sufficient level of ownership by national and regional stakeholders to allow for results to be sustained. Whilst the project stimulated a real change in attitudes in some countries this was not consistent, with some representatives operating with insufficient government backing. Without the network it is unlikely that some countries will continue to act in this area. The continuation of results beyond the project lifespan is still dependent on financial resources, with a culture of reliance on external donors prevalent across the region. The current institutional set-up of the project is not sustainable, with UN Environment taking a hands-on project management role.
- x. **Factors Affecting Performance** – As stated above, the project’s preparation and readiness were deemed inadequate, resulting in a slow start. Despite several changes in personnel and to the governance model, the quality of project management and supervision was deemed adequate. There was some confusion around the decision-making process, suggesting that the project would have benefited from a more structured governance model. Effective working relationships were maintained internally, particularly between UN Environment divisions. Methods of communication with partners were less successful in driving engagement, with some countries still reluctant to collaborate and take ownership. The project’s responsiveness to human rights and gender equity improved in the latter part of the project, as evidenced by increased focus on gender issues at training events and workshops and increased participation from women. However, this is noted as an area of focus for the next stage of work. Existing communications channels and networks were used effectively, with new channels also established with mixed success. Public awareness has been identified as an area for improvement, despite increased media coverage more recently.

**Table 1: High Level Summary of Review Ratings**

<b>Criterion</b>	<b>Rating</b>
<b>Strategic Relevance</b>	<b>Highly satisfactory</b>
Alignment to MTS and POW	Satisfactory
Alignment to UN Environment/Donor/GEF Strategic Priorities	Satisfactory
Relevance to regional, sub-regional and national environmental priorities	Highly satisfactory
Complementarity with existing interventions	Satisfactory
<b>Quality of Project Design</b>	<b>Moderately unsatisfactory</b>
<b>Nature of External Context</b>	<b>Moderately unfavourable</b>



<b>Effectiveness</b>	<b>Satisfactory</b>
Achievement of outputs	Satisfactory
Achievement of direct outcomes	Satisfactory
Likelihood of impact	Moderately likely
<b>Financial Management</b>	<b>Satisfactory</b>
Completeness of project financial information	Moderately satisfactory
Communication between finance and project management staff	Moderately satisfactory
<b>Efficiency</b>	<b>Satisfactory</b>
<b>Monitoring and Reporting</b>	<b>Moderately unsatisfactory</b>
Monitoring design and budgeting	Moderately unsatisfactory
Monitoring of project implementation	Moderately satisfactory
Project reporting	Satisfactory
<b>Sustainability</b>	<b>Unlikely</b>
Socio-political sustainability	Unlikely
Financial sustainability	Unlikely
Institutional sustainability	Unlikely
<b>Factors Affecting Performance</b>	<b>Moderately unsatisfactory</b>
Preparation and readiness	Moderately unsatisfactory
Quality of project management and supervision	Moderately satisfactory
Stakeholder participation and cooperation	Moderately unsatisfactory
Responsiveness to human rights and gender equity	Moderately satisfactory
Country ownership and driven-ness	Moderately unsatisfactory
Communication and public awareness	Moderately unsatisfactory
<b>Overall</b>	<b>Moderately satisfactory</b>

## Lessons Learned and Recommendations

- xi. Many lessons can be learned and applied to future projects. A summary of the strategic lessons is provided below, together with recommendations that can be implemented to achieve greater success. Operational level lessons are included in the main body of the report.
- xii. **Lesson 1: Pinpointing partner capabilities** - Understanding, involvement and ownership of project activities was impeded by lack of informed stakeholder analysis and risk assessment. Interests, concerns and capabilities must be fully understood to create a shared vision and design suitable engagement and delivery channels to achieve success. This can be achieved by:
  - a. Conducting detailed stakeholder analysis and mapping at design stage to identify project beneficiaries and change agents. This should include: goals and expectations; motivation to support change; concerns; and capabilities; and
  - b. Working with stakeholders to develop a detailed workplan, matching capabilities to project activities. This plan should be reviewed with stakeholders (and not just the Donor) on a regular basis as determined by the project governance and reporting structure to increase engagement.
- xiii. **Lesson 2: Reducing barriers to intelligence exchange** - National partners have remained reluctant to share sound and comprehensive intelligence to inform the network's strategic and operational focus. This can be addressed by:

- a. Building a clear stakeholder engagement strategy and plan, including initiatives to build trust between enforcement communities and understanding of how intelligence will be used;
  - b. Including more frequent remote and face-to-face networking opportunities within this plan to build trust and understanding;
  - c. Increasing maintenance of the centralised contact list; and
  - d. Introducing incentives for information sharing, such as public recognition.
  
- xiv. **Lesson 3: Encouraging greater collaboration** - most project activities were delivered by a single partner in consultation with UN Environment. This not only places greater pressure on UN Environment as the coordinating agency, but also limits the reach and effectiveness of outputs. This can be rectified by:
  - a. Increasing clarity on the vision and goals of the network through development of a stakeholder engagement strategy and plan and consultation on the Theory of Change with stakeholders;
  - b. Utilising governance forums for strategy design and development;
  - c. Conducting strategy sessions with partners to identify opportunities for cross collaboration;
  - d. Involving partners in the planning process to encourage greater ownership; and
  - e. Introducing incentives for collaboration, such as public recognition.
  
- xv. **Lesson 4: Cultivating widespread ownership of enforcement issues** - Whilst most partners recognise the network's value, they do not have sufficient government backing or incentives to drive change. Further ownership of the project's vision, outcomes and outputs must be generated to increase the network's sustainability. This can be facilitated by:
  - a. Developing a detailed communication and engagement strategy and plan describing how stakeholders will be moved along the commitment curve from understanding to ownership. This would not only help to generate greater ownership within the network but drive communication outside of the enforcement community;
  - b. Consulting stakeholders during the design of the Theory of Change to create a shared vision for the project;
  - c. Developing more precise Terms of Reference for the focal point role to increase transparency on expectations. These should be designed with and signed off by partners;
  - d. Seeking senior government and Advisory Board sign-off of focal points to ensure they have sufficient backing;
  - e. Designing a governance structure that involves partners in the decision-making process, rather than relying on UN Environment to take on this role;
  - f. Holding partners to account for outputs they are responsible for delivering in the workplan;
  - g. Continuing to draft and implement memorandums of understanding with national and regional stakeholders to formalise their commitment to the network; and
  - h. Considering how advocates of the network can be used as change agents.
  
- xvi. **Lesson 5: Raising public awareness** - Although steps have been taken to increase awareness outside of enforcement channels, this has been limited. Greater focus must be paid to increasing public awareness to compel national, regional and global stakeholders to take ownership and act responsibly. This can be accomplished by:
  - a. Developing a detailed stakeholder engagement and communications strategy and plan that includes target groups and beneficiaries outside of the enforcement network – this should include a media strategy;

- b. Increasing media coverage of the Asia Environmental Enforcement Awards, network meetings and enforcement operations; and
- c. Conducting and publicising more research highlighting the impact of illegal trafficking of waste and chemicals on local communities and vulnerable groups.

xvii. **Lesson 6: Moving from awareness to action on social issues** - Although awareness has been generated around social issues, the network needs to identify and implement concrete actions in relation to gender, human rights and corruption that will positively impact the ultimate beneficiaries of the project. This can be tackled by:

- a. Incorporating gender, human rights and anti-corruption issues into project design;
- b. Including activities in workplan relating to gender, human rights and anti-corruption;
- c. Conducting and publicising more research highlighting the impact of illegal trafficking of waste and chemicals on local communities and vulnerable groups;
- d. Including gender sensitive awareness raising and outreach activities in the stakeholder engagement strategy and plan; and
- e. Further collaborating with regional and national stakeholders that have a keen focus on human rights and gender issues.