# 1. Project Data

	Summary project data				
GEF project ID		3374			
GEF Agency project ID		3127			
GEF Replenishment Phase		GEF-4			
Lead GEF Agency (inc	clude all for joint projects)	UNDP			
Project name		Stabilizing Rural Populations Through Improved Systems for Sustainable Land Management (SLM) and Local Governance Lands in Southern Madagascar			
Country/Countries		Madagascar			
Region		Africa			
Focal area		Land Degradation			
Operational Program or Strategic Priorities/Objectives		Land Degradation SP-1; SP-2			
Executing agencies involved		World Wildlife Foundation <sup>1</sup>	World Wildlife Foundation <sup>1</sup>		
NGOs/CBOs involvement		World Wildlife Foundation (lead executing agency); German International Cooperation and Development Agency (GIZ); European Union; Swiss RE Foundation			
Private sector involve	ement	Not given			
CEO Endorsement (F	SP) /Approval date (MSP)	September 1, 2009			
Effectiveness date / p	project start	July 5, 2010			
Expected date of project completion (at start)		January 1, 2012			
Actual date of project	t completion	December 31, 2014 <sup>2</sup>			
		Project Financing			
		At Endorsement (US \$M)	At Completion (US \$M)		
Project Preparation	GEF funding	.03	.03		
Grant	Co-financing	.01	Not given		
GEF Project Grant		.91	.91		
	IA own	.3	.2		
	Government	.27	.27		
Co-financing	Other multi- /bi-laterals <sup>3</sup>	4.63	4.75		
	Private sector				
	NGOs/CSOs				
Total GEF funding		.94	.94		
Total Co-financing		5.21	5.22		
Total project funding (GEF grant(s) + co-financing)		6.15	6.16		
		/aluation/review informatio	n		

<sup>&</sup>lt;sup>1</sup> The World Wildlife Foundation (WWF) and the Ministry of Environment, Forestry and Tourism were originally slated to jointly execute the project, however due to the political crisis in Madagascar in 2009, UNDP placed the project under the status of Special Development Situation and WWF became the sole executing agency.

<sup>&</sup>lt;sup>2</sup> UNDP terminated all project activities in December 2013, however the project was extended to 2014 in order to complete the terminal evaluation.

<sup>&</sup>lt;sup>3</sup> The TE does not disaggregate between NGOs/CSOs, and other multi/bi-laterals.

TE completion date	January 2015
Author of TE	Alexandre Borde
TER completion date	March 4, 2016
TER prepared by	Laura Nissley
TER peer review by (if GEF IEO review)	Molly Watts

## 2. Summary of Project Ratings

Criteria	Final PIR	IA Terminal Evaluation	IA Evaluation Office Review	GEF IEO Review
Project Outcomes	MU	MU		MU
Sustainability of Outcomes		MU		UA
M&E Design		S		MS
M&E Implementation		MS		MU
Quality of Implementation		S		MU
Quality of Execution		MU		U
Quality of the Terminal Evaluation Report				U

## 3. Project Objectives

#### 3.1 Global Environmental Objectives of the project:

The Project Document does not explicitly state the Global Environmental Objectives, however the goal is stated as follows: "The sustainable management of lands and resources in southern Madagascar provides a resilient base for the livelihoods and the economy of the arid South" (Section 2, pg. 1). The Project Document notes that unsustainable land use in southern Madagascar has led to high levels of forest fragmentation, soil erosion, and sedimentation in river valleys. This has in turn provoked flooding and destruction of estuaries, mangroves, and coral reefs, and risked livelihoods and the economy (Project Document Section 1, pg. 2).

#### 3.2 Development Objectives of the project:

The Development Objective of the project is "To enhance the capability of resource users to mainstream SLM [Sustainable Land Management] in development practice and policy at local and national levels for the mutual benefits of local livelihoods and global environment" (Project Document Section 2, pg. 1).

Expected programmatic outcomes<sup>4</sup> under this objective included:

<sup>&</sup>lt;sup>4</sup> The project design included a fifth non-programmatic outcome; *Project effectively implemented and achieves results within budget and timeframe*.

- Outcome 1: Replicable models of SLM are developed for selected communes that are representative of the major agro-ecological sub-regions in southern Madagascar, and these are promoted elsewhere in the region
- Outcome 2: Policy enabling environment: Local regulatory and policy enhancement with national implications, and
- Outcome 3: Institutions and individuals have the capacity to support and apply SLM at local, regional and national levels

3.3 Were there any **changes** in the Global Environmental Objectives, Development Objectives, or other activities during implementation?

The objectives and outcomes of the project did not formally change during implementation. However, the TE notes that amendments were made to the original project document, including the editing or deleting of activities, without the approval of the Project Steering Committee (pg. 30). In particular, it appears that activities related to dune stabilization, policy development, and regional and national capacity building, were largely abandoned. It should also be noted here that UNDP cancelled all project activities on December 31, 2013 due to the unsatisfactory performance of the project (TE pg. 28).

### 4. GEF IEO assessment of Outcomes and Sustainability

Please refer to the GEF Terminal Evaluation Review Guidelines for detail on the criteria for ratings.

Relevance can receive either a Satisfactory or Unsatisfactory rating. For Effectiveness and Cost efficiency, a six point rating scale is used (Highly Satisfactory to Highly Unsatisfactory), or Unable to Assess. Sustainability ratings are assessed on a four-point scale: Likely=no or negligible risk; Moderately Likely=low risk; Moderately Unlikely=substantial risks; Unlikely=high risk. In assessing a Sustainability rating please note if, and to what degree, sustainability of project outcomes is threatened by financial, sociopolitical, institutional/governance, or environmental factors.

Please justify ratings in the space below each box.

4.1 Relevance	Rating: Satisfactory
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The TE provides a rating of **Satisfactory** for project relevance, and this TER concurs. The project outcomes are consistent with the GEF-4 Land Degradation Focal Area, specifically Strategic Program 1, *Supporting sustainable agriculture and rangeland management*, and Strategic Program 2, *Supporting sustainable forest management in production landscapes*. The project outcomes are also consistent with Madagascar's priorities and plans for natural resource management, including the National Strategy for the Management of Risks and Catastrophes. Additionally, the project outcomes are consistent with Madagascar's international commitments as a signatory to the Convention on Biodiversity (CBD), the United Nations Framework Convention on Climate Change (UNFCCC), and the United Nations Convention on Combating Desertification (UNCCD) (Project Document, Section 4, pgs. 6-7).

The TE provides a rating of **Moderately Unsatisfactory** for project effectiveness, and this TER concurs. The project's objective of mainstreaming Sustainable Land Management (SLM) in development practice and policy at local and national levels was not achieved. Moderate progress was made toward creating replicable SLM models and building the capacity of individuals at the local level to apply SLM. However, the majority of project targets were not reached due to poor planning and execution, in addition to political challenges.

It should be noted here that the TE's analysis of project effectiveness is weak and contains significant gaps in evidence. Therefore, this TER relied heavily on the final 2014 Project Implementation Review (PIR) for evidence of completed outcomes.

A summary of the project's achievements, by programmatic outcome, is provided below:

- Outcome 1: Replicable models of SLM are developed for selected communes that are representative of the major agro-ecological sub-regions in southern Madagascar, and these are promoted elsewhere in the region:
  - Expected results under this outcome included: (1) models for sustainable agro-ecological and pastoral practices developed and applied in pilot areas, (2) cost-effective dune stabilization techniques perfected, (3) Commune Development Plans (PCDs) developed/revised to integrate best practices from the SLM model development, and (4) income-generating activities introduced/supported to increase economic activities at the commune level. By project end, moderate progress had been achieved under this outcome. Models for sustainable agroecological and pastoral practices were developed and tested in the pilot areas to varying degrees of success. The TE notes that the shortening of the project timeframe reduced the duration of the tests and affected their reliability and impact (pg. 34). Each of the five communes also identified three priority income-generating activities and developed business plans (2014 PIR pg. 28).

On the other hand, dune stabilization efforts were largely abandoned when it became clear that the littoral dunes could not be stabilized without significant funding and resources. A strategic plan was developed to stabilize smaller dunes and the Regional Department of Forestry (RDF) agreed to test the methods in two regions (2014 PIR pgs. 7-8). Additionally, the PCDs were not developed or revised in the five target communes, although land use maps were created which could influence the development of PCDs in the future (2014 PIR pg. 4).

 Outcome 2: Policy enabling environment: Local regulatory and policy enhancement with national implications:

Expected results under this outcome included: (1) development/revision of PCDs for pilot areas, mainstreaming SLM concerns and developing supporting legislation, <sup>5</sup> (2) direct linkages established between SLM governance in communes and PCD program funding and/or credit, (3) local regulations for Natural Resource Management (NRM) improved, and (4) formulation of Country Strategic Investment Framework (CSIF) that promotes up-scaling of SLM practices. By project end, very little had been achieved under this outcome. As mentioned above, PCDs were not developed or revised. A diagnostic assessment on local NRM was prepared, in addition to an analysis of the social norms associated NRM (2014 PIR pg. 22). The 2014 PIR notes that this outcome was significantly impacted by the political situation in Madagascar (pg. 23).

 Outcome 3: Institutions and individuals have the capacity to support and apply SLM at local, regional and national levels:

Expected results under this outcome included: (1) capacity building support for local farmers to apply SLM in four pilot communes and relevant training modules up-scaled to other areas, (2) capacity building programs developed for improved commune SLM governance, regional level stakeholders, and vocational training institutions, (3) knowledge sharing and promotion of SLM mainstreaming, and (4) extension package revised to include improved agriculture and livestock management, and capacity to deliver package improved. By project end, limited progress had been achieved under this outcome. Some groups in pilot areas received trainings in new land management practices, however there is no evidence that these efforts were scaled-up to other areas in Madagascar (TE pg. 8). Training and knowledge transfer structures were established in Ampanilhy and Androka, however the future of these Centers for Farmer Exchange is uncertain (TE pgs. 35-36; 29).

4.3 Efficiency	Rating: Unsatisfactory
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The TE provides a rating of **Moderately Unsatisfactory** for project efficiency, which this TER downgrades to **Unsatisfactory**. The project experienced significant delays at project start-up and during implementation. The Project Document was signed in September 2009, however project activities did not begin until July 2010, largely due to challenges recruiting and hiring a National Project Coordinator (TE pg. 28). However, the most significant delays resulted from the slow disbursement of funds during the first three years of the project. As the TE notes, project implementation followed the cropping calendar in Madagascar, which did not align with UNDP's administrative calendar. As a result, the

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<sup>&</sup>lt;sup>5</sup> It should be noted that this result is redundant, as it is already covered under Outcome 1.

project was unable to purchase the seeds it needed to test the sustainable agro-ecological models (TE pg. 28; 37).

The project received an extension until December 2014 in order to complete project activities. However, when it became clear that the project was underperforming and would not achieve its targets, UNDP and the Project Steering Committee decided to stop approving work plans, effectively ending project activities in December 2013 (TE pg. 28). The project technically remained open until the TE was completed in late 2014. Although the project was effectively canceled and many of the expected results were not achieved, the GEF budget was fully disbursed largely due to excessive operating costs (TE pg. 38).

4.4 Sustainability	Rating: Unable to Assess
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The TE provides a rating of **Moderately Unlikely** for project sustainability. However, the TE does not provide enough information to adequately assess project sustainability in terms of financial resources, sociopolitical risks, institutional frameworks and governance, or environmental risks. The TE does note that after the GEF project was canceled, some of the activities were continued under the UNDP Sustainable Livelihoods and Poverty Reduction Project (MSDLCP) (TE pgs. 28-29).

### 5. Processes and factors affecting attainment of project outcomes

5.1 Co-financing. To what extent was the reported co-financing essential to the achievement of GEF objectives? If there was a difference in the level of expected co-financing and actual co-financing, then what were the reasons for it? Did the extent of materialization of co-financing affect project's outcomes and/or sustainability? If so, in what ways and through what causal linkages?

Actual co-financing was slightly higher than expected, at a total of \$5.22 million (compared to the expected \$5.21 million). Additional co-financing came from other bi-lateral donors, such as the Swiss Re Foundation, which contributed funding to continue SLM activities in Maniry. Additionally, UNDP committed funds from the Sustainable Livelihoods and Poverty Reduction Project (MSDLCP) project to assist with closing down the project and taking over activities in Marolinta (TE pg. 30).

5.2 Project extensions and/or delays. If there were delays in project implementation and completion, then what were the reasons for it? Did the delay affect the project's outcomes and/or sustainability? If so, in what ways and through what causal linkages?

The project experienced moderate delays at start-up due to challenges hiring a national project coordinator. The project experienced more significant delays during implementation due to the slow disbursement of funds from UNDP. As a result, the project was unable to purchase the seeds it needed to test the sustainable agro-ecological models. The project was granted an extension until December

2014 in order to complete activities. However, the project was unable to gain momentum, and UNDP canceled the project due to under performance. The project remained open until the TE was completed.

5.3 Country ownership. Assess the extent to which country ownership has affected project outcomes and sustainability? Describe the ways in which it affected outcomes and sustainability, highlighting the causal links:

Country ownership over the project was moderately low. The Ministry of Environment, Forestry and Tourism was originally supposed to jointly execute the project with the World Wildlife Foundation (WWF). However due to the political crisis in Madagascar in 2009, UNDP placed the project under the status of Special Development Situation, and WWF became the sole executing agency. The TE notes that this arrangement affected the project's ability to influence national policies regarding land degradation (Outcome 2) (TE pg. 8). The Ministry of Environment, Forestry and Tourism did play a limited role in monitoring the project by participating in the Project Steering Committee. The TE also notes that local government offices and community groups were involved in project activities, such as the development and testing of models for sustainable agro-ecological and pastoral practices (pg. 38).

### 6. Assessment of project's Monitoring and Evaluation system

Ratings are assessed on a six point scale: Highly Satisfactory=no shortcomings in this M&E component; Satisfactory=minor shortcomings in this M&E component; Moderately Satisfactory=moderate shortcomings in this M&E component; Moderately Unsatisfactory=significant shortcomings in this M&E component; Unsatisfactory=major shortcomings in this M&E component; Highly Unsatisfactory=there were no project M&E systems.

Please justify ratings in the space below each box.

6.1 M&E Design at entry	Rating: Moderately Satisfactory
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The TE provides a rating of **Satisfactory** for M&E design, which this TER downgrades to **Moderately Satisfactory**. The results framework provided in the Project Document is logical, and specifies indicators for the objective and outcome levels. The results framework does not, however, include indicators at the output level. Additionally, the indicators are of mixed quality. For example, it is unclear what constitutes a "viable model" under Indicator 1.1, *Viable models of sustainable agriculture are developed for the white littoral sands AEZ*, 6 the Red Soils AEZ and the Crystalline AEZ. Other indicators were overly ambitious, such as Indicator 1.5; At least 80% of active littoral dunes that were active at project startup in the two pilot communes of the White Littoral Sands AEZ will have been stabilized by end of project.

The Project Document does include a general M&E plan outlining key M&E activities (inception workshop, performance indicator monitoring, periodic and annual reviews, status reports, and a midterm and final evaluation), responsible parties, and associated budget and timeframe. A total budget

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<sup>&</sup>lt;sup>6</sup> Agro-Ecological Zone

of \$.06 million is provided for M&E activities, although the Project Document does indicate that some of this cost was covered under other budget line items (Section 1, pg. 18).

6.2 M&E Implementation	Rating: Moderately Unsatisfactory
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The TE provides a rating of **Moderately Satisfactory** for M&E implementation, which this TER downgrades to **Moderately Unsatisfactory**. The performance indicators were reviewed during the inception phase of the project (2010-2011), and new and revised indicators were incorporated into the Project Document in 2012. The TE notes however, that the revision of the indicators had a minor influence on the implementation of the project (pg. 20). Moreover, problematic indicators remained in the results framework (i.e. Indicator 1.1), and some of the new indicators could not be reliably measured (i.e. Indicator 1.7, *Maintenance of forest cover in two communes*) (2014 PIR, pg. 17). Additionally, the Midterm Evaluation was continually postponed until it was eventually canceled in 2013 (TE pg. 33). It should be noted however, that the annual project reports accurately reflected the shortcomings in the project's implementation and contained well-justified ratings.

### 7. Assessment of project implementation and execution

Quality of Implementation includes the quality of project design, as well as the quality of supervision and assistance provided by implementing agency(s) to execution agencies throughout project implementation. Quality of Execution covers the effectiveness of the executing agency(s) in performing its roles and responsibilities. In both instances, the focus is upon factors that are largely within the control of the respective implementing and executing agency(s). A six point rating scale is used (Highly Satisfactory to Highly Unsatisfactory), or Unable to Assess.

Please justify ratings in the space below each box.

7.1 Quality of Project Implementation	Rating: Moderately Unsatisfactory
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The TE provides a rating of **Satisfactory** for quality of project implementation, which this TER downgrades to **Moderately Unsatisfactory**. As the implementing agency, UNDP was responsible for the project's design, which was ambitious given the allotted time and resources (TE pg. 33). The project design also included redundancies, as the development of Commune Development Plans (PCDs) was covered under both Outcome 1 and Outcome 2. As noted above, the indicators provided in the results framework were of mixed quality, diminishing its effectiveness as a monitoring and evaluation tool. The project also suffered from chronic delays in implementation, largely due to the slow disbursement of

funds during the first three years of the project. The project was unable to develop momentum, and UNDP eventually terminated all project activities in December 2013 (TE pg. 28). Although the TE notes that UNDP's supervision of the project was successful, a review of the annual project reports indicates that neither the UNDP Regional Technical Advisor or the UNDP Country Office satisfactorily addressed the project's underperformance.

7.2 Quality of Project Execution	Rating: Unsatisfactory
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The TE provides a rating of **Moderately Unsatisfactory** for project implementation, which this TER downgrades to **Unsatisfactory**. The executing agency for the project was the World Wildlife Fund (WWF). Originally, the Ministry of Environment, Forestry and Tourism was supposed to jointly execute the project with the WWF, however due to the political crisis in Madagascar in 2009, UNDP placed the project under the status of Special Development Situation and WWF became the sole executing agency. The TE does note that the Ministry of Environment, Forestry and Tourism participated in the Project Steering Committee, which was responsible for monitoring the overall progress of the project (pg. 26). The WWF regional office in Tulear was responsible for supervising the administrative and financial arrangements of the project, and the Project Management Unit (PMU), based in Ampanihy, was responsible for executing project activities.

The project experienced delays during start-up due to challenges hiring a national project coordinator. The first national coordinator resigned shortly after being hired, and the replacement coordinator refused to live in Ampanihy, where the PMU was based. The TE notes that the national coordinator's travel costs contributed to the excessive operating costs of the project (pg. 26). Moreover, the project's budget was not used efficiently, as all funds were spent long before the project's outcomes were achieved. The project was ultimately canceled in December 2013 due to underperformance.

#### 8. Assessment of Project Impacts

Note - In instances where information on any impact related topic is not provided in the terminal evaluations, the reviewer should indicate in the relevant sections below that this is indeed the case and identify the information gaps. When providing information on topics related to impact, please cite the page number of the terminal evaluation from where the information is sourced.

8.1 Environmental Change. Describe the changes in environmental stress and environmental status that occurred by the end of the project. Include both quantitative and qualitative changes documented, sources of information for these changes, and how project activities contributed to or hindered these changes. Also include how contextual factors have contributed to or hindered these changes.

The TE does not cite any environmental changes that occurred by the end of the project.

8.2 Socioeconomic change. Describe any changes in human well-being (income, education, health, community relationships, etc.) that occurred by the end of the project. Include both quantitative and qualitative changes documented, sources of information for these changes, and how project activities contributed to or hindered these changes. Also include how contextual factors have contributed to or hindered these changes.

The TE notes that at the Marolinta pilot site, a group of goat farmers increased their income by 40% and tripled their livestock by the end of the project. This increase in income was due to the introduction of new practices, such as earrings, drugs, and separate enclosures for sick animals (TE pg. 36).

8.3 Capacity and governance changes. Describe notable changes in capacities and governance that can lead to large-scale action (both mass and legislative) bringing about positive environmental change. "Capacities" include awareness, knowledge, skills, infrastructure, and environmental monitoring systems, among others. "Governance" refers to decision-making processes, structures and systems, including access to and use of information, and thus would include laws, administrative bodies, trust-building and conflict resolution processes, information-sharing systems, etc. Indicate how project activities contributed to/ hindered these changes, as well as how contextual factors have influenced these changes.

#### a) Capacities

The TE notes that Centers for Farmer Exchange were established in two target communes, Ampanilhy and Androka. If the Centers continue to be supported, they could serve as training and knowledge transfer structures for farmers in the future (TE pgs. 35-36; 29). Some groups in pilot areas also received trainings in new land management practices and income generating activities, such as *basket-compost*, silkworm cultivation, and drip-feed irrigation (TE pgs. 35-36; 8).

#### b) Governance

The TE does not cite any changes in governance that occurred by the end of the project.

8.4 Unintended impacts. Describe any impacts not targeted by the project, whether positive or negative, affecting either ecological or social aspects. Indicate the factors that contributed to these unintended impacts occurring.

The TE does not cite any unintended impacts that occurred by the end of the project.

8.5 Adoption of GEF initiatives at scale. Identify any initiatives (e.g. technologies, approaches, financing instruments, implementing bodies, legal frameworks, information systems) that have been mainstreamed, replicated and/or scaled up by government and other stakeholders by project end. Include the extent to which this broader adoption has taken place, e.g. if plans and resources have been established but no actual adoption has taken place, or if market change and large-scale environmental benefits have begun to occur. Indicate how project activities and other contextual factors contributed to these taking place. If broader adoption has not taken place as expected, indicate which factors (both project-related and contextual) have hindered this from happening.

The TE does not cite any GEF initiatives that were adopted at scale by the end of the project.

#### 9. Lessons and recommendations

9.1 Briefly describe the key lessons, good practices, or approaches mentioned in the terminal evaluation report that could have application for other GEF projects.

The TE groups the following lessons learned and recommendations together (pg. 41):

- First, the positive results of the project are to be valued and transmitted. The CEP [Centers for Farmer Exchange] and micro-irrigation systems, planting seedlings and cuttings, and other hardware and infrastructure put in place by the project must be supported by appropriate regional and local partners. The transfer must be formal, and provide adequate budget for equipment maintenance. WWF [World Wildlife Fund], present on the spot, could be one of the vectors of this transfer of experience. Writing a capitalization document is in progress for this purpose. It will be based on this report, detailing all project elements that must be maintained and made more sustainable.
- Cooperation between UNDP and regional and national authorities should be continued and strengthened on themes similar to those covered by the SLM project. Partnerships with research organizations and other technical partners must be strengthened in future projects. More generally, coordination with donors and other development and conservation actors in southern Madagascar must be improved. The appraiser will soon receive a study report on the cactus sector in Ampanihy pledged by the General Secretary of the Atsimo-Andrefana Region. It is important to identify areas of intervention with regional partners to support rural populations in the South who are among the poorest of Madagascar.
- Future projects should take into account the risk related to the lack of availability of experts and trainers in the field. Local capacity building should be a priority for UNDP. [SEP]
- As part of the next program cycle, it is recommended to focus transversely on the themes of water, market access and promotion of regional products, adaptation to climate change, promotion of crafts, related to rural development and agriculture, especially livestock.

9.2 Briefly describe the recommendations given in the terminal evaluation.

Please see above.

# 10. Quality of the Terminal Evaluation Report

A six point rating scale is used for each sub-criteria and overall rating of the terminal evaluation report (Highly Satisfactory to Highly Unsatisfactory)

Criteria	GEF IEO comments	Rating
To what extent does the report contain an assessment of relevant outcomes and impacts of the project and the achievement of the objectives?	The report's assessment of project outcomes and impacts is not comprehensive, systematic or detailed. What limited analysis is presented is focused solely on Outcome 1.	U
To what extent is the report internally consistent, the evidence presented complete and convincing, and ratings well substantiated?	The report does not present complete and convincing evidence to substantiate its ratings. There is no evidence presented to assess whether the project's targets were achieved or not.	U
To what extent does the report properly assess project sustainability and/or project exit strategy?	The report provides ratings for the various dimensions of sustainability without any justification.	ни
To what extent are the lessons learned supported by the evidence presented and are they comprehensive?	The lessons learned and recommendations are limited in scope and presented together which is confusing. They are however, consistent with the assessment provided in the TE.	ми
Does the report include the actual project costs (total and per activity) and actual co-financing used?	The report includes the actual project costs are provided but are not disaggregated by activity. Co-financing is provided, but not disaggregated by actor (NGOs, private sector, and other bilateral donors are grouped together)	MS
Assess the quality of the report's evaluation of project M&E systems:	The report does not provide any assessment of the project's M&E design. The report's assessment of M&E implementation was restricted to the revision of the performance indicators.	ми
Overall TE Rating		U

# 11. Note any additional sources of information used in the preparation of the terminal evaluation report (excluding PIRs, TEs, and PADs).