

## 1. Project Data

Summary project data			
GEF project ID		3986	
GEF Agency project ID		606409	
GEF Replenishment Phase		GEF-4	
Lead GEF Agency (include all for joint projects)		FAO	
Project name		Disposal of POPs Wastes and Obsolete Pesticides	
Country/Countries		Mozambique	
Region		AFR	
Focal area		POPs	
Operational Program or Strategic Priorities/Objectives		POPs SP-1; SP-3	
Executing agencies involved		Ministry of Agriculture; Ministry for Coordination of Environmental Affairs	
NGOs/CBOs involvement		Not available	
Private sector involvement		Not available	
CEO Endorsement (FSP) /Approval date (MSP)		December 23, 2010	
Effectiveness date / project start		July 1, 2011	
Expected date of project completion (at start)		August 2014	
Actual date of project completion		September 2019	
Project Financing			
		At Endorsement (US \$M)	At Completion (US \$M)
Project Preparation Grant	GEF funding	.05	.05
	Co-financing	.05	UA
GEF Project Grant		1.95	.91
Co-financing	IA own	.05	.02
	Government	2.17	1.5
	Other multi- /bi-laterals	3.86	3.86
	Private sector		
	NGOs/CSOs		
Total GEF funding		2	.96
Total Co-financing		6.13	5.38
Total project funding (GEF grant(s) + co-financing)		8.13	6.34
Terminal evaluation/review information			
TE completion date		2019	
Author of TE		Dr. Boru Douthwaite and Dr. Zibusiso Sibanda	
TER completion date		1/21/2020	
TER prepared by		Laura Nissley	
TER peer review by (if GEF IEO review)		Molly Sohn	

## 2. Summary of Project Ratings

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

## 3. Project Objectives

### 3.1 Global Environmental Objectives of the project:

The project's Global Environmental Objective was to "Eliminate risks from POPs [Persistent Organic Pollutants] and obsolete pesticides in Mozambique through the use of sound environmental management methods to dispose of existing stocks and contaminated soils and prevent further accumulation of POPs and obsolete pesticides" (TE pg. 21).

### 3.2 Development Objectives of the project:

The project's Development Objective was to "Reduce the risks to public health and the environment posed by poor pesticide management and obsolete pesticide waste" (Project Document pg. 16).

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

There were no changes to the project's objectives during implementation, however there were substantial changes to the project's activities. The TE indicates that all activities related to the treatment of contaminated containers were canceled due to high levels of contamination. The decision was made to export the contaminated containers for disposal by high temperature incineration together with obsolete pesticide waste, however this had not been achieved by project end (TE pgs. 32-33). In order to fund the disposal of containers and waste, plans to develop a sustainable system for future container management were cancelled (TE pgs. 34-35).

## 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: <b>Satisfactory</b>
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The TE provides a rating of **Highly Satisfactory** for project relevance. This TER, which uses a different scale, provides a rating of **Satisfactory**. The TE indicates that the project addressed the priority areas of Mozambique's Stockholm Convention National Implementation Plan (NIP), including strengthening legal and institutional frameworks for managing Persistent Organic Pollutants (POPs); enhancing transfer of appropriate technology for control of POPs releases; improving public information, awareness and education; and establishing a monitoring system for POPs (pg. 27). The project's strategy is therefore consistent with GEF-4 POPs Strategic Program 1: *Strengthening Capacities for NIPs Implementation*, as well as *Strategic Program 3: Partnering in the Demonstration of Feasible, Innovative Technologies and Best Practices for POPs Reduction and Substitution*. Additionally, the project's outcomes are consistent with Mozambique's policies and frameworks relating to POPs, including the Environmental Management Law (2002), which provides for "the prevention and management of risks of pollution to the environment, including disposal of obsolete pesticide stocks, development of regulations to control trade of POPs chemicals and the promotion of safer pest management alternatives" (TE pg. 28).

4.2 Effectiveness	Rating: <b>Moderately Unsatisfactory</b>
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The TE provides a rating of **Moderately Satisfactory** for project effectiveness, which this TER downgrades to **Moderately Unsatisfactory**. The project was designed to dispose of existing stocks and contaminated soils and prevent further accumulation of POPs and obsolete pesticides. The TE indicates that while the project was successful in safeguarding POPs, pesticide waste, and contaminated containers, it had not disposed of safeguarded materials by the time of the TE in November 2018. The project was also unable to establish a sustainable system for container management or install a stock management system. Although guidelines for pesticide life-cycle management were drafted, as well as a waste management plan, they had not been adopted by the government by the time of the TE. As a result, inspectors and customs officials could not be trained.

The project's achievements, by component and outcome, are outlined below:

#### **Component 1: Disposal of buried pesticides and contaminated sites**

*Outcome 1.1: The containment and removal of buried pesticides at prioritized high-risk locations preventing continuing environmental contamination and public health risks*

Expected results under this outcome included: (1) Site survey report assessing all contaminated sites; (2) Site-specific environmental management plans (EMPs) and remediation plans; and (3) Safeguarding and disposal contract for implementation of EMPs resulting in the excavation of buried pesticides and remediation of selected high-risk contaminated sites. By project end, detailed environmental assessments were carried out and EMPs were developed for high-risk sites. The final quantity of

contaminated soil that was to be disposed of was 783 tonnes, much higher than the estimated 100 tonnes. As a result, funds had to be allocated away from developing a sustainable system for container management (Outcome 2.1). However, the TE indicates that very limited progress had been made with regard to excavating buried pesticides and remediating contaminated sites by the time of the TE in November 2018. The TE notes that the project did meet its target for safeguarding obsolete pesticides (pgs. 28-32).

*Outcome 1.2: The removal and safe treatment of old pesticide containers*

Expected results under this outcome included: (1) Detailed inventory and risk assessment of all remaining obsolete pesticides and contaminated containers in Mozambique; (2) Selection and procurement of container decontamination and crushing/fragmentation equipment; (3) Recycling equipment operated and contaminated containers treated; and (4) Final recycling or disposal of decontaminated containers. The TE indicates that all activities related to the treatment of contaminated containers were canceled due to the high level of contamination (the pesticides had solidified into the plastic) which made it impossible to recycle or dispose of the containers locally. The project team made the decision to export the contaminated containers for disposal by high temperature incineration together with obsolete pesticide waste (TE pgs. 32-33).

**Component 2: Improved pesticide life cycle management**

*Outcome 2.1: The development of a sustainable system for container management in collaboration with pesticide industry*

Expected results under this outcome included: (1) a feasibility study on options for sustainable container management in collaboration with national pesticide industry and other stakeholders; (2) implementing a strategy for treating existing pesticide containers; and (3) developing a sustainable container management strategy. By project end, the feasibility study had been completed, however plans to develop a sustainable system for future container management were cancelled so that funds could be used for disposal (Outcome 1.1) (TE pgs. 34-35).

*Outcome 2.2: Institutional capacity will be developed and national pesticide management policy will be strengthened to ensure the risk to the environmental and public health from obsolete pesticides and associated wastes is minimized in the future*

Expected results under this outcome included: (1) National technical guidelines on specific aspects of the pesticide lifecycle (registration; storage; transport; and container handling) developed; and (2) National waste management plan expanded to include pesticide waste management. By project end, eight guidelines for pesticide life-cycle management and a draft waste management plan were developed. Adoption of the guidelines and waste management plan was put on hold while Mozambique waited for regional guidelines to be developed (TE pg. 33).

*Outcome 2.3: Improved management of pesticides imported into Mozambique for agricultural and public health uses through all stages of the pesticide lifecycle*

Expected results under this outcome included: (1) Installation of Pesticide Stock Management System (PSMS) as primary repository for pesticide registrations and tracking of pesticide distribution; and (2) Four pesticide inspectors and four customs officials trained on identification unregistered and/or illegal

products. The TE indicates that the PSMS was not institutionalized due to poor internet access and because the system was still under review by FAO, and an alternative stock management system was not adopted (TE pg. 36). Additionally, the training of inspectors and customs officials was not achieved because the new pesticide management guidelines were not finalized. The TE does indicate that 142 government staff and 127 farmers were trained in safe pesticide use and pesticide management (pg. 35).

4.3 <b>Efficiency</b>	Rating: <b>Moderately Unsatisfactory</b>
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The TE provides a rating of **Moderately Satisfactory** for project efficiency, which this TER downgrades to **Moderately Unsatisfactory**. The project end date was extended five years in order to complete project activities, from August 2014 to September 2019. The project experienced a number of delays related to the disposal of POPs, pesticide waste, and contaminated containers, including procurement and tendering issues, as well as delays in implementing the Unilateral Trust Fund (UTF) project which was supposed to run parallel to the GEF project (TE pg. 42). Additionally, the TE indicates that field work was difficult due to security issues, which required road detours through Zimbabwe (pg. 41). The TE also provides some evidence that the project was not cost-effective. The project relied solely on co-financing from the UTF project from 2012 until 2016 and did not draw on GEF funds during this time. The TE suggests that the project found it easier to spend UTF funding because the FAO Country Office was the budget holder for those funds, as opposed to the GEF grant (pg. 43). At the time of the TE in November 2018, \$1.04 million, or approximately 53% of the GEF budget, had not been spent. The TE also indicates that “more emphasis and funding should have been given to working [on] improving the management of the pesticide lifecycle,” as opposed to redirecting funds toward disposal, which was not achieved by the time of the TE (pg. 43).

4.4 <b>Sustainability</b>	Rating: <b>Moderately Unlikely</b>
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The TE provides a rating of **Moderately Likely** for project sustainability, which this TER downgrades to **Moderately Unlikely**.

#### **Financial Resources**

The TE provides a rating of **Moderately Likely** for the sustainability of financial resources, which this TER downgrades to **Moderately Unlikely**. At the time of the TE in November 2018, it was unclear whether the contract for the overseas disposal of existing contaminated containers would be executed. Overall, the TE indicates that significant government and donor support will be needed to achieve project outcomes, and that continued lobbying will be difficult after the termination of the project (pg. 65).

## Sociopolitical

The TE provides a rating of **Moderately Likely** for sociopolitical sustainability, which this TER downgrades to **Moderately Unlikely**. The TE indicates that government ownership over the project was weak, which could affect follow-up actions. The TE notes this was in part due to the National Project Coordinator being based out of FAO rather than the Pesticide Registrar's Office. As a result, the project came to be seen as a FAO project (TE pg. 38). Additionally, improving the management of the pesticide lifecycle was not a priority of the government, which was necessary for the sustainability of project outcomes (pg. 65).

## Institutional Frameworks and Governance

The TE provides a rating of **Moderately Likely** for the sustainability of institutional frameworks and governance, which this TER downgrades to **Moderately Unlikely**. Guidelines for pesticide life-cycle management and a waste management plan had not been adopted by project end, as the decision was made to wait for regional guidelines to be developed (TE pg. 33). Additionally, the pesticide management system was not institutionalized, as its design was impractical for the country context (TE pg. 51).

## Environmental

The TE provides a rating of **Moderately Likely** for environmental sustainability. This TER downgrades this rating to **Unlikely**. The TE indicates that the project has had "limited success in establishing systems to reduce future contamination of the environment from pesticides and associated waste." As a result, the TE notes that "accumulation of obsolete pesticides and contamination of the environment will likely continue" (pg. 65).

## 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 (\$5.38 million) was less than expected (\$6.13 million). The bulk of the project's co-financing, \$3.84 million, came from the Government of Japan through the Unilateral Trust Fund (UTF). The UTF funded the safeguarding and disposal of obsolete pesticides under Component 1 of the project. The TE also indicates that the project relied solely on co-financing from the UTF from 2012 until 2016 and did not draw on GEF funds during this time because it was "administratively easier to do so." The Midterm Evaluation (2015) and TE were critical of this arrangement, as it led to delays in the implementation of project activities (pg. 39). Additionally, results related to the disposal of POPs, pesticide waste, and contaminated containers, had not been achieved by the time of the TE.

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 substantial delays in implementation due to procurement and tendering issues; logistical issues related to security concerns; as well as delays with the UTF (TE pgs. 41-43). As a result, the project received five no-cost extensions; pushing back the project end date from August 2014 until September 2019. Despite these extensions, the project was unable to achieve its objectives by the time of the TE in November 2018.

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:

The TE indicates that government ownership over the project was weaker for this GEF project when compared to earlier phases (2003 to 2008). The TE notes that in earlier phases, the National Project Coordinator was based out of the Pesticide Registrar's Office, directly linking the Ministry of Agriculture and Food Security (MASA) to the project. Under this GEF project, the NPC was based out of FAO, resulting in the project being seen solely as a FAO project. The TE indicates that this arrangement threatens the sociopolitical sustainability of the project (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: <b>Moderately Unsatisfactory</b>
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The TE provides a rating of **Satisfactory** for M&E design at entry, which this TER downgrades to **Moderately Unsatisfactory**. The project's results framework is logical and hierarchical, however there were no outputs or output-level indicators included. Additionally, some of the indicators provided at the objective and outcome-levels are very similar to the outputs listed in the Project Document. For example, Output 2.3.1: *Installation of FAO Pesticide Stock Management System (PSMS) as primary repository of data for pesticide registrations and tracking of pesticide distribution in the country*, is almost identical to the indicator: *PSMS installed and operational in MINAG and all registered pesticides loaded into the system*. In other words, some of the indicators provided are results statements rather than SMART (specific, measurable, achievable, relevant, and timely) indicators. The Project Document does include a detailed M&E Plan, outlining M&E activities, responsible parties, timeframe, and budget. The TE notes that while the M&E plan was appropriate for the project, the "proposed number of reports

and short reporting periods was originally impractical” (pg. 65). In particular, the TE indicates that budget provided for M&E, \$60,000, was unrealistic given the level of reporting (pg. 44).

6.2 M&E Implementation	Rating: <b>Moderately Unsatisfactory</b>
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The TE provides a rating of **Moderately Satisfactory** for M&E implementation, which this TER downgrades to **Moderately Unsatisfactory**. The Project Implementation Reports (PIRs) are detailed and clear, however there are significant gaps in the project’s results framework which limit its effectiveness as a M&E tool (i.e. the lack of outputs and output-level indicators). The TE indicates that the project sub-contracted an NGO to establish a baseline, however the report generated by the NGO “focused on the problems of pesticide use in Mozambique rather than establishing a baseline that would help understand and quantify the impact of the project” (pg. 42). The TE also notes that while a Midterm Review was conducted, the project team did not respond to its recommendations. Additionally, the TE notes that the project failed to regularly report on co-financing, as well as lessons learned and best practice (pg. 45).

## 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: <b>Moderately Unsatisfactory</b>
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The TE provides a rating of **Moderately Unsatisfactory** for quality of project implementation, and this TER concurs. The implementing agency for the project was the United Nations Food and Agriculture Organization (FAO). The project did not achieve its objective by the time of the TE, despite receiving five no-cost extensions. The TE indicates a number of shortcomings which contributed to these delays, including a lack of support from the Lead Technical Unit (LTU) and the failure to utilize GEF funding for three years. In particular, the disposal of contaminated soil was significantly delayed due to poor communication between FAO, the Ministry of Agriculture, and the authorities in charge of the landfill



(TE pg. 42). The TE also indicates that the last backstopping mission by the LTU was in 2014, and that the project had been left to run with very few “checks” (pg. 43). Additionally, the TE notes that the decision to move the National Project Coordinator from the Pesticide Registrar’s Office to FAO reduced government ownership over the project (pg. 64).

7.2 Quality of Project Execution	Rating: <b>Moderately Satisfactory</b>
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The TE provides a rating of **Satisfactory** for the quality of project execution, which this TER downgrades to **Moderately Satisfactory**. The executing agency was the Pesticide Risk Reduction Group in the Plant Production and Protection Division (AGP) at FAO. Although the Ministry of Agriculture and Food Security (MASA) provided the office for Project Management Unit (PMU), the National Project Coordinator was employed by FAO. Overall, the TE notes that the PMU executed the project activities diligently despite difficult security conditions (pg. 64). The TE also notes that the Project Steering Committee (PSC) provided guidance and support to the project until 2015 when project funds were reallocated to disposal (Component 1). The TE indicates that the PSC decided the project had not done enough to warrant another meeting beyond 2015 (pg. 37).

The Project Implementation Reports (PIRs) were detailed and submitted on time, and an M&E system was operational, despite weaknesses in the project’s results framework. The TE does note however, that the project failed to regularly report on co-financing, as well as lessons learned and best practice (pg. 45).

## 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 indicates that an estimated 190 tonnes of obsolete pesticides were successfully safeguarded by the time of the TE (pg. 31).

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 does not indicate any socioeconomic impacts that occurred by the time of the TE.

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 indicates that the capacity of the project team to investigate contaminated sites and safeguard obsolete pesticides increased throughout the life of the project. Additionally, the project provided training in safe pesticide use and pesticide management to 142 government staff (including extension workers and plant protection officers) and 127 farmers (TE pg. 35).

b) Governance

The project drafted eight guidelines for pesticide life-cycle management and a waste management plan, however they had not been adopted by the time of the TE (TE pg. 33).

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 indicate any positive unintended impacts that occurred by project end. However, it does indicate that “stocks of a rodenticide from Lichinga Hospital...had been disposed of by burning. The project team was not able to establish where the rodenticide was burned, and it is possible that this may have resulted in the creation of another contaminated site” (pg. 31). The TE does not indicate why or how this potentially negative impact occurred.

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 indicate any GEF initiatives that were adopted at scale.

## **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 indicates that it developed a “lessons learned brief,” however this TER did not have access to it.

9.2 Briefly describe the recommendations given in the terminal evaluation.

The TE provides the following recommendations (pgs. viii-ix):

1. FAO and the PSC should continue to keep the issue of risk from pesticides as a government priority and should lobby for continued efforts to reduce risk from pesticides in Mozambique;
2. FAO and the PSC should ensure that Project activities are completed including remediation of highly contaminated sites, establishment of a sustainable system for managing empty pesticide containers, and establishment of a national pesticide stock management system;
3. FAO should facilitate completion of processes necessary for adoption of harmonized pesticide regulations by the Southern Africa Development Community (SADC);
4. FAO and GEF should ensure gender mainstreaming and inclusion of social and environmental safeguards in future projects;
5. The PSC should ensure that efforts are made to sustain capacity developed for safeguarding obsolete pesticides; and
6. GEF and FAO should ensure that in future projects budget for maintaining activities to reduce future risk from pesticides is not reallocated to other activities.

## 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 assessment of project outcomes was adequate, although it would have been helpful to have access to the output analysis annex (which could not be accessed on FAO's website).	<b>MS</b>
To what extent is the report internally consistent, the evidence presented complete and convincing, and ratings well substantiated?	The ratings provided are moderately inflated when compared to the evidence presented.	<b>MS</b>
To what extent does the report properly assess project sustainability and/or project exit strategy?	The sustainability section of the report was weak as not enough evidence was provided to justify ratings.	<b>MU</b>
To what extent are the lessons learned supported by the evidence presented and are they comprehensive?	This TER did not have access to the "lessons learned brief" prepared by the TE (it was not accessible on FAO's website and should have been included with the TE)	<b>U</b>
Does the report include the actual project costs (total and per activity) and actual co-financing used?	The report includes co-financing information, but there are gaps in the actual project costs.	<b>MS</b>
Assess the quality of the report's evaluation of project M&E systems:	The assessment of the project M&E systems did not include an analysis of the project's results framework.	<b>MS</b>
<b>Overall TE Rating</b>		<b>MS</b>

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