

Terminal Evaluation Review form, GEF Independent Evaluation Office, APR 2017

1. Project Data

Summary project data			
GEF project ID		5323	
GEF Agency project ID		120097	
GEF Replenishment Phase		GEF-5	
Lead GEF Agency (include all for joint projects)		UNIDO	
Project name		Reduce exposure of mercury to human health and the environment by promoting sound chemical management in Mongolia	
Country/Countries		Mongolia	
Region		North-East Asia	
Focal area		POPs	
Operational Program or Strategic Priorities/Objectives		CHEM-3 - pilot sound chemicals management and mercury reduction	
Executing agencies involved		Ministry of Nature and Green Development	
NGOs/CBOs involvement		None	
Private sector involvement		Mine Reclamation Corporation (MIRECO)	
CEO Endorsement (FSP) / Approval date (MSP)		June, 2013	
Effectiveness date / project start		July, 2013	
Expected date of project completion (at start)		July, 2015	
Actual date of project completion		December, 2016	
Project Financing			
		At Endorsement (US \$M)	At Completion (US \$M)
Project Preparation Grant	GEF funding		
	Co-financing		
GEF Project Grant		0.6	0.57 (disbursement till Sept, 2016)
Co-financing	IA own	0.05	0.05
	Government	1.43	n/a
	Other multi- /bi-laterals		
	Private sector	0.08	0.08
	NGOs/CSOs		
Total GEF funding		0.6	0.57 (disbursement till Sept, 2016)
Total Co-financing		1.56	1.56
Total project funding (GEF grant(s) + co-financing)		2.16	2.13
Terminal evaluation/review information			
TE completion date		August, 2017	
Author of TE		UNIDO	
TER completion date		April, 2018	
TER prepared by		Ritu Kanotra	
TER peer review by (if GEF IEO review)		Molly Watts Sohn	

2. Summary of Project Ratings

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

3. Project Objectives

3.1 Global Environmental Objectives of the project:

According to the Project Document (PD), the Global Environmental Objectives of the project is to ensure the elimination of mercury in the project site through remediation technology and waste management systems, contributing to the global reduction of mercury load in the environment. Enabling interventions in upstream Mongolia are not only expected to reduce local risks to ecosystem and human health but also deliver global benefits and reduce the potential release of mercury into international waters.

3.2 Development Objectives of the project:

According to the Project Document (PD), the Development Objective of the project is to reduce exposure of mercury to human health and the environment in Mongolia. More specifically, the project sought to strengthen national and local capacity to effectively manage and reduce mercury emissions. In that respect, the following three outcomes were planned to be achieved through the project:

Outcome 1: Establishing a regulatory framework and national guidelines for environmentally sound management of mercury containing waste.

1.1 Draft national guidelines and supporting regulatory frameworks developed and adopted for the environmentally sound management of mercury containing waste

Outcome 2: Developing capacity for the implementation of remediation and stabilization techniques in mercury hot-spot areas through demonstration activities at the pilot scale.

2.1 Pilot demonstration of sound mercury remediation technique at the Boroo river site

Outcome 3: Disseminating information and raising awareness through campaigns on mercury health and environment risk reduction.

3.1 Publication/training material developed, and workshop/campaign conducted

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

There were no changes in the Global Environmental and Development Objectives. But, the project made two changes. First, the result obtained from Mireco study indicated low level mercury contamination at the Boroo spill site. As a result, the proposal to use one of the remediation techniques for demonstration at the Boroo site was not undertaken. Instead two techniques successfully tested at laboratory scale were demonstrated at the site. Second, on the request from the Government of Mongolia and project stakeholders, Project Steering Committee (PSC) approved construction of an interim storage facility (that cost USD 30,000 from project funds) for the storage of mercury containing waste at the premises of National Emergency Management Authority (NEMA), and used for storing the obsolete chemicals including mercury collected from various sites from 21 provinces of Mongolia.

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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Despite the political will, the government of Mongolia neither had the full resources nor the capacity to effectively address the country's problem on mercury containing waste resulting from remediation of historical contamination hot-spots. This project was specifically designed to address current regulatory weaknesses on mercury management and to build national capacity for remediation of mercury hotspots and assist Mongolia to fully implement its zero-mercury policy that it adopted in 2008. This project was highly relevant as Mongolia signed the Minamata Convention on Mercury on 10 October 2013 and was in line with the country's zero mercury policy. Some stakeholders consulted during the TE believed that the implementation of the project contributed to an early ratification of the convention on 28 September 2015, and Mongolia was the first Asian country to ratify the convention.

The project is directly in line with the GEF 5 Focal Area Strategy for the Chemicals focal area "to promote the sound management of chemicals throughout their lifecycle in ways that lead to the minimization of significant adverse effects on human health and the environment" and in particular Objective 3 to "pilot sound chemicals management and mercury reduction." This project sought to support the GEF Chemicals program focal area by strengthening local and national capacity to effectively manage and reduce mercury use, emissions and exposure in Mongolia.

4.2 Effectiveness	Rating: Satisfactory
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This TER concurs with the rating assigned to the effectiveness of the project as ‘satisfactory’. The project helped in developing draft national legislation on mercury waste management and guidelines on hazardous waste management. The draft legislation is not yet adopted by the Government. The TE notes that, while the draft is available, approval of the policy/legislation may not always take place within the limited time frame of the project. But 70% of the funds were directed towards capacity development. Trainings and capacity building of national stakeholders (Institute of Chemistry and Chemical Technology (ICCT), Specialized Space Inspection Agency (SSIA) and NEMA) in the sampling and monitoring methods, and in remediation and stabilization techniques, was also successfully executed. Under the same component, the project supported, though not planned initially, the construction of an interim storage facility, that is currently used for storage of obsolete hazardous waste including mercury from various sites in 21 Provinces, with 1 tonne of mercury stored at the time of the TE.

Outcome 1.1: Regulatory framework and national guidelines established for environmentally sound management of mercury containing waste – **Moderately Satisfactory**

Delivery of outputs for this outcome has been satisfactory. However, while the national regulation on mercury added products and wastes was drafted, it has yet not been adopted. As per the TE, the national regulation is believed to be adopted once the hazardous treatment facility and landfill site are available. The first pilot hazardous landfill was to get operational in 2018 but construction of hazardous treatment facility was delayed due to high costs. The TE notes that approval of regulations may not always take place in the limited time frame of a project. But, as per the project document (Pg 13), the project was supposed to coordinate with the ongoing mercury initiative of UNEP, in order to support assimilation of the global legally binding instrument on mercury into national policy. It is not clear from the available reports if efforts were made to develop such synergies. However, several guidelines for Environmentally Sound Management (ESM) were translated in Mongolian language for use of the authorities and various other stakeholders.

Outcome 2.1: Capacity developed for the implementation of remediation and stabilization techniques - Satisfactory

As planned during the project development, soil and water samples collected and analyzed at Boroo site showed low contamination, due to which it was decided to not undertake the pilot scale demonstration on remediation using one of the techniques. Instead two other techniques successfully tested at laboratory scale were demonstrated at the site. The capacity of national stakeholders (ICCT, NEMA and SSIA) have been successfully strengthened in the sampling and monitoring methods, and in remediation and stabilization techniques. The TE confirms that ICCT are already using some of the sampling techniques, while NEMA are training its officers on the remediation and stabilization techniques learned from the project. As per the decision taken during PSC meeting, project funds were used to construct an interim facility for storing obsolete and confiscated stock of mercury and other identified obsolete hazardous chemicals.

Outcome 3.1: Information disseminated, and awareness raised through campaigns on mercury health and environment risk reduction - **Satisfactory**

The outputs have been satisfactorily delivered for this outcome. Whilst the TE confirms that awareness of major stakeholders has been raised, the extent to which this awareness campaign reached the general public couldn't be assessed.

4.3 Efficiency	Rating: Satisfactory
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This TER agrees with the rating assigned to the efficiency of the project as 'satisfactory'. The project was delayed by one year and granted a no cost extension. The delay was mainly due to extreme continental climate that prevails in Mongolia from November to April, the two trainings that required demonstration had to be organized during May to October in 1st and 2nd year of the project. But, as per the TE, delays didn't impact the quality of the project outputs that were delivered with no additional cost to the project. The project used cost effective approaches, such as a competitive bidding process to select a national company for constructing the interim storage facility, with the cheapest bid and in compliance with the technical part. Also, the cost of the recruiting National Project Manager (NPM) from UNIDO was shared with the other project. This mechanism proved cost effective as all the outputs were achieved satisfactorily and the project could make savings that mitigated to some extent the additional cost for the extension of the project. As per the TE, co-financing from the government and Mireco, also materialized as per the original plan.

4.4 Sustainability	Rating: Moderately Likely
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The project has a strong political will and has helped in developing local and national capacity for the implementation of remediation and stabilization techniques for mercury management through training and demonstration activities. However, approval of the regulatory framework drafted through the project, is still pending, and would require more financial support, due to which the sustainability of outcomes is assessed to be moderately likely.

Financial – Moderately likely

Based on the evidence in the TE, this TER assesses the risk to financial sustainability to be moderately likely, while the TE assesses it to be 'likely'. According to the TE, the government of Mongolia is committed and invested (with financial aid from various agencies) significantly to decontaminate historical mercury hotspots in past. With zero mercury policy in place, it is likely to sustain its efforts in future as well. For instance, National Emergency Management Agency (NEMA), assisted by the provincial SSIA in 2013, remediated a mercury contaminated site in the Bayankhongor Province. However, a draft national regulation on mercury management developed during this project, is not yet approved by the government. As per the TE, the approval of the regulation is contingent upon having a hazardous treatment facility and landfill site available for management of the obsolete waste including mercury. While the pilot hazardous landfill site is in place and will be operational in 2018, the

construction of treatment facility is delayed due to high costs. It is not clear from the TE if the government is making efforts to find financial support to construct this facility.

Sociopolitical - Likely

The fact that the Government of Mongolia has adopted a zero-mercury policy and taken measures to address its historical mercury hotspots clearly indicated the existing political will to phase out the use of mercury and to soundly manage existing contaminated sites and mercury containing wastes. It also signed Minamata Convention of mercury in 2013, with the contribution of the project and assistance from UNITAR and ratified it in 2015. As per the TE, Mongolia is also seeking assistance from GEF to develop a national action plan in compliance with Annex C of the Minamata Conventions. Hence, the sociopolitical risks that may jeopardize the project outcomes are considered to be minimal.

Institutional – Moderately likely

The institutional framework is in place in Mongolia, with zero-mercury policy adopted in 2008 and the government of Mongolia committed to phase out the use of mercury. The project was developed to strengthen the regulatory framework for the sound management of mercury that was not approved by the government at the time of the TE. Some of the other regulations are in place, for instance: the importation of hazardous classes of chemicals requires an import permit from the authorities, their trade and uses are strictly controlled, and some heavy metals including mercury are banned. Overall, the government authority, NEMA, owns the responsibility for management hazardous wastes including obsolete stocks of chemicals and cases of chemical spills and contamination. Capacity of NEMA was strengthened through various trainings under the project to monitor and remediate mercury contamination sites. The TE reports that NEMA further trained its rescue officers (SRU) on the new techniques for monitoring and planning and the remediation techniques.

Environmental – Likely

No environmental risk identified that can influence or jeopardize the project outcomes and future flow of project benefits.

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?

The TE couldn't verify the extent to which the cash plus in-kind contribution from government of USD 1,439,000 materialized, given the involvement of a large number of government officers both at central and provincial level (e.g. MEGDT, MOH, NEMA, SSIA and Selenge Province) in project activities, and provision of office space. It notes that the co-financing contribution from UNIDO and Mireco materialized fully.

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 was delayed by almost a year and granted one year no cost extension. The delays were mainly due to inappropriate climatic conditions to undertake the training workshops that included field demonstration. However, these delays did not impact effectiveness of the project as quality outputs have been delivered, nor the sustainability of project outcomes. For instance, in the context of their duties, NEMA, SSIA, and ICCT already adopted some of the new techniques they were trained on in the project. And the interim storage facility was being effectively used by NEMA to store stocks of mercury and other hazardous obsolete chemicals identified during the inventory made during the project.

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 project was hosted at the Ministry of Environment, Green Development and Tourism within which a National Project Director (NPD) was nominated. The Project Management Team (PMT) was also located at the premises of the MEGDT. Involvement of government officers (e.g. MEGDT, MoH, SSIA, ICCT and NEMA) was evident through their active participation in project activities such as project steering committee meetings, training and awareness workshops, collection of mercury wastes, development of awareness raising materials and development of standards for construction of interim facility was very satisfactory and contributed to successful implementation of the project. The national counterparts were fully engaged in all phases and had a strong ownership of the project.

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: Satisfactory
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This TER concurs with the rating assigned by the TE to the M&E design at entry as 'satisfactory'. The Project Document (PD) included a comprehensive Project Results Framework (PRF) with details on the expected outcomes and outputs of the project. The monitoring and evaluation (M&E) plan proposed in the project included SMART and objectively verifiable indicators, with source of identification clearly identified to monitor progress. It also included the budget, appropriate to effectively monitor progress and cover cost of the inception workshop, PSC meetings, meet other reporting requirements and terminal evaluation.

6.2 M&E Implementation	Rating: Satisfactory
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This TER concurs with the rating assigned by the TE to the M&E implementation as ‘satisfactory’. The project held regular Project Steering Committee (PSC) meetings that had the participation of multiple stakeholders including NGOs (although names of the NGOs involved was not given). These meetings were used as a forum to coordinate activities and monitor progress. For instance, decision to construct the interim facility for storage of mercury and mercury containing wastes from the project funds was taken during PSC meeting. This storage facility is being currently used to store obsolete chemicals including mercury products collected from schools, hospitals and other institutions across the country. Annual progress reports and PIRs were also prepared and submitted regularly and provided useful insights for the terminal evaluation. Project had adequate budget, with UNIDO cash financing, to carry out various monitoring activities satisfactorily.

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: Satisfactory
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This TER agrees with the rating assigned to the ‘quality of project execution’ as ‘satisfactory’. The Project Manager (PM), nominated from the UNIDO headquarters in Vienna, was involved during the proposal development stage, and assisted with a full-time supporting staff for the execution of the project. As reported by the TE, the PM provided quality and timely support and guidance to the Project Management Team (PMT) and national counterparts. He attended the inception workshop, participated in all the PSC meetings and was involved in the design of the interim storage facility. Despite managing 16 projects in parallel, the PM provided adequate and timely supervision and backstopping to the project implementation, both in terms of technical guidance and administrative actions. UNIDO supervision and backstopping is considered satisfactory.

7.2 Quality of Project Execution	Rating: Satisfactory
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As per the TE, the project management and overall coordination by the Project Management Team (PMT) constituted by the National Project Manager (NPM), two consultants, and the NPD, was satisfactory. The project had an ‘active involvement of national stakeholders in all the project activities (that) contributed to high ownership and successful delivery of outputs’. For instance, a consortium of international contractors (MAYASA, Polyco and EMGRISA) hired to provide services for component 2, satisfactorily completed monitoring network and pilot remediation activities at the Boroo site and provided related training course to national stakeholders. Similarly, the MEGDT, in collaboration with

the project, assisted by the National Emergency Management Authority (NEMA), the State Specialized Inspection Agency (SSIA), the Institute of Chemistry and Chemical Technology (ICCT) and the authorities of the 21 provinces of Mongolia undertook the collection of obsolete chemicals including mercury products in schools, hospitals and other institutions across the country to be stored at the interim storage facility supported through the project.

However, involvement of the Ministry of Health (MOH), was limited as the representatives of MOH in the project changed 3 times during project duration. The participation of MoH was limited to awareness raising campaigns. The impact of their limited participation on the project outcomes is not known as most of the outputs listed under this component were achieved.

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.

As per the TE, at the time of the evaluation, 1 tonne of mercury was reported to be stored safely at the interim storage facility supported through the project (TE pg 11).

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.

None.

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

1. Through the project (during training workshop by Mayasa in September 2015), the capacity of NEMA has been strengthened to monitor and remediate mercury contaminated sites. In September 2016, NEMA further trained 19 officers of its Special Rescue Unit (SRU) on these new sampling techniques and plans to train additional 20 officers of SRU on the new remediation techniques. As recorded by the TE, in 2013 NEMA was contacted by the authorities of the Bayankhongor Province for a mercury contamination case. The local SSIA sampled the site, and analysis of these samples confirmed the mercury contamination of the site. NEMA undertook its remediation by excavating and landfilling the contaminated soil at a dedicated landfill.

2. Project also organized 2 awareness raising workshops targeting all relevant government organizations and the local environmental offices of all 21 provinces. The project also contributed to increased awareness on mercury amongst the local stakeholders as awareness raising materials in local language (7 booklets and 1 brochure) produced and distributed to the national stakeholders and short video on mercury wastes broadcasted on 3 national TV channels during July-August 2015

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.

None.

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.

1. TE notes that the project catalyzed the enforcement of the zero-mercury policy in the Selenge Province. As a result, numerous cases illegal use of mercury was identified and referred to police for legal action.

2. Some stakeholders contacted during the TE believed that the implementation of the project contributed (and assistance of UNITAR) to an early ratification of the convention on 28 September 2015, and Mongolia was the first Asian country to ratify the convention.

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.

1. For projects expected to develop or strengthen the legal framework, the design should plan for realistic timeframes. Projects that have duration of less than 4 years, it would be unrealistic to propose such components and expect that the regulations be adopted within the project duration.
2. The delays encountered in the project were due to inappropriate climatic conditions to undertake the training workshops that required field demonstration. The lesson is that proper planning taking into consideration local conditions would avoid delays in project implementation.
3. A committed project team coupled with active participation of partners and stakeholders would contribute to achieve effective implementation.

9.2 Briefly describe the recommendations given in the terminal evaluation.

1. A national regulation on mercury added products and mercury containing wastes has been developed but not yet approved and adopted by the government. To ensure impact of the project, it is recommended that MEGDT take necessary actions for this legislation be adopted and enforced.
2. Although small scale gold mining is not authorized in Mongolia, this activity is still likely contributing to local economies in the rural areas. Proposing alternative mercury free methods to small scale miners would potentially contribute to reduce illegal use of mercury in this sector.
3. To ensure good visibility and impact of the project, the project outcomes and results could be summarized and disseminated to other provinces, especially those provinces where small-scale mining activities are prevalent.
4. The results of the monitoring and health assessments carried out at the Boroo site in the Selenge Province have not yet been disclosed to the beneficiaries. The project should rapidly proceed to inform the relevant beneficiaries of the results of these assessments.

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 is quite comprehensive in its assessment of relevant outcome and impacts. However, implication of some of the outcome such as regulatory measures drafted through the project, but not yet approved by the government, is not covered in adequate detail.	MS
To what extent is the report internally consistent, the evidence presented complete and convincing, and ratings well substantiated?	The report is internally consistent and ratings well substantiated.	S
To what extent does the report properly assess project sustainability and/or project exit strategy?	Except that the report doesn't cover the impact of the proposed regulatory framework, prepared during the project, on the sustainability of the outcomes, rest of the aspect were adequately discussed.	S
To what extent are the lessons learned supported by the evidence presented and are they comprehensive?	Lessons learnt were comprehensive and supported adequately by the evidence in the report.	S
Does the report include the actual project costs (total and per activity) and actual co-financing used?	The report confirmed all the costs but co-financing contributions from the Government couldn't be verified due to the difficulty in obtaining these numbers from project accounts.	S
Assess the quality of the report's evaluation of project M&E systems:	The report covered this aspect adequately well.	S
Overall TE Rating		S

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