Final Evaluation

RER/01/G33
Black Sea Ecosystem Recovery Project

PIMS Number: 3065
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PREFACE

This report sets out the findings, lessons learned and recommendations for the final evaluation of the UNDP/GEF Black Sea Ecosystem Recovery Project (BSERP). The report is delivered in compliance with the Terms of Reference developed by UNOPS, who are tasked with managing the BSERP on behalf of UNDP. The evaluation is based upon collected reference materials from the project, as well as a series of interviews of key stakeholders and participants during February – May 2008.

The evaluators would like to thank the BSERP project implementation unit and country team leaders for their assistance with evaluation mission logistics and project documentation, and to thank the many project stakeholders for taking the time to discuss project achievements.

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EXECUTIVE SUMMARY

This constitutes the final evaluation of the Black Sea Ecosystem Recovery Project (BSERP). The evaluation is designed to enable key stakeholders to assess the relevance, efficiency, effectiveness, impact and sustainability of the project at its conclusion. This final evaluation report constitutes the combined outcome of a literature review and interviews of key stakeholders and participants.

The BSERP was developed under the auspices of the Global Environmental Facility (GEF) International Waters Program, implemented by the United Nations Development Program (UNDP) and executed by the United Nations Office for Project Services (UNOPS). Partners include the six coastal Black Sea countries: Bulgaria, Georgia, Romania, the Russian Federation, Turkey and Ukraine. The participating countries are members of the Black Sea Commission, created through the Bucharest Convention. The BSERP was launched in 2002 as one of three projects in the GEF Strategic Partnership on the Black Sea and Danube Basin, constituting a joint capacity building and investment program aimed to reduce nutrient loading and restore Black Sea / Danube ecosystems.

The $10 million (GEF contribution) BSERP builds upon earlier GEF support in the Black Sea region, launched to assess and mitigate a host of human-induced threats, including excessive nutrient loading, over-exploitation of fish stocks, invasive species outbreaks, ill-conceived coastal development, the dumping of untreated solid waste and sewage, and periodic oil spills.

The BSERP was developed to assist in the implementation of practical measures to restore and protect the Black Sea environment as agreed by the coastal countries in the BSSAP (1996). The most important transboundary issue indentified in the Transboundary Diagnostic Analysis (TDA) and addressed in the SAP was the need to reduce nutrient inputs to the Black Sea from riverine and land-based sources. In preparation for the 2nd phase of the BSERP (2005), project outputs were revised out of concern that the conditions of the Black Sea and the principal causes of perceived degradation were still not well understood, consequently, more information was needed in the form of an updated and expanded Transboundary Diagnostic Analysis. There was also recognition of shortcomings in the Strategic Action Plan (BSSAP – 1996), previously agreed to, but not well implemented by the Black Sea countries. Consequently, the Project included as a key 2nd phase outcome a revised SAP, providing practical measures to restore and protect the Black Sea environment. Throughout both project phases the overall development aim was to help the Black Sea countries develop policies, laws and programmes to reduce the loads of nutrients and hazardous substances discharged to such levels as necessary to permit Black Sea ecosystems to recover to conditions similar to those observed in the 1960’s. BSERP also was designed to help strengthen the capabilities of the BSC Permanent Secretariat.

The project was funded in two phases due to financial considerations for GEF. The BSERP Phase 2 Project Document and Logical Framework Matrix list five specific objectives:

1. Support for the consolidation and operation of institutional mechanisms for cooperation under the Black Sea Convention
2. Development of policy guidelines, legal and institutional instruments for pollution reduction from land based activities (LBA) and protection of ecosystems of the Black Sea and coastal zones.
3. Development of economic instruments and promotion of investment opportunities in coastal zones for pollution control and protection of Black Sea ecosystems.
4. Development of operational systems for monitoring, information management and research under the Black Sea Convention
5. Strengthening of public participation in environmental protection through access to information, stakeholder training and awareness raising and implementation of community actions (Small Grants Programme).
Findings

Some of the key indicators for BSERP success were related to regional and national policy and legislative developments. These were based on technical assistance to the Black Sea Commission and the six countries to establish a land based activities protocol, a negotiated fisheries agreement, and coastal zone management strategies. The progress made in these policy areas was significantly less than had been expected at project inception; however, while there were some difficulties in project implementation at the PIU, it is the countries themselves that must be held accountable for the slow pace of policy change.

In areas where the project team was less dependent on government decision-making there is a much more positive story to tell. Good work was done by the project team to better understand the status of the Black Sea ecosystem, to involve NGOs and enhance their capabilities, to establish monitoring and information systems, and to build public awareness and appreciation for Black Sea issues, especially through the annual Black Sea Day celebrations.

During Phase 1, the BSERP encountered management problems, necessitating the replacement of two Chief Technical Advisors (CTAs). During this period the project suffered especially due to a dysfunctional and counterproductive relationship with the BSC Permanent Secretariat. The BSERP – BSC relationship suffered in part from a large gap in expectations concerning the nature of the BSERP role and the extent to which it should act as a subsidiary body to the Commission. Working relationships were resolved during the 2nd phase.

In 2004 UNDP and UNOPS made the decision to further link the Danube and Black Sea projects by appointing a Regional Manager (the CTA of the Danube Regional project). The idea was for the strong deputy CTAs for each project to take on greater day to day responsibilities and the Regional Manager to play a coordinating and policy level role. This hybrid approach enabled the BSERP to move forward without a protracted CTA selection process; however the approach was not ideal given the extensive need for high level attention to turn the BSERP around. The arrangement ended up succeeding largely due to the policy and managerial strengths of the selected regional Manager, as well as the capabilities of experts in both PIU staffs.

The time frame for project task completions experienced some drift. The TDA revision effort commenced during Phase 2, and the TDA was finalized in May, 2007, six months later than planned. Phase 1 inputs and problems with the quality of data received from the countries through the BSC meant considerable time was required in the early months of Phase 2 to get the TDA effort moving. Delays in receiving data and comments from several Advisory groups also held up the TDA development process. The completion of a revised strategic action plan (SAP) slipped, and the process is still underway as the BSERP PIU closes. Extension contracts for consulting assistance to the BSC through May – June 2008 have succeeded to revise and complete a document that (informally) is now agreed to by five of the six contracting parties. Several other expected outputs were also issued only at the end of the project, including training for and transfer of the Black Sea Information System (BSIS).

The overall budget for the project was appropriate, recognising the geographic size of the Black Sea region, the capacities of the countries involved, the significant pollution pressures addressed, the presence of the two additional support projects within the GEF Strategic Partnership, and a parallel support framework through the European Commission (Tacis).

A leading cause of nutrient loading into the Black Sea is from agricultural sources, however the BSERP was designed only to survey and inventory the region’s agricultural situation and provide a small amount of training on best agricultural practices.

The BSERP can point to successful adaptations, for instance in the decision to couple the BSC Commissioner and BSERP Steering Committee Member roles during the project second phase and organising back-to-back Commission meetings and Project Steering Committee meetings. This change helped forge closer cooperation between the project...
and Commission, and reduced steering meeting time and cost. Adaptive management is evident in the decision to downgrade certain activities where there was not enough financial weight to make much impact, for instance concerning studies on air-borne dispersion of nitrogen.

The BSERP during its second phase put significant time and effort towards strengthening the BSC and its Secretariat, through financial support for meetings, etc, and in particular through developing an institutional review and exit strategy, both designed to ensure management effectiveness and sustainability of the BSC after the conclusion of the BSERP.

Changes in the staffing of the Permanent Secretariat have increased its technical capability, and while still understaffed have increased its ability to meet planned objectives. Individual country contributions have also strengthened the future viability of the Commission and its Secretariat, in particular the host country – Turkey has indicated its willingness to contribute considerably more than the negotiated $60,000 per country commitment. Nevertheless, difficult decisions over the role and functioning of the Advisory Groups still need to be made, and increased funding of the PS from all countries will be required. Future funding of the Secretariat from the EU may be a future option; however this may hinge on achieving consensus of the 6 countries to invite the EU as a contracting party, and will likely require the Secretariat to demonstrate improved effectiveness.

Lessons and Recommendations

Included in section 3.4 and 3.5 of the full report are a series of lessons learned and recommendations for the Black Sea counties and for UNDP/GEF. Highlights include:

- After 16 years, its time to call a hiatus to GEF support in the Black Sea – on a regional basis. In particular, it will be important for the Black Sea Countries to show a good faith effort in achieving the SAP agreements and ratifying and implementing protocols, before the GEF and other funders provide more assistance at the regional level. There should be opportunities for GEF to continue providing support at the national and local levels, for example on integrated coastal zone management, nutrient discharge reduction and climate change adaptation. The GEF small grants program should be used as a mechanism to continue providing support to local NGOs and building on previous public awareness efforts.

- The revised TDA is a significant improvement over its predecessor; however it took on too much importance and was perceived by several stakeholders to be an external / consultant driven exercise. Future TDA revision support efforts should become part of the ongoing efforts of the transboundary waters commissions and their subsidiary bodies, with GEF projects playing more of a supporting role. Of course, to take on this task requires that commissions are adequately funded and have the requisite technically-competent staff.

- The BSERP provides important lessons on the use of independent scientific advisory groups like the ISG, which can bring top regional scientists into projects, and help to keep applied research efforts focused on scientific discovery. A key challenge is to develop a clear set of agreed objectives and timetables for ISG deliverables, closely aligned to the overall project objectives.

- The management and outcomes of research cruises is another area where the BSERP provides important lessons. The four cruises carried out during the BSERP took a considerable amount of time and financial resources – more than originally anticipated. While the cruises were of scientific use – for instance in helping substantiate the gradual recovery of the Black Sea western shelf and Phyllophora fields, greater use could have been made of the data obtained. In addition, much more attention should be paid to the opportunities for media, public awareness and educational opportunities derived from these cruises.

- Future GEF projects will encounter a similar debate as the BSERP regarding hiring Country Team leaders. While the CTL hiring has been seen by many stakeholders as being beneficial to the implementation of the BSERP, there are significant downside risks:
This can constitute a major cost factor for multi-country projects. What is typically expected as a co-financing cost born by the partner countries becomes an administrative cost to the project – thereby reducing available funds for demonstration projects and other technical assistance.

There is an important issue at stake concerning country ownership and sustainability. If the countries are not financially responsible for in-county project management, they are less likely to have a stake in the outputs and productivity of the CTLs and project as a whole. Also, if the in-country coordination is paid for by the project – then at the end of the project there are likely to be problems in terms of sustaining the effort. The BSERP devised a phase out strategy over the final 18 months to scale back CTL financial support – with the expectation that the countries would escalate their support.

If CTL’s are to play a technical role they need technical skills. This requires a transparent CTL selection process that can identify persons with the requisite technical capabilities.

CTLs paid for by the project but selected by the responsible Ministry officials encounter loyalty and ‘chain of command’ pressures. Who are they responsible to and how can they be replaced if they fail to perform their proscribed duties?

The BSERP included an institutional review for the BSC as well as an exit strategy. These are useful tools to consider for GEF projects that are aiding transboundary waters commissions, especially to help pave the way for post-project financing and sustainability. Key to success is a real commitment on the part of the Commission to cooperate with the management consulting effort and implement the resulting recommendations. The timing of exit strategy development is also crucial. The BSERP/BSC effort would have benefited from an earlier start to this process – soon after the start of the 2nd phase. 2 years is the minimum time needed to put such strategies in place to secure replacement funding and to decide on how best to proceed with activities launched and supported by the GEF project.

The BSC should revise the Secretariat work plan and set a more realistic expectation for activities, commensurate with its budget.

The BSC should act on the BSERP recommendations to revise the Bucharest Convention, SAP and other instruments to reduce the number of Advisory/Expert Groups to three and to dispense with the Regional Activity Centres. The staff size at the Secretariat is not sufficient to coordinate the work of 16 subsidiary bodies and the existing budget does not provide enough support for these bodies to meet.

Further regional studies should be conceived and funding sought to improve the accuracy of calculations on the extent of air born and non point source runoff problems in the Black Sea.

The interministerial coordination effort through the BSERP has not led to a noticeable expansion in the involvement of other local and national government ministries, beyond the identified responsible agencies. The lack of progress is mostly due to a lack of interest, and in some cases strong resistance, from the responsible agencies to this type of assistance. Future projects should avoid an overarching interministerial expectation, but rather to include interministerial coordination within actual planned project outputs and activities. For instance, a planned output to negotiate a fisheries protocol should include the engagement of ministries responsible for fisheries. Efforts to develop integrated coastal zone management should include meetings, training and demonstration/replication at the local government level.
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<tr>
<td>APC/EG</td>
<td>Accident Prevention and Control Expert Group</td>
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<tr>
<td>AG CBD</td>
<td>Black Sea Commission Advisory Group on the Conservation of Biological Diversity</td>
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<tr>
<td>AG ECO/EG</td>
<td>Black Sea Commission Advisory Group on Ecology</td>
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<td>AG ESAS</td>
<td>Black Sea Commission Advisory Group on Environmental and Safety Aspects of Shipping</td>
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<tr>
<td>AG F/MLR</td>
<td>Black Sea Commission Advisory Group on Fisheries and other Marine Living Resources</td>
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<td>AG IDE</td>
<td>Black Sea Commission Advisory Group on Information and Data Exchange</td>
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<tr>
<td>AG LBS</td>
<td>Black Sea Commission Advisory Group on Control of Pollution from Land Based Sources</td>
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<td>AG PMA</td>
<td>Black Sea Commission Advisory Group on Pollution Monitoring and Assessment</td>
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<td>APR</td>
<td>Annual Project/Program Report</td>
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<td>AQA</td>
<td>Analytical Quality Assurance</td>
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<td>Analytical Quality Control</td>
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<td>BAP</td>
<td>Best Agricultural Practices</td>
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<td>Best Available Technology</td>
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<td>Biological Oxygen Demand</td>
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<td>Black Sea Integrated Monitoring and Assessment Programme</td>
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<td>Geographical Information System</td>
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<td>GPA</td>
<td>Global Program of Action, UNEP</td>
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<td>HELCOM</td>
<td>Baltic Marine Environment Protection Commission (Helsinki Commission)</td>
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<td>HoD</td>
<td>Head of Delegation</td>
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<td>ICPDR</td>
<td>International Commission for the Protection of the Danube River</td>
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<td>IFI</td>
<td>International Financing Institution</td>
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<td>IPPC</td>
<td>Integrated Pollution Prevention and Control Directive</td>
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<td>ISG</td>
<td>International Study Group (of the BSERP)</td>
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<td>Monitoring and Evaluation</td>
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<td>RBM</td>
<td>River Basin Management</td>
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<td>Regional Activity Centre</td>
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<td>REC</td>
<td>Regional Environmental Centre</td>
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<td>SAP</td>
<td>Strategic Action Plan</td>
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<td>TACIS</td>
<td>EU Support Program for Russia and the former CIS</td>
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<td>TDA</td>
<td>Transboundary Diagnosis Analysis</td>
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<td>UNDP</td>
<td>United Nations Development Program</td>
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<td>UNOPS</td>
<td>United Nations Office for Project Services</td>
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1 INTRODUCTION TO THE EVALUATION

1.1 Purpose of the Evaluation
The final evaluation is designed to enable key stakeholders to assess the relevance, efficiency, effectiveness, impact and sustainability of the BSERP at its conclusion. The evaluation provides an assessment of achievements against objectives, including a re-examination of the relevance of the objectives and project design. The report considers factors that have facilitated and impeded the achievement of objectives and provides lessons learned and recommendations for the UNDP, GEF and participating countries.

1.2 Structure and Methodology of the Evaluation
The evaluation has been structured in accordance with UNDP Guidelines for Evaluators. It covers the issues set out in the Terms of Reference for this evaluation, and takes into account the expectations of UNOPS.

This final evaluation report constitutes the combined outcome of a literature review and interviews of key stakeholders and participants. The evaluation team was present at the closing BSERP Steering Committee meeting in late February, 2008 and then travelled to each of the 6 countries that are signatories to the Black Sea Convention to conduct interviews with key stakeholders. Subsequent interviews were carried out in New York, Washington DC and The Hague, as well as follow on phone and email contacts. In Annexes 2-4 are the mission itinerary, persons interviewed and documents reviewed.

The use of stakeholder interviews as the lead vehicle for evaluation has been done recognizing that the BSERP is a capacity building and "influencing" project, designed to build stakeholder support for improved coastal and marine resources management.

Evaluation Report Components
The evaluation report has been developed consistent with the expectations set out in the Terms of Reference for the Assignment. The TOR is included as Annex 1 to this report. Following the standard UNDP evaluation format, the report sets out the development context for the project and followed by an assessment of the project design and project implementation. Lessons learned and conclusions based upon the project results are then provided. Per the expectations set out in the TOR, the evaluators have utilised a four step rating system (highly satisfactory, satisfactory, marginally satisfactory and unsatisfactory) on the following criteria: a) outcomes/ achievement of objectives; b) implementation approach; c) Stakeholder participation / public involvement; d) Sustainability; and e) Monitoring & Evaluation.

2 THE BSERP AND IT’S DEVELOPMENT CONTEXT

2.1 Project Background
The full title of the project is the Black Sea Ecosystem Recovery Project. The Project was developed under the auspices of the Global Environmental Facility (GEF) International Waters Program, implemented by the United Nations Development Program (UNDP) and executed by the United Nations Office for Project Services (UNOPS).

The history of coordinated efforts to stem the accelerating degradation of the Black Sea environment dates to the early 1990’s. A Diplomatic Conference on the Protection of the Black Sea, held in Bucharest Romania, April 1992, paved the way for adoption of the Convention on the Protection of the Black Sea against Pollution (Bucharest Convention - in force since 1994 after ratification by the Black Sea riparian states: Bulgaria, Georgia, Romania, Russia, Turkey and Ukraine). The Convention objectives are to undertake all necessary measures consistent with international law to prevent, reduce, and control pollution discharges into the Black Sea in order to protect and preserve the marine environment. The Bucharest Convention was further elaborated and implemented through the Declaration on the Protection of the Black Sea, signed in Odessa Ukraine, April 1993.
An analysis of root causes, termed the Black Sea Transboundary Diagnostic Analysis (TDA), was completed in June 1996. Based from the TDA, a Strategic Action Plan for the Rehabilitation and Protection of the Black Sea (BSSAP) was agreed to by the riparian states during their meetings in Istanbul, Turkey, October 1996. This meeting also formally launched the Black Sea Commission (aka BSC, or Istanbul Commission) and its subsidiary bodies (Advisory Groups and Regional Activity Centres). At a meeting of the Istanbul Commission, held April 2000, agreement was reached on institutionalizing a Secretariat to the Commission.

External support to the Black Sea Commission commenced soon after it's founding. The Black Sea Environmental Program (BSEP), launched in June 1993, included a series of projects supported by the Global Environmental Facility (GEF), under its International Waters (IW) program. Other donors have also provided strong support to the Black Sea Commission, especially the European Union, through its Phare and Tacis programmes. The BSEP was established in response to regional and global concern about the critically degraded environmental conditions in the Black Sea and the positive policy initiatives taken by the six Black Sea governments at their Odessa meeting. An initial three-year GEF Pilot Phase project, entitled "Environmental Management and Protection of the Black Sea (RER/93/G31)", was launched to: (1) create and strengthen regional capacities to manage the Black Sea ecosystem, (2) develop an appropriate policy and legislative framework for the assessment, control and prevention of pollution and maintenance and enhancement of biodiversity, and (3) facilitate the preparation of sound environmental investments.

Under the GEF, assistance continued with a second regional project, implemented until 1998. GEF support was maintained at a low level during an interim period while the Black Sea riparian countries developed national strategic action plans, and while the launch of a BSC Secretariat was negotiated.

Recognizing the interrelated nature of the Black Sea and Danube River basin ecosystems, a combined GEF IW technical support and investment mechanism was launched in 2001. The “GEF Strategic Partnership on the Black Sea and Danube Basin” is a US$ 97 million capacity building and investment program aimed to restore Black Sea / Danube ecosystems to their 1960’s condition. The Framework Brief for the partnership, submitted to GEF Council in May 2001, established the "Investment Fund for Nutrient Reduction in the Black Sea / Danube Basin” (Implementing Agency: World Bank; budget: US$ 70 million); the “Danube Regional Project (UNDP; US $17 million) and the “Black Sea Ecosystem Recovery Project” (UNDP, US$ 10 Million). The project includes an implementation unit (PIU) in Istanbul Turkey, housed together with the Permanent Secretariat to the International Commission of the Black Sea (BSC).

2.2 Problems Addressed

The UN Environmental program (UNEP) was instrumental in helping to develop the Black Sea Transboundary Diagnostic Analysis TDA (1996). Its characterization of the environmental degradation at that time provided a suitable frame for considering the problems that the BSERP then sought to address:

“In a period of only three decades, the Black Sea has suffered the catastrophic degradation of a major part of its natural resources. Increased loads of nutrients from rivers caused an overproduction of tiny phytoplankton, which in turn blocked the light reaching the sea grasses and algae, essential components of the sensitive ecosystem of the north-western shelf. The entire ecosystem began to collapse. This problem, coupled with pollution and irrational exploitation of fish stocks, started a sharp decline in fisheries resources. To make matters worse, in the mid 1980s, a jellyfish-like species ( Mnemiopsis leidyi), which was accidentally introduced to the Black Sea from the eastern seaboard of America in the ballast water of a ship, invaded the Black Sea. Poor planning has destroyed much of the aesthetic resources of the coastlines. Uncontrolled sewage pollution has led to frequent beach closures and considerable losses in the tourist industry. In some places solid waste is being dumped directly in the sea or on valuable wetlands. Tanker accidents and operational discharges have often caused oil pollution. All of this came at a time when
five of the Black Sea countries were facing an economic and social transition and were unable to take the necessary urgent remedial actions”.

The above scenario remained relevant as a basis for developing and launching the BSERP in 2001-2002. The underlying problems still remained, although a decade of environmental progress coupled with shifting economic patterns and reduced agricultural production had slowed the eutrophication and ecological deterioration of the previous period.

2.3 Project Objectives

As indicated when the project was in its initial stages (PDF-B), the main purpose of the BSERP was to assist in the implementation of practical measures to restore and protect the Black Sea environment, as agreed by the coastal countries in the BSSAP (1996). The most important transboundary issue identified in the Transboundary Diagnostic Analysis (TDA) and addressed in the SAP, was the reduction of nutrient inputs to the Black Sea from riverine and land-based sources. The SAP also provided a policy framework to implement priority actions and address transboundary environmental concerns associated with, amongst others, sustainable fisheries, tourism, conservation of living marine resources and coastal landscapes, and pollution from shipping and land-based sources.

Immediate and development objectives for the BSERP built on the main objective to “take measures to reduce the loads of nutrients and hazardous substances discharged to such levels as necessary to permit Black Sea ecosystems to recover to conditions similar to those observed in the 1960’s”. A corresponding intermediate goal was for urgent measures “to be taken in the wider Black Sea Basin in order to avoid that the loads of nutrients and hazardous substances discharged into the Seas exceed those that existed in the mid 1990’s”. It is important to note that the verification of success in meeting these two goals was made difficult by the substantial information gaps concerning the health of Black Sea ecosystems during these target periods (mid-1990’s and 1960’s).

Overall the project was expected to significantly contribute to the recovery of the Black Sea marine ecosystem by assisting the Black Sea countries to:

- Reduce nitrogen and phosphorus loading into the Black Sea;
- Enhance the service function of wetlands and benthic (seabed) plant communities for the assimilation of nutrients;
- Improve management of critical habitats to permit economic recovery of fisheries in parallel with improvements to the ecosystem;
- Reduce transboundary contamination by hazardous substances, particularly where these have similar sources to nutrients.

The project aimed to help the Black Sea countries achieve these objectives by:

1. Reinforcing institutional mechanisms of the Black Sea Commission, building cooperation amongst the Black Sea countries, and achieving efficient implementation of joint policies and actions, and the operation of common management and control mechanisms.
2. Expanding knowledge of the environmental status of the Black Sea, and monitoring trends.
3. Taking actions to mitigate and reduce inputs leading to eutrophication, and other environmental threats such as hazardous substances and over fishing;
4. Supporting the development of legal instruments for national efforts to manage and protect Black Sea natural resources;
5. Establishing mechanisms to build stakeholder awareness and support for the Black Sea within the 6 riparian states;
6. Designing and applying economic instruments to pay for environmental interventions needed to improve Black Sea water quality.
2.3.1 Project Phases

The project was funded in two phases due to financial considerations for GEF. This two phased approach required development and approval of a second ProDoc at the completion of the first phase (2004). There was also a mid term evaluation carried out after the Phase 2 ProDoc had been approved. The MTE recommendations were then taken into account by the project team and implemented through the Project Implementation Plan and revisions to the LogFrame.

2.3.2 Outcomes & Indicators

As required, the BSERP Team developed a Logical Framework Matrix for its Phase 2 activities which sets out the long term and specific objectives of the effort, the verifiable indicators of achievement, sources of verification as well as key assumptions and risks. The project was organised around a set of five specific objectives, which served as the 5 major project components, to which were attached corresponding outputs and activities.

There is an ongoing effort at GEF to improve and standardize indicators, and draft guidance has been developed that differentiate between five types of outcome indicators: project process, catalytic process, project stress reduction, catalytic stress reduction and environmental status. The BSERP Phase 2 ProDoc was developed prior to this guidance. The Project Logical Framework Matrix contains a set of verifiable indicators, which are presented below using the above typology. It is important to note that all of the indicators set out for the project, both at the objective and output level, are process related. There is no indication that project activities were expected to have a direct impact by reducing stress to the ecosystem or changing its environmental status.

**Objective 1:** Supporting the consolidation and operation of institutional mechanisms for cooperation under the Black Sea Convention.

**Verifiable indicator for objective 1:** At the end of the Project the institutional mechanisms of the Black Sea Commission are reinforced and fully operational ensuring cooperation between all Black Sea countries to efficiently implement joint policies and actions and operate common management and control mechanisms. *(Catalytic process)*

**Objective 2:** Development of policy guidelines, legal and institutional instruments for pollution reduction from land based activities (LBA) and protection of ecosystems of the Black Sea and coastal zones.

**Verifiable indicator for objective 2:** Policies and legal and institutional instruments in all Black Sea countries are revised and reinforced to assure sustainable coastal zone and marine resource management while reducing nutrients and hazardous substances through the application and translation into concrete actions of revised policies and legislation in the agricultural, industrial, transport and municipal sectors. *(Catalytic process)*

**Objective 3:** Development of economic instruments and promotion of investment opportunities in coastal zones for pollution control and protection of Black Sea ecosystems.

**Verifiable indicator for objective 3:** Economic analysis taking into account the principles of EU WFD guidelines is carried out in all Black Sea countries and most cost-effective measures for pollution control and water use are identified and control systems (incl. pollution charges, fines and incentives) are developed and accepted at the national level in the Black Sea countries. *(Project and catalytic processes)*

**Objective 4:** Development of operational systems for monitoring, information management and research under the Black Sea Convention.

**Verifiable indicator for objective 4:** Institutional and organizational mechanisms for transboundary cooperation in water quality monitoring and information management including GIS are established and fully operational at the regional and national level by 2006 to assess water quality and nutrient reduction to the Black Sea; at the same time, results from scientific research in nutrient reduction and
eutrophication are available to enhance reporting on the status of the Black Sea.

**Objective 5:** Strengthening of public participation in environmental protection through access to information, stakeholder training and awareness raising and implementation of community actions (Small Grants Programme).

**Verifiable indicator for objective 5:** The civil society and in particular national NGO’s in all Black Sea countries are at the end of the project informed and proactively participating in national programmes for nutrient reduction, coastal zone management and protection of coastal and marine ecosystems (project and catalytic process).

## 3 FINDINGS

### 3.1 Project formulation

The BSERP project design had direct relevance within the GEF guidelines as well as in terms of global concerns for the Black Sea. During ProDoc development there were concerns that the conditions of the Black Sea and the principal causes of perceived degradation were not well understood, consequently, more information was sought, in the form of an updated and expanded Transboundary Diagnostic Analysis, bolstered by a fairly robust (applied) research program. There was further recognition of shortcomings in the Strategic Action Plan previously agreed to, but not well implemented by the parties, so the Project included plans for a revised SAP. Central to any updating process should have been an assessment of the successes and failures of the previous TDA/SAP process, and a gap analysis on the status of achievement for the existing BSSAP. Such ‘lessons learned’ were not emphasised in the first Project Document, however in 2000, the original SAP implementation was only 4 years in progress, so it was perhaps a bit premature to already anticipate the slow pace of country efforts to meet agreed actions. However, the second phase ProDoc was developed after the Ministerial Meeting in Sofia on June 14, 2002, where decisions were made to revise and extend most of the deadlines for country action. This should have been a signal that the countries were not prepared to meet their obligations, and this risk should have been more fully explored within the ProDoc and LFM.

The project was designed in a period when it was known that a substantial part of the Black Sea basin was relatively ‘data and information poor’. For instance most national monitoring programmes were under-performing during the 1990’s, generating meagre, sometimes erroneous and often inaccessible data. At the start of the new millennium there was little basis for optimism that this would rapidly improve, given further reductions in marine research budgets, and a continuing reluctance on the part of governments and institutes in the region to share their data. Yet several project components hinged on the sharing of reliable and robust data, for example to assess the environmental status of the Black Sea and properly link the status with actual pressures and then to propose effective measures. Although the project design included activities that would generate new data and information, it could have been anticipated that the results of field work, for instance from the research cruises, would take time to produce and assess and would only be available late in the project cycle.

There was genuine concern that the Black Sea was experiencing major eutrophication problems, largely due to discharges from the major tributary rivers, in particular the Danube, caused by excess nutrient loading. Consequently, the project focused on nutrient issues and drew attention to non point source as well as point sources. Unfortunately, this focus did not translate into specific activities designed to reduce the leading cause of nutrient loading: agriculture. All that was expected under the BSERP was to survey and inventory the region concerning agriculture nutrient sources and to do a bit of training on best agricultural practices.

The project design reflects a major concern about the state of fisheries in the Black Sea. It proposed as an output the development of a draft fisheries protocol to the Black Sea Convention. The problem in this design is that the Black Sea Commission and
participating countries were under no compulsion to do anything with the draft protocol that was created, and consequently no real progress was made towards the formation of a binding agreement on fisheries. The 2nd tranche log frame indicted as a risk that the parties would draw out their negotiations on how best to develop a legally binding document on fisheries (LFA Output 2.6). This indeed occurred, and the fisheries component was largely unsuccessful. It must be recognised that this delivery ‘failure’ had as its major cause a barrier that was beyond the project to overcome. The key barrier to moving this initiative forward was the new legal situation once Romania and Bulgaria became members of the European Union. Both countries lost sovereignty over the fisheries agenda, and the EC had no standing within the Black Sea Commission to negotiate with the other four countries on behalf of Romania and Bulgaria. Unless or until this legal barrier is overcome, through approval of the EU as a contracting party, the Black Sea commission will have limited authority on Black Sea fisheries issues.

The project included institutional strengthening and capacity building components, notably for the Black Sea Commission and its Permanent Secretariat. This was a critical part of the project, as it was designed to help with long term sustainability of the Black Sea protection effort. The capacity building aspects were underwhelming in the 1st tranche document and the approved 2nd tranche ProDoc. It was significantly strengthened only after the project mid-term evaluation, which suggested including an Institutional Review for the BSC and an Exit Strategy.

The Project Design development succumbed to a typical problem for large GEF IW projects: an overly ambitions array of expected outputs and activities, each of which was important, but each of which was given insufficient financial support to have a real and lasting impact. The BSERP Phase 2 ProDoc had 14 planned outputs each with 5 – 7 related activities, covering applied research (joint sea research cruises), information system development (BSIS), institutional strengthening, small grants and NGO support, media and communications strategies and policy development. The Phase 2 project document was developed in full awareness of the overly ambitious project expectations; however the modified LogFrame nevertheless still implied considerable achievements in areas where there were insufficient resources. The team considerably reduced Output 3.1 activities focused on economic analysis, yet with a very limited budget still indicated several deliverables. The resulting reports have been disseminated at the end of the project seminar; however it is difficult to imagine they will get much traction in the Black Sea countries without significant additional funding to adapt the information to local economic conditions. The BSERP was not designed and budgeted in a way that would enable much economic work to be done, especially recognising the complexity of the subject and the difficulties that many Black Sea countries will face in generating the kind of data required. This situation points to a greater issue for UNDP/GEF, and that is the generally low level of attention paid to economic studies, and cost-benefit analysis in transboundary waters projects. A key question to try and answer in all of the transboundary projects is what are the economic consequences of greater ecosystems protection? And its corollary: What are the impacts if nothing gets done? Future projects of similar magnitude to the BSERP should employ a dedicated economist to work with the contracting parties on making an economic case for the policy changes being advocated.

As indicated in the following sections of the evaluation report, there were some shortcomings in the quality and extent of implementation and achievement of the BSERP. These are problems that had their germination in the project formulation phase, as they are the results of an overly-ambitious ToR, under-resourcing to meet the ToR and a failure to agree with the Black Sea Commission on project priorities. In particular, more attention should have been paid during project formulation to structure and clarify the working relationship between the Project Team and the BSC Secretariat.

3.1.1 Appropriateness of the project concept and design

It would have been difficult for any project document developer to envision the significant institutional changes that would transform the region during the project time period. At
the time of its creation, the concept was relevant. The period 2000-2008 has been quite
dynamic from socio-economic and political points of view. In several countries,
governments changed frequently; the status of Bulgaria and Romania altered from ‘pre-
accession’ to full EU Member States; the economy in most countries has not prospered
during the project period.

Most Black Sea countries have been oscillating between greater centralisation of political
power and greater regional and local autonomy. As with other GEF IW project efforts, the
BSERP was designed with a central government focus, yet the key day to day decision
making with the greatest impact on coastal ecosystems is occurring at the local level. A
stronger local government focus of the project design, especially for the integrated coastal
zone management effort, may have enabled the project to achieve greater replication
success.

The project’s Logframe for Phase 2 takes note of many assumptions and risks, all of them
relevant in the context of the Black Sea basin. Some risks indeed were substantiated, like
the (lack of) timely and reliable data. Several assumptions either directly or indirectly
referred to the commitment of the Black Sea basin countries as being a significant risk.
This risk was likewise well-substantiated.

3.1.2 Project contribution to overall development objectives

The overall objective aimed to support the participating countries in the development of
policies and legislation and the definition of priority actions to reduce the discharge of
nutrients. The emphasis was on regional, overarching action plans and protocols rather
than national policies and legislation. There were some activities designed to assist with
defining priority national and local actions, for instance ICZM strategies and demonstration
projects (see Output 2.2) and feasibility studies for treatment works investments (output
3.2) however there was no replication strategy envisioned to build on these targeted
efforts.

3.2 Project implementation

In general the BSERP faced major difficulties in its implementation and management. At
one point just prior to the launch of Phase 2 it was at risk of being cancelled due to
performance problems. At the time of the mid term, the relationship between the Project
PIU and BSC Secretariat was highly dysfunctional. During the project second phase,
changes in personnel of the Project and BSC contributed to a significant improvement in
cooperation and a significant improvement in project implementation. This cooperation
was augmented by mid-project changes which placed even greater importance on
institutional strengthening and program assistance to the BSC.

The BSERP outputs were supposed to especially focus on policy development, including a
land based sources protocol, a Legally Binding Document (LBD) on Fisheries,
improvements in coastal zone management, and steps to reduce nutrient loading. While
there were clearly some difficulties in project implementation that can be set at the feet of
the PIU, it is the countries themselves that must be held accountable for deficiencies in
project implementation. A lack of country ownership, and in some cases country
opposition to the BSERP effort, made it extremely difficult for the PIU to effectively carry
out its assignments.

The BSERP was developed as part of a strategic partnership that included the UNDP –
implemented Danube Regional Project and the World Bank – implemented nutrient
reduction facility. Special effort was made to link these three initiatives, including annual
combined meetings. In the case of the DRP and BSERP, the linkage was strongly made
through a commingling of PIU management during the final several years of both projects.
It is clear that for a variety of reasons a productive link between the capacity building
UNDP effort and the investment oriented World Bank efforts was never forged. The
rationale for linkage was strong.
3.2.1 Project management

Management of GEF IW projects is often considered an issue primarily for the PIU staff. In fact, the PIU is only one of the key responsible actors. Others include management representatives at the UNDP, GEF, and UNOPS and in particular the steering committee members and focal points from the participating countries.

During Phase I, the BSERP encountered problems with the functioning of the PIU, and there was significant staff turnover, including the replacement of two Chief Technical Advisors (CTA’s). In 2004 UNDP and UNOPS made the decision to link the Danube and Black Sea projects through appointing a Regional Manager (the DRP CTA). The idea was for the strong deputy CTA’s for each project to take on greater day-to-day responsibilities and the Regional Manager to play a coordinating and policy level role. Under the circumstances this decision made good sense. The hybrid approach provided a much closer linkage between the two connected projects. It also enabled the BSERP to move forward without a protracted search and negotiation for hiring a new CTA. The approach was aided by the policy and managerial strengths of the selected regional Manager, as well as the capabilities of other PIU management and experts.

Interviews during the evaluation pointed out that many participants would have preferred having a full time CTA selected, who could have put more time and energy directly towards issues in the Black Sea. Stakeholders understood and accepted the reasons for the regional manager approach, yet still felt that the Black Sea effort deserved a full time high level manager. This concern was further heightened by the fact that the Regional Manager took a new GEF assignment prior to completion of the BSERP.

During the BSERP first phase, a decision was reached with the project steering committee to employ country team leaders (CTLs) in each of the Black Sea countries. These persons were tasked as full time project staff, responsible for coordinating BSERP activities in their country, in addition to wider issues responsibility (i.e. ICZM and Pollution Monitoring and Assessment). Under the circumstances, with the BSERP getting only limited support from several of the participating countries, a decision to hire CTLs was made by the Steering Committee, based from the urging of the CTA at the time. As noted in the lessons learned section of this evaluation (section 3.4 #4), the decision to hire CTLs carries risks that were borne out by the BSERP experience, for example:

- The CTL effort constituted a major cost factor for BSERP, and freed the responsible agencies of their agreed co-funding commitment. The cost of hiring and managing these six full time CTAs reduced available funds for demonstration projects and other technical assistance in the midst of a project that was already under-funded based on expected outputs.
- CTLs were selected by the responsible agencies in the governments, based on project-developed terms of reference. The technical capabilities of the CTLs were not necessarily the key determinant on who got selected.
- The arrangement of having the responsible agencies in the countries select the CTLs while the project paid their salaries created some difficulties in terms of loyalty and ‘chain of command’ issues. For instance if a CTL was found to be ill-suited to the assignment, it was difficult for the PIU to negotiate a replacement.

3.2.2 Quality of inputs and activities

Staff inputs were generally of good quality. The PIU experts (including the ones deployed through UNEP/GPA) were qualified for their tasks. Their co-operation with the major project counterparts, stakeholders and other experts overall has been appreciated. The project employed a wide range of regional experts, whose inputs were indispensable for many activities and outputs. The performance varied among individuals, but was generally satisfactory.

The Project Team developed annual work plans which were reviewed and approved by the Project Steering Committee. As exhibited by the work plan for 2007, the plans explained expected achievements on each output and activity. The Work Plans did not go into detail
on the sequencing of sub-activities and did not specifically indicate which project staff person would be responsible.

The time frame for project task completions experienced some drift. The TDA revision effort commenced during Phase 2, and the TDA was finalized in May, 2007, six months later than planned. Phase 1 inputs and problems with the quality of data received from the countries through the BSC meant considerable time was required in the early months of Phase 2 to get the TDA effort moving. Delays in receiving data and comments from several Advisory groups also held up the TDA development process. The completion of a revised strategic action plan (SAP) slipped, and the process is still underway as the BSERP PIU closes. Extension contracts for consulting assistance to the BSC through May – June 2008 have succeeded to revise and complete a document that (informally) is now agreed to by five of the six contracting parties. Several other expected outputs were also issued only at the end of the project, including training for and transfer of the Black Sea Information System (BSIS).

3.2.3 Budgeting

The overall budget for the project was appropriate, recognising the geographic size of the Black Sea region, the capacities of the countries involved, the significant pollution pressures addressed, the presence of the two additional support projects within the GEF Strategic Partnership, and a parallel support framework through the European Commission (Tacis). Whether the budget was sufficient opens up a wider discussion of objectives and expectations. Developing draft policies and plans, and training ministry staff, do not guarantee a reduction in pollution. It is only if and when these draft policies are implemented by the countries and lead to increased budgets and greater compliance, that the adequacy of the BSERP budget can be measured.

Budgeting for the project was made difficult by the deflating value of the dollar against the Euro and currencies in the Black Sea region, creating a nominal 20% reduction in available financing. The BSERP was also hit with unforeseen UNOPS headquarters charges (in this case for ASHI – After Service Health Insurance, for long term UN employees). These charges were assessed after project approval and on top of the expected UNDP administrative fee. Future projects, should be configured to include this and any other administrative costs within the budgeted administrative fee.

The PIU had some difficulties determining their budget during the final project year. Apparently, there was some minor overlapping within UNOPS for the budgeting of the Danube and Black Sea projects, largely due to the joint assignment of the Regional Manager and how his costs would be apportioned. However this should not have been a difficult line item to track. Most projects keep a simple spread sheet “shadow” budget that allows them to gauge their funding levels on a day to day basis, which then is matched and revised periodically against the more cumbersome ATLAS budget.

The budgets available for activities such as the reduction of land based sources of chemical pollution, the analysis of air-born nitrogen deposition, improved municipal services budgeting, and priority investments to deal with coastal pollution hot spots were not at levels where major impacts and scientific breakthroughs could be reasonably expected. Funding was sufficient only for small scale studies. Future projects need to hold to a tighter, more rigorous budgeting process. There needs to be enough funding and effort placed behind fewer activities, to ensure that they build into an effort that outlives the project. One-off studies that end in a report sitting on the shelf should be avoided. The PIU and Steering Committee made some progress on narrowing the focus during the 2nd phase, yet they were of chained to the over-ambitious objectives of the original concept and expansive outputs obligated through the Phase 1 & 2 project documents.

The project did not budget sufficiently for translation. Oddly, with 6 countries included, speaking 6 different languages, there was very little done to translate reports and internet pages so they could be understood in each of the countries. Especially in projects that seek to build public awareness and support, there must be consideration given to translating all key documents, at the very least their summaries, into each of the national
languages. Otherwise, outputs are available only to a limited audience. An alternative to a large translation budget is to include upfront commitments from each of the countries to take responsibility for translation of key project documents.

The budgeting and pay out procedures used by the PIU were appropriate and effective. Participants were satisfied with budgeting procedures for conferences and meetings. Also the budgeting for the research cruises was generally handled well, notwithstanding one occasion where the deputy project manager used his own money to get one of the research cruises underway.

3.2.4 Major factors facilitating/impeding project implementation

- The BSERP built upon existing structures established by the Black Sea countries. This included in particular the BSC and Secretariat, as well as advisory groups established during the previous GEF project (BSEP).
- The strategic partnership provided an opportunity to extend cooperation across the entire Danube/Black Sea basin, and to draw important connections between upstream pollution in the Danube and its impact – through eutrophication - in the Black Sea.
- The membership of Bulgaria and Romania in the European Union helped to further cement the participation and support of the EU for Black Sea ecosystem protection.
- Economic changes in the region can be seen both as facilitating and impeding the Black Sea effort. On the one hand, the downturn in the regional farm economy had a beneficial effect in reducing nutrient loading and enabling some recovery of Black Sea ecology. On the other hand, economic upheaval had a seriously negative effect on the capacity of marine research institutes in many of the countries.
- Political upheaval in the region was an impediment to the BSERP. Rapidly changing political fortunes amongst leading political parties in some of the Black Sea Coastal Countries has led to frequent changes in environmental and natural resource ministry officials. In some cases, new governments have also made policy shifts that revise the levels of responsibility for development and environmental protection at the local, regional and central government. This evolving situation with respect to institutional responsibility has created a perpetual sense of impermanence and reluctance to take decisions on environmental issues, including long term actions to reduce environmental degradation in the Black Sea. There have been numerous and frequent changes amongst project counterparts and stakeholders in the participating countries. Advisory group members changed frequently throughout the project period, making it difficult to build and retain continuity. The delay in commencing the actual national negotiations one the draft LBA Protocol partially can be explained by changes in the people involved.
- The production of the updated TDA was seriously hampered by the limited amount of available data that were not always of a proper quality and sometimes hard to be retrieved. The combination of factors added to a delay in the compilation of the TDA. Lack of data and information also hampered other tasks and activities.
- The PIU handled well the management of the Country Team Leaders. There was significant effort made to develop and revise their terms of reference during the early stages of employment, and the PIU managers were wise to include in their remit not only country-based activities but also cross-sectoral responsibilities.
- The project tranche 2 ProDoc was approved prior to conducting a mid term evaluation of the project. This was an error in process and necessitated another project revision once the MTE recommendations came out.
- As noted in the mid term evaluation, closer oversight by UNOPS and UNDP could have helped to identify and rectify problems in project management at an earlier stage during the project first phase.
3.2.5 Adaptive management

Adaptive management is a general term meant to have positive connotations. The hope and expectations are that project managers will recognise that shifting circumstances call for some flexibility in the implementation of project plans. Social and economic upheavals may change the basis for action, the Project Document can be seen to have flaws, there may be changes in government, there may be changes in the project team, there may be new pressures on the environment, for instance due to severe weather. The key to adaptive management is to ensure that changes based on circumstance continue to lead the effort toward achieving its stated objectives.

The BSERP faced quite a few changes in circumstance, such as changes in the economic structure of most of the Black Sea countries, changes in ministry personnel and responsibilities, changes in project team composition and reconsidered project outcomes and activities. The BSERP can point to successful adaptations, for instance in the decision to couple the BSC Commissioner and BSERP Steering Committee Member roles during the project second phase and organising back-to-back Commission meetings and Project Steering Committee meetings. This change helped forge closer cooperation between the project and Commission, and reduced steering meeting time and cost. The decision to hire Country Team leaders was also a successful adaptation. Adaptive management is also evident in the decision to downgrade certain activities where there was not enough financial weight to have much impact for instance concerning air-borne dispersion of nutrients.

3.2.6 BSC Management and execution

The BSERP – BSC relationship suffered from a large gap in expectations concerning the nature of the BSERP role and the extent to which it should act as a subsidiary body to the Commission. Was the PIU’s number one priority to achieve its terms of reference? Or was it to assist the BSC Secretariat to carry out its mission? Should the GEF’s funds have been made available in response to Secretariat demands? Or rather should they have been tied only to activities expressly set forth in the Project Document? This issue strikes at the core of how GEF IW projects should be organised when there is an international commission in place that the project seeks to support. Future projects need to spell out clearly – both in the project Document and in a memorandum of agreement, what are the parameters of the relationship.

The institutional set up of the BSC and its subsidiary bodies has been evolving. The BSC structures set in place by the Bucharest Convention included Regional Activity Centres (RACs) and Advisory Groups (AGs). The AGs provide expertise, information and support to the Commission for implementation of the BS SAP, and were established pursuant to approval of the BS SAP. Activity Centres are authorized in Resolution 4 of the Bucharest Convention, indicating that ‘certain activities concerning technical matters such as organisation of training courses, formulation of pollution control guidelines and joint Intercalibration and inter-comparison exercises, etc shall be carried out by the research institutes of the Contracting Parties as activity centres” (pg 28). The RACs were politically identified and most were not the premier regional or national institutes in the disciplines they were chosen for. At this point, only two continue to receive financial resources from their countries to carry out minor duties on behalf of the BSC. The RACs were an ill-conceived concept that has done little in terms of providing expertise to the BSC as national in-kind contributions.

The BSERP during its second phase put significant time and effort towards strengthening the BSC and its Secretariat, through financial support for meetings, etc, and in particular through developing an institutional review and exit strategy, both designed to ensure management effectiveness and sustainability of the BSC after the conclusion of the BSERP. Despite this effort, at the conclusion of the BSERP, the future viability of the BSC and its PS are at risk. Funding provided by the countries is likely to be insufficient for the Secretariat to carry out its expected assignments. Future advisory group meeting are in doubt due to a lack of funding, as are future efforts to promote the Black Sea Day.
The future sustainability of the Black Sea monitoring program is more optimistic. National sections of the Black Sea Integrated Monitoring and Assessment Programme (BSIMAP) are operated and paid for at the national level by the countries. BSIMAP includes fractions of the national monitoring systems, which countries report on. However, for those stations, which are included in BSIMAP, there are additional requirements from a methodological and analytical point of view. These systems can be expected to continue, and in the case of some countries (Turkey and Romania), expanded geographically and in terms of media monitored.

The BSC Secretariat has been established along similar lines as other International Waters Secretariats. The structure is workable however staffing is insufficient. The budget for the BSC is insufficient if the Commission and Secretariat are expected to lead regional cooperation efforts on such aspects as water quality monitoring, fisheries management, and reduction of land based sources of pollution. The current agenda for the Secretariat includes a long list of activities that would be challenging to achieve even with triple the existing staff and budget.

The Exit Strategy provides a recommendation to increase annual financing commensurate with the amount that has been provided during the previous three years with BSERP support, indicated as between 1.5 million and 1.7 million, (we assume this is dollars although the Exit Strategy does not clarify). This level of increased funding that the authors suggest to achieve by 2010 is unrealistic given the low level of country ownership and the difficulties faced by the Commission to build a regular budget. During their February 2008 Commission meeting, the Commissioners agreed to increase funding to $60,000 USD per year, although a final agreement on this increase from $48,000 had to be deferred to enable the Georgia Commissioner to consult with officials back home. The Commissioners were adamant to keep the funding levels equal, so this means a $300,000 budget. Turkey indicated a willingness to provide additional funding, of over $100,000, which will be needed for the pending move of the Commission offices. Even with this additional contribution, the budget for the Commission will not exceed $500,000 per year; indicating a ‘shortfall’ of more than 1 million USD annually.

3.2.7 Danube /Black Sea Strategic Partnership

There were explicit linkages between the BSERP and DRP and the World Bank Investment Fund for Nutrient Reduction (NRF), in the frame of the GEF – World Bank Danube/Black Sea Partnership Program. The DRP and BSERP are similar in structure and content – as they focus on regional TDA/SAP development and capacity building. The NRF is a $75 million investment fund for projects to reduce nutrient loading.

BSERP/DRP cooperation was formalised in the BSERP ProDoc, supporting implementation of the MOU signed between the Danube and Black Sea Commissions. In particular, a Joint Technical Working Group (JT WG) was established for implementation of the MOU and a work programme was devised. In all, there were four annual JT WG meetings organised from 2002 onwards.

Close collaboration was not seen as a high priority by the project teams during their formative years. During 2004, a Strategic Partnership Stock-taking meeting was held to include 80 high-level country representatives of the ICPDR, BSC, GEF, UNDP and other experts. Subsequently, a closer association was forged, especially between the DRP and BSERP.

The DRP and BSERP projects became closely aligned at the end of 2004, when a decision was reached by UNDP/UNOPS to have the DRP CTA take on responsibility for both projects. This decision was precipitated by management issues at the BSERP. The decision was aided by a conviction that the DRP management team was sufficiently strong, and the project moving smoothly enough, to enable a sharing of the CTA’s time.

Cooperation between the BSERP and NRF remained infrequent throughout project implementation. It was originally hoped that the TDA/SAP procedures and then subsequent monitoring and capacity building efforts under the DRP and BSERP could help to define project priorities and pipelines for investments under the NRF. In practice, the
timing of the NRF programme and WB requirements for investments proved to be impediments to this ideal relationship. In the end, the priority setting and then implementation of capacity building and investment projects proceeded independently, although there has been a concerted effort to share information, with annual meetings held between the Strategic Partnership members during the three years 2005 – 2007.

Ideally, the BSERP would have identified major pollution concerns, including nutrient ‘hot spots’, that then became the focus for investments under the NRF. At the end of the BSERP there is no evidence that this type of linkage occurred. The NRF team carried out their investment project ID efforts without consideration for the findings coming out of the BSERP. The parallel timing of assignments carried out by two separate UN agency projects with different criteria (World Bank ‘bankable project’ considerations for example) are indicated as reasons for the difficulties in successfully building a coordinated sequence of fact finding, capacity building and then investments.

3.3 Project impacts

The BSERP has succeeded in making progress in expanding knowledge, awareness and support for ecosystems protection in the Black Sea region. The Project has had a terms successful impact by expanding understanding of the status of the Black Sea ecosystem and identifying compelling early signs of ecosystem recovery. Impacts are also to be considered with respect to the growing cadre of concerned and involved citizens – as seen through NGO support for the successful small grants effort and growing interest in the Black Sea Day. While there has been an increase in funding for environmental controls on sites listed as hot spots during the project period, this support cannot be attributed to the BSERP effort.

In terms of measures to be taken by the states to reduce nutrients and other hazardous substance loading into the Black Sea, the project has been able to map out some options, supported by a causal chain analysis. The identified options are still rather generic and consequently in most cases not yet costed out. Acknowledging that details are to be elaborated by the countries themselves, the project mostly rendered generic guidance and tools for doing so. For several issues, like hazardous substances, there has been insufficient data shared by the governments and industries to allow for an external assessment and options development. Most of the Black Sea countries still face some problems in their capacity for analysing hazardous and other substances (despite the national and international efforts for increasing these capacities).

From the standpoint of environmental improvement, the impacts of the BSERP are at this point difficult to discern, although it must be acknowledged that the BSERP project had neither the expectations nor the financial resources for measures directly reducing pollution loading from municipal and agriculture sources.

The impacts that were expected, which remain unfulfilled are largely focused towards policy changes at the regional and national levels, and therefore largely in the hands of the BSC contracting parties to achieve. These include:

- the revised SAP is not yet signed (although five countries have informally indicated their approval);
- the LBA Protocol is still under revision (with all but one contracting party ready to agree);
- A coastal zone strategy for the region has been developed but coastal zone plans have not been implemented;
- no areas have been set aside as no fishing zones or marine protected areas (although Bulgaria and Romania have begun to negotiating a joint MPA);
- no changes have been made to fishing quotas or restrictions in the catch of any specific species;
- no particular industrial projects have been altered or closed down as a result of project efforts;
• no coastal wetlands or other fragile ecosystems have been restored or protected;
• no revisions to agricultural policy have been instituted to reduce non-point source runoff;
• no agreements have been reached regarding specific regional measures to reduce marine based invasive species.

3.3.1 Achievements of the project against objectives, outputs and activities

Objective 1. Support the consolidation and operation of institutional mechanisms for cooperation under the Black Sea Convention

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<tr>
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<tr>
<td>1.1: Operational structures and management tools of the Black Sea Commission further developed and functioning.</td>
<td>Achievement under this output can be considered <strong>satisfactory</strong>, in particular considering the strong efforts made during the BSERP 2\textsuperscript{nd} Phase to increase its assistance to the BSC secretariat, including through the Institutional Strengthening Review and the Exit Strategy. What is not clear yet is the extent to which the Commission will agree to act on the good recommendations developed. Operational structures for the BSC have improved to the extent that the Advisory Groups are acting with significantly more independent initiative than was the case early in the project. Management tools have been developed with BSERP assistance and turned over to the Secretariat – in particular the BSIS and BSIMAP. Suggestions and recommendations for the structure of these management tools came out of the capacity building workshops and inter-calibration exercises, and were agreed upon or developed together with current and former BSC Secretariat members. It is not clear whether the Secretariat will have the means to fully utilise these tools.</td>
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Objective 2: Development of policy guidelines, legal and institutional instruments of pollution reduction from LBA and protection of ecosystems of the Black Sea and its coastal zone

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<th>Outputs / Indicators</th>
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| 2.1: Update/Renew the Transboundary Diagnostic Analysis (TDA) and Strategic Action Programme (Black Sea Strategic Action Plan, BSSAP) to account for the changes in the pressures on and the state of the Black Sea ecosystem. | **Transboundary Diagnostic Analysis**

The TDA has been both updated and renewed, reflecting the recent GEF ‘best practises’. The TDA has been published as a report as well as in a web-based version, accessible via the website of the BSC. Achievement for this output can be considered **satisfactory**.

The TDA though has been issued rather late. A preliminary first draft was available in autumn 2006; the final draft was issued in January 2007. A combination of factors is responsible for the delays, including the time needed by the PIU for planning, for identification of local experts and for issuing subcontracts; the time needed for acquiring the data (there were 66 contributing specialists); data being provided in various formats (despite prescribed templates) and with a varying quality (requiring extra checks). The 1\textsuperscript{st} phase BSERP activities, while not specifically focused on TDA/SAP development, nevertheless were supposed to provide deliverables that should have greatly aided in the TDA revision process, including a detailed study on emergent issues in the Black Sea region and their root causes (Phase 1 LFM 2.2); national and regional commitments by the countries and regionally to develop technical administrative and legal measures to control land based sources and other ‘emergent problems’ (2.3); and the development and adoption of process, stress reduction and environmental status indicators (4.2). At the start of the TDA effort, PIU staff viewed these and other 1\textsuperscript{st} phase deliverables to be inadequate for the TDA revision process, so a great deal of time and effort first went into acquiring improved data. The updated TDA differs from the 1996 TDA especially in... |
that information and analysis is now based on collected national, regional and external sources of data with clear policy outcomes, whereas the previous version was entirely based on expert judgments and indirect observations.

Although more and better data and information are now included, there are still several important gaps. For instance:

- There are uncertainties considering the source apportionment for nutrients, notably nitrogen. A tentative estimate indicates that the nitrogen loads carried with atmospheric deposition might be of similar order of magnitude as the nitrogen loads carried with the Danube River.

- There is limited information about trace metals and organic micro pollutants (including pesticides) in the Black Sea itself (water, sediment, and biota) as well as in the various pollution sources (like direct point sources, rivers and diffuse sources). The latter is mainly due to the fact that micro pollutants are still not routinely monitored by most countries; most information has been collected with the BSERP surveys (see also output 4.1 further below).

- Regional fish stock data is missing entirely, due to no agreements yet reached on a regional assessment methodology, and the data gathering to support it.

- The programmes of measures are rather generic and without cost estimates for the Black Sea Countries.

- Generally, the TDA contains more details for the north-western and southern parts of the basin, compared to the eastern sections (notably GE and RU). Most gaps merely reflect the still existing lack of sufficient data and information for the Black Sea Basin; and in the case of some countries, Russia in particular, a decision not to supply requested data.

**Hot Spots**

The BSERP Final Technical report indicates (pg 55) that of the 50 capital investment projects identified in the 1996 TDA, only 12 were completed 11 years later, with 2 no longer required, and work in progress on another 10 sites. The revised TDA, section 5, provides a hot spot analysis which goes into detail on these findings, noting that there are no expectations for government actions involvement 26 of the original hot spots. It would have been useful in the TDA to review and revise the hot spot designations, taking into consideration the actual monitoring/effluent data for the 50 identified hot spots (the 1996 SAP merely used generic denominators) and to consider areas with significant diffuse sources.

The hot spot analysis in the revised TDA provides no indication of additional sites that should be added. The PIU recognised there were serious flaws in the methodology used for the original hot spot analysis setting up an uneven ‘playing field’ amongst the 6 countries and ensuring that national issues were prioritised over transboundary issues. The PIU staff proposed an alternative methodology to the LBSA AG, however the AG was unable to reach consensus to agree or even comment on the proposed methodology. The Project Steering Committee then decided not to update the list of hot spots, and instead included just an assessment of the work undertaken to review the existing list. Agriculture has been added as a ‘primary suspect’ but without real quantification or prioritisation (e.g. whether livestock should be prioritised over the use of artificial fertilisers, for example).

Some of the TDA conclusions were considerably weakened through the process of revising the document based on national comments. While the review process increased country buy-in, in some cases it did so at the expense of providing a clear and accurate picture of the pressures on the Black Sea ecosystem. At one stage the TDA made it very clear that the Istanbul population constituted a greater load than all of the direct point source loads to the Sea combined, but the BSERP Steering Committee required that this strong statement be removed before accepting the
Opinions about the updated TDA vary, with some key stakeholders more satisfied than others. The project seems to have produced the ‘best available TDA’, taking into account the time and resources available, in combination with the available data and their accessibility. Despite the contributions by local experts, including participation in Technical Task Teams for each transboundary issue, some interviewees consider the TDA to be more of a BSERP product.

**Strategic Action Plan**

Achievement for this output can be considered **satisfactory**.

The SAP revision effort was carried out in the project 2nd phase, commencing after the TDA was completed in January 2007. The development process utilised a SAP Drafting Team including participants from each of the Black Sea countries.

The 2007 SAP revision was accompanied by the 1996 SAP implementation analysis conducted by the consultant hired by the Secretariat on behalf of the European Commission. The principle innovation of the revised SAP is the introduction of the concept of Ecosystem Quality Objectives for the Black Sea with a series of accompanying phased, step-by-step short/medium and long term targets. The reports (regional and national ones) were used at the process of drafting the new SAP and helped to confirm the deficiencies in implementation of the old SAP and the usefulness of the new methodology.

The SAP was being significantly revised and expanded during the evaluation mission. Given that it constitutes a continuing work in progress, it is difficult to render a full assessment on the SAP.

The technical draft version of the SAP reviewed by the evaluation team contains a ‘wish list’ of all together 107 short-, mid- and long-term targets, (later drafting based on country comments is apparently revising this number of targets downward). A high number of targets carry a potential risk of lacking focus. The realisation of 57 short term (1-5 years) targets may be considered as rather ambitious (the 1996 SAP has been typified as overly ambitious with very few of the targets being accomplished on time).

The format of the revised SAP differs from the original one issued in 1996. While the format reflects the latest GEF requirements, it does not meet one of the partner country expectations. Because of their inclusion of the first SAP in the legislation adopted in 2001, Ukraine has indicated it would prefer a comparable/compatible structure.

The technical draft included an Annex 5: Details of Agreed Measures at the National and Regional Levels (Including National Policy/Legal/Institutional Reforms and Investments) and their Implementation Mechanisms, which had not yet been developed. This section requires the input of the Black Sea Commission and the participating countries during the political process of SAP formulation.

There are different opinions about the importance of having an updated SAP. Some interviewees felt that many things still could be done with the SAP of 1996. One interviewee mentioned to have been more interested in digging deeper into the explanations why many of the original SAP obligations were not implemented (on time), instead of preparing an updated SAP.

It is not yet clear whether the updated Black Sea Strategic Action Plan will be ready for signing during the Ministerial Meeting scheduled for 31 October 2008. It has been reported that the continuing BSC/BSERP revision process, carried out while the final evaluation was in progress, has led to circulation of a draft revised SAP with initial favourable response from five of the six contracting parties. Significant revisions and amendments to the SAP draft have been submitted by the Russian Federation.
| 2.2: Adoption of the Protocol for Land-based Activities (LBA) (concluded and adopted as a draft in Phase 1) is facilitated through the national and regional negotiation process in order to ensure the adoption of the revised text at the Ministerial Conference (2007). | Achievements under BSERP can be considered satisfactory. While the Protocol is still not approved and moving through the process of ratification, this is essentially a problem of BSC and country decision making. It is not an issue of proper Protocol preparation but rather the unwillingness of some countries to move forward.

The BSC at its 11th Meeting (November 2004) decided to approve the proposed Draft Revised LBA Protocol, including its annexes, submit it for national consultations and possible adoption at the Ministerial Meeting to be held in 2007 (and postponed until March 2008).

More elaboration/consultation was deemed necessary regarding the annexes to the Protocol, so this was included in the 2nd phase of the BSERP. In August 2006, UNEP/GPA\(^1\) issued a 3rd version of the Draft Revised LBA Protocol, which included the comments that were received and discussed in the meantime. UNEP/GPA presented this version as the official document that the Black Sea countries may wish to use for the internal procedures for approval and the official diplomatic negotiations scheduled for 2007. In August 2006 (Russia) and in the period January - June 2007 (other BS countries), National Workshops were organised in support of capacity-building of national and local authorities responsible for the implementation of the LBA Protocol. Comments on the Draft Revised LBA Protocol were contained as an annex to the reports that were prepared by UNEP/GPA on the National Workshops. During the 18th Extraordinary Commissioners Meeting in February 2008, it was agreed to organise an expert meeting, tentatively in May 2008, to finalise the draft and conclude the preparatory work on the Draft Revised LBA Protocol.

A leaflet “land-based sources of pollution in the Black Sea. Protecting our sea” has been published in all six BS languages and in English.

As can be derived from the above summary of events, there has been a delay of at least more than one (August 2006) up to almost three years (November 2004) in terms of initiating the internal country procedures for approval of the Draft Revised LBA. The unfinished annexes of the 2004 Draft Revised LBA Protocol actually turned out to have opened the door for further discussion about the core text of the protocol as well. This situation has been mainly due to neither the BSC nor the PS having had a proper understanding about the procedures that commonly apply according to international practises; the year 2006 furthermore coincided with the staff changes in the PS.

Because of their advisory role, the BSERP project, including UNEP/GPA, are no longer active parties in the process (Inter-Agency Agreement (IAA) between UNEP/GPA and UNOPS. From a facilitation point of view, the project has performed well, including the continuation of the support by processing comments that were received throughout the years and the support for meeting scheduled for May 2008.

\(^1\) An Inter-Agency Agreement was signed between the UNEP/GPA Coordination Office and UNOPS in August 2003 to undertake the activities under component 2 related to the LBA protocol. |

| 2.3: Strengthen Integrated Coastal Zone Management in line with EU Directives and in testing concept for Best Practices for ICZM as developed by BSC/TACIS, to assure reduction of nutrients and hazardous substances from coastal areas into the Black Sea. | A series of 6 activities were envisioned in the ICZM output, including carrying out an inventory of ICZM legislation and policies, developing a regional strategy as part of the revised BSSAP, developing a feasibility study on a new ICZM Protocol to the Bucharest convention, implementing a pilot project testing ICZM concepts and disseminating the results of the pilot. There was also a specific activity included to assist in the negotiation process to establish a transboundary marine protected area for Vama-Veche (Bulgaria – Romania border).

The output has been satisfactorily achieved in terms of BSERP PIU deliverables. The BSERP has provided appropriate tools to the BSC for their continuing efforts to develop a regionally consistent approach to coastal zone management.

Implementation at the national level remains a work in progress. Two of the Black Sea Coastal States, Romania and Bulgaria, have national laws and |
management instruments in place specifically on ICZM. Two other states, Georgia and Ukraine have draft ICZM laws in hand, at early stages in the parliamentary review process. Turkey has a Coastal Law, but no integrated legislation covering multiple aspects of coastal zone management. The verifiable indicators for 2.3 anticipated that all six states would be developing ICZM strategies and legislation, with 3 countries having adopted and started to implement ICZM policies.

The ICZM pilot carried out in Turkey offers useful lessons in the development of ICZM. The pilot was carried out during a very compressed 11 month period in 2007. Starting the effort earlier would have enabled a longer development period as well as a chance during the project to assist in implementation and work towards wider replication in other areas. Even with the short duration, prospects for replication look promising. During the evaluation period the ICZM pilot team met with Turkish environmental ministry officials to review outcomes and push for replication elsewhere.

The demonstration project team noted there were already ICZM guidelines developed under the Mediterranean Action Plan (MAP) and utilised on the Turkish Mediterranean coastline. The MAP experience should have been reviewed as a guide and lessons learned for the Black Sea effort.

Notably, all six countries indicated their support for a regional ICZM protocol, and expectation that the BS ICZM Plan would be incorporated into the overall BSSAP. The BSERP Feasibility Study on an ICZM Protocol takes this support into account, but stands it up against the difficulties faced by the BSC with its other protocols: the Biodiversity Protocol (ratified so far by 2 of the 6 states) and the draft Land Based Sources Protocol, now in the midst of a protracted 4 year review and revision process. There has also been failure to move forward on a fisheries protocol on other binding instrument. The Feasibility Study suggests rather putting forward ‘soft law’ instruments: ICZM Declaration, Code of Practice and Action Plan.

The Vama- Veche cross-border marine reserve effort continues its slow development. A report developed in November 2007 indicates that the Romanian led-effort now includes joint efforts between Bulgaria and Romania to map the reserve. On the Romanian side, the Romanian National Institute for Marine Research and Development (INCDMN) is custodian of the marine reserve development effort – since 2004. An information centre has been constructed and a Junior Ranger Club has been created. In 2006 a Management Plan and Regulations for the Marine Reserve were submitted to the Ministry of Environment and Sustainable Development for approval.

**2.4: Agricultural policies reviewed for application at national level to limit export of nutrients and hazardous substances.**

Achievements under this output were **marginally satisfactory**. The reports published on the PIU DVD under the Agriculture component mainly comprise (country) reports on Livestock Numbers and Potential Nutrient/Organic Loads to the Black Sea from Riparian Countries. None of the reports deal with application of inorganic fertilisers or with hazardous substances originating from agriculture (notably plant protection agents). Neither do the reports contain a review of agricultural policies (also options for reducing nutrient emissions from livestock breeding are not addressed). The “Case study on calculating cost-effective measures to tackle nutrient pollution from the agricultural, municipal and industrial sectors in the Black Sea” published under Objective 3.1 (see further below) contains rather generic information that is not really tailored to the Black Sea Basin countries.

The LogFrame mentions in terms verifiable Indicators / Results: "National experts are trained to introduce Agricultural BAP in their countries. Representatives from relevant ministries, municipalities and local Governments are trained in the development and implementation of sectoral policies and NAPs”. These indicators were not realised, as training on agriculture BAPs were not carried out.

It is primarily a shortcoming in the project design that a project focused on nutrient reduction focuses so little attention to the most significant land-based source of nitrogen loading – agriculture.
The industrial/transport and municipal component included 4 sets of activities including the establishment of inventories of industrial, transport and municipal pollution sources, developing criteria and then revising hot spot identification, reviewing policies and legislation, and organising workshops to introduce BAT and financial support mechanisms.

Achievements under this output are deemed to be marginally satisfactory. The Project team was limited in its achievement in particular by the difficulty in getting reliable data from the countries. Initial expectations were that the BSC Secretariat would provide useful data, yet data quality checking was a problem and some data was purposefully withheld. Secretariat staff and some of the responsible country ministries insisted that their industrial point sources discharge data was confidential and could not be viewed or utilised by the project Team. As clearly stated by the BSERP PIU, the information provided through this exercise, and included in the BSIS, is deeply flawed and serves mostly to over-report the extent of pollution loading from the Danube.

The updated TDA contains an assessment of progress made in addressing the original list of 50 ‘hot spots’ identified in the first TDA of 1996 in terms of undertaking the capital investments originally identified. The “Case study on calculating cost-effective measures to tackle nutrient pollution from the agricultural, municipal and industrial sectors in the Black Sea” published under Objective 3.1 (see further below) contains a chapter “Case study on nutrient reduction in industry” that seems to have been written more for the Danube Basin rather than the Black Sea basin.

Data were provided from each of the countries on industrial and municipal dischargers above 1000 m$^3$ daily discharge. This data suggests that nutrient loading from industrial and municipal sources directly discharging into the Black Sea are equivalent to only 2% of river borne DIN and 13% of river-borne PO$_4$ - Phosphorus loading into the Sea. As noted by the BSERP in its report, these loading figures seriously under report possible other coastal pollution sources - for instance data on the discharge amounts from Istanbul into the Bosporus are not included. The BSERP in its final report notes that much of the data were weak and full of omissions, noting that there remain problems in the country monitoring and analytical quality assurance programmes. Improved QA/QC for load estimation were recommended. It remains clear that the Black Sea countries are quite reluctant to report and share data concerning their industrial and municipal discharges directly into the Black Sea and most of its tributaries.

No data were compiled concerning pollution loadings from the transport sector.
2.6: Legally binding Document on Fisheries finalised and proposals for establishment of fisheries-free zones and marine protected areas developed

The Fisheries component included 5 separate activities: assisting the BSC on a legally binding document (LBD) for fisheries protection, carrying out a study on sensitive habitats and nursing grounds – with recommendations on fisheries – free zones and MPAs, annexes to the Bucharest Convention ‘Biodiversity’ Protocol, elaborate stock assessment approaches on migratory fish, and to organise a regional workshop on regional stock assessments.

A working draft for the LBD was developed. Its formulation involved consultations with representatives of Ministries of Foreign Affairs from all countries at a special meeting in Sile (Turkey, 2003). The draft LBD on Fisheries was then approved at a regular meeting of the BSC (2004). Since then, the effort to develop a legally binding document (LBD) on fisheries has not moved forward. One of the critical issues in the last several years has been that with Romania and Bulgaria now EU members, it is the European Union that must negotiate fisheries treaties on behalf of the member states. The EU is not a party to the Bucharest Convention (despite its expressed interest to join), so the Commission is not in a position to serve as a negotiating forum for fisheries, until such time as the EU becomes party to the convention.

The BSERP together with BSC Secretariat collected maps from each of the countries, together with supplementary reports, setting out nursery and spawning grounds. This compiled information is planned to be added to Annex IV of the Biodiversity Protocol.

The TDA includes a generally well-developed section on fisheries, including a causal chain analysis on the decline of commercial fish species / stocks. It is worth noting that there are serious omissions in the data – for Russia provided no data on seafood production consumption and employment, while annual catch of various species typically excluded some countries from the data (see TDA pg 72). Evidence reported in the TDA and from the research cruises in the western shelf hint at a recovery in marine ecosystems stemming from a reduction in nutrient loadings after the post-Soviet economic upheaval. The trend data for fisheries indicates an increase in sprat and anchovy catch, although other key commercial species such as Whiting, horse mackerel and mullet remain depressed.

For the TDA, the BSERP utilised information from fishing fleet statistics and fish landings. The BSERP team has made clear that the information received from the countries on fisheries is deeply flawed. There is no common methodology used to report landings, weight of catches goes underreported, and no consideration is given to the extent of illegal fishing, (viewed as a likely considerable percentage of total catch). As noted in the BSERP final technical report (pg 48), "The reality is that we are no nearer to identifying sustainable catches for the Black Sea than we were a decade ago".

Achievements in this output were unsatisfactory, however most of the responsibility for this lack of progress rests with the partner countries, not with the BSERP team.
Objective 3: Development of economic instruments and promotion of investment opportunities in coastal zones for pollution control and protection of Black Sea ecosystems

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<td><strong>3.1</strong>: Overall economic analysis carried out analyse national policies and programmes and cost-effectiveness of measures in respect to reduction of nutrients and hazardous substances (results of the analysis are incorporated in the revised TDA - Activity 2.1.1).</td>
<td>The achievements with respect to this output are marginally satisfactory. Black Sea country national policies and programmes have not been analysed in consideration of cost effectiveness in reducing the discharge of nutrients and hazardous substances. Instead, a generic study of potential measures to reduce these pollutants was developed. The study appears to have been ‘borrowed’ or at least built largely from activities within the UNDP/GEF Danube Regional Project. The deliverables included three “pilot” studies that were submitted to the BSERP by its consultant, focusing on nutrient discharge reduction measures for farmers, municipalities and fertiliser factories. These studies are not specific to any particular facilities or even to the Black Sea region, although some Danube and EU information is included for Romania and Bulgaria. The recommendations provide little practical guidance for the Black Sea countries, as they are a compilation of possible measures which would need to be selected based upon the specific considerations for any particular municipality, farm or fertiliser plant. The generic nature of this information is unfortunate, in particular because 5 of the 6 participating countries came through a major economic transformation over the previous decade that decimated their agricultural production. As this sector of the economy rebuilds, there are opportunities to establish new management measures that are more environmentally benign, yet they must be built upon an understanding of the conditions in the countries, and utilising real world examples. There is no indication that any of the information from the reports has been translated and disseminated, so it is at this point of negligible utility to farmers, municipalities and the fertiliser industry in the Black Sea basin. An analysis has been included in the TDA that provides background data on the socio-economic situation amongst the 6 countries in the basin. A cost-effectiveness analysis of existing national policies to reduce nutrient and hazardous substance pollution was also an expected output, but not achieved. Such analyses are complex and expensive to carry out, requiring use of a source apportionment model, validated by monitoring data. The budget established for output 3.1 was not sufficient, nor was the quality of data available to effectively carry out this analysis.</td>
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3.2 Investment programme for nutrient pollution/load reduction measures in the Black Sea coastal zones is revised for further submission to the IFIs and bi-lateral donors.

Achievements under this output can be considered satisfactory. The original 2nd Phase ProDoc included preparing regional investment programmes for municipal, industrial and other infrastructure projects, a donor conference in 2005, and further development of interactions between the private sector and GEF. Recognising that regional investment programs and a donor conference duplicated efforts of the DABLAS Task Force, the Logframe and PIP for Phase 2 replaced these with a) country- specific guidance notes on Russian and Ukrainian water utility financial analysis, and b) preparation of two pilot water utility investment projects: Mikolaiv W&S DABLAS Pilot and Yalta W&S DABLAS Pilot.

The BSERP has successfully assisted the Mykolayiv City and Utility to develop a proposed short term investment program (STIP), incorporating recommendations for financial and operational performance improvement. The BSERP support has built upon initial work from the EC DABLAS Project Broker and forms part of the DABLAS Task Force Pipeline. The final report of activities was submitted in January, 2008.

The same consultant to BSERP provided assistance in developing the Crimea Regional W&S Investment Project. Their results, finalised in January 2008, include a technical, financial and institutional review of the Crimean Water Supply and Sewerage Sector, a short term investment project (STIP) proposal (focused on Leninskiy District), and TOR for further technical assistance were developed. It has been indicated to the evaluation team that the Government in the Crimea region (ARC) has requested that $5 million funding from the stalled World Bank project: Crimea Coastal Zone Management Project be redirected to the Crimea Regional water and Sewerage Investment Project. No response from UNDP GEF has been provided concerning this request,

The investment assistance, including STIP development, appears well conceived and carried out. Both of the assignments build from the original DABLAS priority list. It is noted that both projects are focused on basic upgrading of wastewater treatment and sewerage systems and priority water system improvements. Neither project, at this stage, includes planning for technologies and techniques specifically focused on the reduction of nutrient discharge.

The investment programme under BSERP was not coordinated with the World Bank nutrient reduction facility, despite the periodic convening of stock tacking meetings between these two parts of the Danube – Black Sea Strategic Partnership. It is clear that the World Bank developed its project investment pipeline without consideration of the BSERP TDA and other deliverables.

Objective 4: Development of operational systems for monitoring, information management and research under the Black Sea convention.

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<td>4.1 The Black Sea Integrated Monitoring and Assessment Programme (BSIMAP) is operational, providing tools and indicators to evaluate changes over time in the coastal and marine environment.</td>
<td>Achievements in the BSIMAP effort can be considered satisfactory. Manuals have been prepared for sampling and analysis of: nutrients, chlorophyll, phytoplankton, zooplankton and zoobenthos. The manuals also contain procedures for quality management. The manuals have been discussed, tested (including training) and approved in workshops in which representatives of all countries participated. Pilot monitoring exercises (PMEs) were undertaken by 5 countries (BG, GE, RO, RU, UA) in two rounds. The sets of analysed parameters were not the same for all countries. Not all countries appear to have applied the sampling and analysis methods prescribed in the abovementioned manuals. The results are reported in separate reports prepared by each of the countries, with varying content (i.e. the Russian report is incomplete). None of the reports contain a discussion/reflection of the PME in terms of ‘lessons-learned’ for the BSIMAP. BSIMAP is getting mature, meanwhile containing standardised sampling,</td>
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storage, analytical techniques, and assessment methodologies and reporting formats for most parameters. There are clear intentions concerning quality management procedures, including proficiency testing. A major gap is that agreed methods for sampling and analysis of micro pollutants in water, sediment and biota are still lacking. Furthermore, there are no agreed sets of environmental indicators yet. Activities in the Advisory Groups concerning development of indicators commenced in 2003, but are still not finished. For the hydrobiological parameters there are furthermore no complete lists with Black Sea species available yet. Activities for compiling such list have been started during the project, but are not yet completed.

BSIMAP is not fully operational, since the agreed monitoring and assessment programmes are not yet implemented by all BS countries. A number of factors apply. Getting sufficient finances for a BSIMAP compliant monitoring programme seems to be a problem in all countries. The capacity for laboratory analysis of micro pollutants is not yet fully developed in all countries, due to either lack of equipment or of sufficient expertise in the analyses. Some countries also do not have the appropriate microscopes required for analysis of several hydrobiological parameters. The mandatory requirements for national monitoring programmes are not always in line with BSIMAP. The organisational arrangements (which institute, laboratory will conduct which part of the monitoring) are not yet settled in all countries. These factors have been mainly out of the reach of BSERP.

**VTOPIS**

The VTOPIS (Vessel Traffic Oil Pollution Information System) software has been installed on computers in the Bulgarian Marine Administrations in Burgas and Varna in the autumn of 2007. The Marine Administrations are said to use the system on a daily basis and to be happy with the system.

The VTOPIS software is not ‘plug-and-play’, meaning that it is not immediately operational when installed on computers of maritime administrations in other countries. Required adjustments include: localised electronic maps/charts of the harbours and coastal area, localised statistics on prevailing current and wind directions, and general integration with the existing systems, like the VTMIS (Vessel Traffic Management Information System). According to the developer, the key for exchange is in the underlying database. As long as data are stored in compatible formats (templates), administrations have means of exchanging data such that they more easily can be processed mutually. Here, the ESAS AG can play an important role.

The perspectives on replication of VTOPIS in other countries are uncertain. The discussions during AG ESAS meetings in the last years show that signing of an agreement on implementation of a centralised system will be difficult due to political and technical issues. The final VTOPIS meeting in October 2007 was attended by representatives of Bulgaria and Romania only. The Romania Naval Authority is enthusiastic about VTOPIS, notably the backtracking module, and is interested in introducing it in their own systems.

With respect to oil spill prevention and remediation, in addition to the VTOPIS demonstration, a number of coordinating activities were carried out during the 2 project phases: sensitive area have been mapped, a Contingency Plan has been developed, and dry run exercises are implemented on a regular basis. During accidents in the Kerch Straits in 2007, the contingency protocols and communication routes were utilised and considered effective.

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2 An unintended side-effect of the PME has been that it actually provided some water quality data for the year 2006 for Ukraine. Due to lack of finances, the Ukrainian Scientific Centre Ecology of the Sea (UkrSCES) was not able to perform their routine monitoring work, so otherwise there would not have been any data for 2006 at all.
GIS, mapping and remote sensing developed to support the activities of the BSC and implementation of the BSSAP.

The major part of the development of the BSIS by BSERP took place during Phase 1 and the initial stages of Phase II. The original members of the PS were not able to clearly outline the expected outputs of the BSIS. After having adjusted the system several times for a series of (sometimes contradictory) requests, the team decided to put the system development on hold. During Phase II BSIS has been populated with data until 2006, prepared it to become accessible via web-based Intranet and added mapping facilities.

The structure of the current BSIS very much reflects the structure of the SAP of 1996. Data are entered and can be retrieved using templates that follow the numbered articles of the SAP. The current Technical Draft of the revised SAP is structured quite differently; possible ramifications for the BSIS have not been made.

The new Secretariat staff did not start actively using the BSIS for their activities (like for compilation of annual topic reports). The current Secretariat PMA officer mentioned that the expected outputs are not yet defined, such as indicator-based reporting. The system has not yet been made accessible to other bodies, like the Advisory Groups or Focal Points; they merely provided their data in the required formats.

The BSERP mid term review indicated: “The BSIS format and templates are very good, although more effort is needed now to provide help aides and training to the BSC PS and other users.” Up until the last weeks of the project this remained still an issue. The BSIS software was installed on the server of the BSC Secretariat only in April 2008, at which time a full set of the documentation was prepared and training exercises took place (both for database management, and database users).

Recognising that the BSIS was already essentially developed by 2004, it would have been very useful to put this system to use as the information repository for both the BSERP and the BSC. It is very unfortunate, and a significant procedural shortcoming that the training and transfer for BSC use took another 4 years. It is recognised that part of the delay stemmed from differences of opinion with previous members of the BS Secretariat on how the database should be configured, and also there were issues of data sensitivity that previous Secretariat management indicated required separate database development. The use of incompatible information systems, and the lack of effective data sharing greatly impeded both BSERP and BSC performance.

<table>
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<tr>
<th>4.3: Research Programme designed and implemented to assess input of nutrients and hazardous substances in the Black Sea</th>
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<tr>
<td>The results of the research programme can be considered <strong>satisfactory</strong>.</td>
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<tr>
<td><strong>Research cruises</strong></td>
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<tr>
<td>In addition to the research cruise of Phase 1, three more cruises have been organised under Phase 2 (2004, 2005, and 2006). The research cruises covered various components of the Black Sea ecosystem, including water, sediment, benthic communities, Phyllophora (including the Phyllophora fields in Odessa Bay) and other macrophytes, phytoplankton and zooplankton. Especially the opportunity to conduct measurements in the open sea has been appreciated very much (most national surveys are confined nearer to their coasts). The cruises had a strong focus on the northern and western parts of the Black Sea, with the third cruise extending some of the measurements to the south. This leaves the eastern part towards Georgia and Russia less studied.</td>
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<tr>
<td>The draft Summary Report: BSERP Research Cruises and Pilot Monitoring Activities 2003-2006 (published on the PIU 2008 DVD) contains a chapter with a critical overview of lessons learned. A number of issues are addressed: the 2005 expedition was hampered by problems with the vessel and a storm; the post-cruise costs of processing/analyzing samples collected during the cruises were not sufficiently well accounted for in the budgets (sometimes leading to no or late delivery of reports); some of the scientists delivered high quality reports on time, but there were also others who were very late in delivering; there has been relatively little cross-fertilisation of results between different scientists; the ISG wished to pursue more fundamental research, investigating energy and nutrient <strong>processes</strong>.</td>
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</table>
transfer between different trophic levels, while UNDP-GEF was interested primarily in the ‘environmental status’.

Numerous (raw) data have been obtained with the research cruises that, as just mentioned, only partially have been integrated. The Summary Report (cited above) has not been completed. A long awaited report on the cruise findings from the chair of the ISG was published in January 2008.

Some major results of the research cruises were incorporated into the updated TDA. Generally, the scientific Black Sea community has been nourished by the expeditions, leading to a better understanding of the very complex Black Sea ecosystem, including eutrophication phenomena. Some of the results of the cruises could be used to indicate some improvements in the status of the Black Sea ecosystem.

Modelling

The Kamchiya River pilot project comprised the modelling of nitrogen and phosphorous emissions in this Bulgarian River. The model developed under the Kamchiya River pilot project is rather straightforward and completely contained in Excel spreadsheets. It uses several generic coefficients for estimating emissions in case no actual load data are available. Because of limitations in the available monitoring data, the comparison with the actual river loads also had to be approximated with several artificial assumptions.

Generally, there is no lack of such nutrient models, varying in their complexity and therewith in their demand for data required for running the models. It is outside the reach of the evaluation to assess the overall robustness of the model developed under the Kamchiya River project. It seems to be a useful tool for some first tentative order of assessments. But its performance is not yet sufficiently known to decide whether it could be proposed as the model to be used by the Black Sea Basin countries.

Atmospheric deposition

A pilot study was implemented in Phase I within ISG activities; however, it was decided by the project Steering Committee not to continue in Phase II, since there was not enough funding to make it properly, and a very general and report-only-oriented activity was not viewed to be useful.

Scientific conference

BSERP facilitated (also financially) the First Biannual Scientific Conference: Black Sea Ecosystem 2005 and Beyond. May, 2006. The Second Conference in 2008 has been co-financed by BSERP.

Objective 5: Strengthening of public participation in environmental protection through access to information, stakeholder training and awareness raising and implementation of community actions (small grants programme)

<table>
<thead>
<tr>
<th>Outputs / Indicators</th>
<th>Results/ Impacts</th>
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<tbody>
<tr>
<td>5.1: NGOs structures and activities reinforced though support for institutional development and community actions in awareness raising, training and education on the issues related to the management of nutrients and hazardous substances.</td>
<td>Achievements for this output and set of activities can be considered satisfactory. The LogFrame indicates four activities, including development of an NGO registry, support to NGOs to participate in periodic forums, training on coastal environmental management and support for translation and dissemination of publications. NGO registries were developed for each of the six countries. They appear to be quite comprehensive. They are available as six separate files. The registries were not periodically updated, nor were they compiled into a database / address book that could have served as a regular list for sending out information and informing of upcoming events. During the BSERP the Black Sea NGO Network was created and came to serve as the key regional NGO liaison for the BSERP and BSC. The network has demonstrated a professional approach and has been able to independently obtain additional grant funding, providing the hope and expectation that it can be sustained after the BSERP is concluded. A key</td>
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question for NGOs in the future will be the extent of their participation in subsequent Black Sea Commission meetings. The BSC has no funding capacity to assist with NGO participation. It can be assumed that the Network will utilise its Turkish affiliates to enable a low cost continuing presence.

The BSERP team made real efforts to involve NGOs in the many activities they carried out under the project. In particular, NGO’s participated in the SAP development process, and played key roles in public participation and small grants efforts. The effort to engage NGOs was enhanced through development of a BSERP NGO Work Plan, containing activities and timetables.

In June 2006, 30 NGOs from all six Black Sea Coastal countries participated in an NGO workshop sponsored by BSERP, to identify and prioritise NGO activities in the region and identify NGO capacities and skills.

NGO training sessions were held in all of the Black Sea countries except Russia during 2007. The training workshops helped to: promote environmental education, raise awareness on environmental issues in the Black Sea region, improve NGO networking and improve communications skills.

Two publications received translation assistance support from the BSERP: a book on the comb jelly fish (Mnemiopsis), and a book on Black Sea Ecology.

5.2: Community actions for awareness raising and environmental protection implemented with funding from GEF “Small Grants Programme” targeted specifically at the support/participation in the management of nutrients and hazardous substances and protection of coastal zones and marine ecosystem.

The small grants output was highly satisfactory. Two grant sessions were run, the first during Phase 1, including 17 projects carried out in 2003. The second series was carried out in 2006/2007 and involved 36 projects in total distributed fairly evenly across the 6 Black Sea Coastal Countries. These 2nd phase projects received awards of between $4900 and $10,720, with a total 2nd phase allotment of $308,802.

The 2nd phase portfolio was subject to a separate evaluation, which was carried out in February and March, 2008. The evaluator’s assessment was that virtually all of the projects achieved success, and the effort was especially effective in general awareness raising. NGO’s used their funding efficiently; with tens of thousands of pages of information materials published and disseminated more than 100 public events, and dozens of local community actions triggering hundreds of media reports. The evaluator further indicated that while only a few of the projects were targeted towards specific environmental impacts (such as beach cleanups) the totality of the effort laid the groundwork for measurable environmental improvement in the future.

The involvement of the CTLs in the small grants administration was considered very useful, especially in the initial launching of the effort and screening of applications, and then in the monitoring of the effort. It has been indicated that there were some issues raised by the participants concerning the rapid and brief project period, the small amount of grant money available, and some problems with bank transfers.

5.3: Public information on reduction of nutrients and hazardous substances, their effect on the Black Sea ecosystem, and the recovery measures are disseminated to the public at large (i.e., by means of the Communication Strategy, Educational

Achievements under this output can be considered satisfactory. This output included 6 activities: develop a communications strategy for the BSERP and BSC, launch and administer public information and awareness raising campaigns, develop press materials, support environmental education and assist in developing and producing information material on the management of coastal zones and marine ecosystems. There was also to be an evaluation of the effects and impacts of the communications programme at the end of the BSERP.

The overarching effort was put into Black Sea Day. In particular, effort was geared up for the 2006 Black Sea Day, which also commemorated the 10th year anniversary of the BSSAP. The 2006 Black Sea Day was a major success: with over 200 events and activities, media coverage reaching an
Programme, Public awareness campaigns, media coverage). Audience of 8 million, significant in kind contributions from NGOs, local companies and media and the distribution of 27,000 branded items. The 2007 Black Sea Day received somewhat less support and exposure but nevertheless continued to successfully draw attention to Black Sea ecosystem and water quality issues.

An excellent education study pack has been developed during the BSERP Phase 1. Phase 2 support provided an update of the design and content and creation of an interactive CD. Unfortunately, the Study Pack remains a great resource that is largely untapped. There are no indications that school systems across the region have utilised the Study Pack as part of their science curriculum. It is also in need of further support to translate into other regional languages and to continue to update and expand its contents.

With the help of Coca Cola (its Every Drop Matters project with UNDP) a 22 minute BBC TV documentary was developed: “The sea that Nearly Died”. The documentary was shown on BBC World in May, 2007. The documentary provided a well-developed laymen’s look at the current situation in the Black Sea, and the positive signs of recovery.

One of the expected deliverables within this output was a communications strategy. This should have been fully developed during Phase 1 inception and then recalibrated following the revised focus of activities during Phase 2. A strategy was developed in 2003 by the Public Participation Specialist (Staff Member) of the PIU and widely discussed at one of the SCMs. However, it was not implemented in Phase I. Effort was then put into this activity in Phase II, with a revised strategy developed and implemented from June 2006.

The involvement of Coca Cola in supporting promotional efforts for the Danube and Black Sea basin constitutes a useful public private partnership. The Every Drop Matters programme for Coca Cola is a multi-year effort that promises as much as $500,000 to the Black Sea Commission for public awareness raising efforts. Inexplicably, the BSC has not followed up to cement its partnership with Coca Cola and the financial support for the Black Sea is in jeopardy. Certainly there must always be caution and a clear set if guidelines for private sector involvement in funding environmental awareness campaigns, however the precarious situation of BSC future financing suggests that it is critical for the Commission to look to a variety of non-traditional sources if it has any hope of continuing to build public awareness.

The project included an English web site, yet did not include any translation of that site, nor were there national sites. This significantly restricted the web audience for this project. Given that the project employed full time CTLs in each country, and had a sizeable NGO small grant budget, it should have been possible to do more with respect to local language web sites.

### 3.3.2 Country ownership

The major involvement of the participating countries has been through environmental ministries and their subordinate bodies. These Ministries rarely have responsibility for resource issues such as fisheries, mining and agriculture, so activities with the greatest impact on water quality are largely outside of their control. This situation has been recognised in the BSERP and other GEF IW projects. The solution has been to push for the countries to set in place interministerial coordinating mechanisms. This effort has made minimal headway amongst the Black Sea countries. The project results concerning Inter Ministerial Coordination Mechanisms (IMCM) are contained in a rather generic report that does not elaborate on Ukraine or Russia yet contains sections on Serbia and Moldova, while Romania and Bulgaria merely get mentioned as having IMCMs in place. On a positive note, the interactions with Georgia seemed to have encouraged officials to assign the role of environmental coordinating body to the State Commission on Water Supply and Sanitary Policy Development.
Some interviewees labelled outputs like the updated TDA as being more of a BSERP product than something of high priority to the countries. This could be considered indicative for the overall perception of the project. While generally being highly appreciated for its facilitation, like organising and co-financing international meetings and research expeditions, not necessarily all of its activities and envisaged outputs received similar interest. Representatives interviewed in Bulgaria and Romania furthermore explained there was less interest in BSERP because a substantial part of its envisaged activities and results already are covered by these two countries as they strive to meet EU requirements, especially the Water Framework Directive.

There has been a noticeable lack of progress made on the BSSAP (1996). Subsequently, the six states have had difficulties reaching consensus on biodiversity, land based sources and fisheries protocols. There are still major problems in the sharing of data, especially concerning point sources of pollution, and in reaching agreements on monitoring methodology. Even the methodologies for determining hot spots are still called into question, 12 years after the first hot spot designations. Other country ownership issues arise with respect to the lack of Commission follow through on most of the recommendations for institutional strengthening that were developed with BSERP support, including in its exit strategy. Taken together, the lack of progress and follow through points to a decided lack of country ownership and interest in working jointly to protect and improve the Black Sea ecosystem. This lack of country ownership poses serious risks to the future effectiveness and sustainability of the Black Sea Commission.

It is premature to assess the possible BSERP long term impacts on the policies and strategies of the countries. Some key outputs, like the revised SAP and LBA Protocol, were still in the process of being completed while preparing this evaluation report. The possible adoption of the revised SAP and LBA Protocol during the Ministerial meeting scheduled for October 2008 would be a major positive project outcome, and evidence of increasing country ownership and commitment.

### 3.3.3 Stakeholder and public awareness.

It is difficult to gauge the level of awareness in each of the countries concerning project outputs due to the wide ranging variety of these outputs, and the close relationship between BSERP outputs and BSC outputs. No specific activities have been undertaken to actually gauge stakeholder awareness of project outputs.

Within a fairly narrow band of government ministry officials involved in marine environmental protection for the Black Sea, there can be assumed a generally good awareness of the BSERP efforts on the revised TDA and SAP. Within the marine science community, there was an appreciation for some of the scientific efforts, including the joint research cruises. For NGOs, the small grants effort was widely known and appreciated. For the general public, the Black Sea Day (especially 2006) can be considered successful in calling attention to Black Sea issues. Activities like the National Workshops on the LBA-protocol and the stakeholder analysis among 42 stakeholder groups, plus the involvement of the Advisory Groups made a broader audience aware and acquainted with the project’s results. Key stakeholders from the private sector, including industry and agriculture, were not specifically engaged during the project implementation.

### 3.3.4 Cost-effectiveness

The BSERP has taken 6 years and cost GEF $ 10.3 million. An additional $9 million is the estimated co-financing, although the participating countries have not estimated their in-kind contribution at project end, so these numbers are speculative at best. As noted in the above sections discussing each of the project outputs, there is a decided lack of success in meeting the verifiable indicators of environmental and policy reform progress as a result of this project.
3.3.5 Sustainability of project impacts

Sustainability is dependent on the countries continuing to take joint and separate actions to reduce nutrient and other pollution loading and to enhance fisheries recovery. Country buy in has been and will remain a major point of concern. Current financial contributions to the BSC merely allow for running a Permanent Secretariat with several staff members, and without funding for expert/advisory groups, further joint research and monitoring efforts or public awareness activities. Furthermore, the lack of progress made on the first SAP and the slow pace of approval and ratification of the Biodiversity and LBA Protocols suggest that agreement and then implementation of common policies are likely to remain very difficult.

<table>
<thead>
<tr>
<th>Objective 1. Support the consolidation and operation of institutional mechanisms for cooperation under the Black Sea Convention</th>
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<tr>
<td>Outputs / Indicators</td>
</tr>
<tr>
<td>1.1: Operational structures and management tools of the Black Sea Commission further developed and functioning.</td>
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<tr>
<td>1.2: Black Sea Project Implementation Unit of the BSERP (BSERP-PIU) fully operational for implementing Tranche II of the Project.</td>
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<tr>
<th>Objective 2: Development of policy guidelines, legal and institutional instruments of pollution reduction from LBA and protection of ecosystems of the Black Sea and its coastal zones.</th>
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<tr>
<td>Outputs / Indicators</td>
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<tr>
<th>2.1: Update/Renew the Transboundary Diagnostic Analysis (TDA) and Strategic Action Programme (Black Sea Strategic Action Plan, BSSAP) to account for the changes in the pressures on and the state of the Black Sea ecosystem.</th>
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<tr>
<td><strong>Transboundary Diagnostic Analysis</strong></td>
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<td>Recognizing its deficiencies, in particular with respect to data accuracy and the exclusion of potentially important pollution sources, such as Istanbul, the revised TDA still represents a significant improvement over the previous TDA and provides a clear and up to date consideration of the pressures and measures of concern to the Black Sea ecosystem. The text has received favourable comments from the Commissioners, Secretariat and other key stakeholders and can be expected to provide the Commission and participating governments with a useful tool for identifying cooperation priorities.</td>
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<tr>
<th>2.2: Adoption of the Protocol for Land-based Activities (LBA) (concluded and adopted as a draft in Phase I) is facilitated through the national and regional negotiation process in order to ensure the adoption of the revised text at the Ministerial Conference (2007).</th>
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<tr>
<td><strong>Strategic Action Plan</strong></td>
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<td>The Technical Draft SAP was compiled during the later stages of the project, and is now being revised and further jointly developed by the BSERP and BSC. A consultant working for the Black Sea Commission has been detailed to make revisions, supported by a full-time BSERP PIU staff member. There have been extensive negotiations with all of the countries, and major revisions to the draft based upon country comments. Nevertheless the current document bears a strong similarity to the Technical Draft SAP produced in December 2007. The PIU has high expectations that an updated SAP will be signed by all parties later this year.</td>
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<tr>
<th>2.3: Strengthen Integrated Coastal Zone Management in line with EU Directives and in testing concept for Best Practices for ICZM as developed by BSC/TACIS, to assure reduction of nutrients and hazardous substances from coastal areas into the Black Sea.</th>
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<tr>
<td>The sustainability of ICZM efforts in the region has benefited from the BSERP efforts together with the ECBS (EU) project. The ICZM pilot in Turkey is creating interest there for additional coastal zone planning activities and with the help of the ECBS there is an ICZM law under consideration now in Georgia. Based from interview comments of several Black Sea Commissioners, there are likely to be difficulties getting coastal zone protocol through the Black Sea Commission at this juncture, a draft Regional ICZM Strategy document was approved by the Commission in 2004.</td>
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<th>2.4: Agricultural policies reviewed for application at national level to limit export of nutrients and hazardous substances.</th>
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<tr>
<td>While the achievements under this agricultural output were minimal, there are quite a number of important agricultural management targets in the draft SAP, with 5 of the countries having so far agreed.</td>
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<tr>
<th>2.5: Industrial/transport and municipal policies and legislation reviewed for application of BAT (best available techniques, including cleaner technologies) towards reduction of nutrients (N and P) and hazardous substances.</th>
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<tr>
<td>There were no achievements under the industrial/transport and municipal policies effort that are likely to have a sustainable impact, however without discharge data, it was impossible for the PIU to determine issues such as cost effectiveness and which industries should be prioritised.</td>
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2.6: Legally binding Document on Fisheries finalised and proposals for establishment of fisheries-free zones and marine protected areas developed

There were no achievements under the fisheries output that are likely to have a sustainable impact. If the BSC refuses to accept the European Commission as a member, the BSC is unlikely to play a major role in fisheries policy for the region.

**Objective 3: Development of economic instruments and promotion of investment opportunities in coastal zones for pollution control and protection of Black Sea ecosystems**

**Outputs / Indicators**

**Sustainability**

**3.1:** Overall economic analysis carried out analyse national policies and programmes and cost-effectiveness of measures in respect to reduction of nutrients and hazardous substances (results of the analysis are incorporated in the revised TDA - Activity 2.1.1).

Sustainability of Objective 3 outcomes concerning economic development and investment opportunities is unlikely. The project’s outputs were rather shallow to start with. Furthermore, there is a tendency in GEF IW projects to pay ‘lip service’ to cost/benefit analysis and the use of economic tools, however, the finances set out for these studies and activities is meagre, there is insufficient linkage to available investment finance, and the project identification efforts rarely extent into full feasibility studies – so they are of limited use to IFIs. The generic nature of the information developed suggests that it will be of marginal utility to the Black Sea Countries in the future.

**3.2** Investment programme for nutrient pollution/load reduction measures in the Black Sea coastal zones is revised for further submission to the IFIs and bi-lateral donors.

There can be expected real, tangible and sustainable achievement as a result of the efforts to assist with feasibility studies for Mykolayiv City and Crimea regional Water and Sewerage Investment Project. These are both firmly within the DABLAS pipeline and supported by the Ukrainian Government.

A major challenge for the Black Sea Commission will be able to disseminate and yield upon such pilot projects.

**Objective 4: Development of operational systems for monitoring, information management and research under the Black Sea convention.**

**Outputs / Indicators**

**Sustainability**

**4.1** The Black Sea Integrated Monitoring and Assessment Programme (BSIMAP) is operational, providing tools and indicators to evaluate changes over time in the coastal and marine environment.

BSIMAP holds out promise for sustainability. The standardised sampling, storage, analytical techniques, and assessment methodologies and reporting formats have been developed and agreed. However, BSIMAP is not fully operational, since the agreed monitoring and assessment programmes are not yet implemented by all BS countries. Full implementation of BSIMAP by all countries is not something to be expected in the short term.

Sustainability and replication of VTOPIS are uncertain. Signing of an agreement on implementation of a centralised system is a difficult issue due to political and technical issues. The Romania Naval Authority is enthusiastic about VTOPIS, notably the backtracking module, and is interested in introducing it in their own systems.

**4.2:** Black Sea Information System including tools for GIS, mapping and remote sensing developed to support the activities of the BSC and implementation of the BSSAP.

The formal turnover of BSIS to the BSC Secretariat took place after the evaluation, so training and operational manuals are only now in the hands of the Secretariat staff. It can be assumed that the database will be utilised by the Secretariat, especially for updating of information for the TDA and SAP.
### 4.3: Research Programme designed and implemented to assess input of nutrients and hazardous substances in the Black Sea

Some major results of the research cruises were incorporated into the updated TDA. Generally, the scientific Black Sea community has been nourished by the expeditions, leading to a better understanding of the very complex Black Sea ecosystem, including eutrophication phenomena. The results of the cruises have been used to verify improvements in the status of the Black Sea ecosystem, in particular signs of some recovery in the Phyllophora fields. Future joint cruises require donor support. Currently there is a joint cruise being organised within one of the Framework Programme projects of the European Commission (ELME project).

The Kamchiya River pilot project comprised the modelling of nitrogen and phosphorous emissions in this Bulgarian River. The model seems to be a useful tool for some first tentative order of assessments, but its performance is not yet sufficiently known to decide whether it could be proposed as a model to be used elsewhere by the Black Sea Basin countries.

**Atmospheric deposition**

No activities were carried out beyond using existing publications to estimate loading.

**Scientific conference**

BSERP facilitated (also financially) the First Biannual Scientific Conference: Black Sea Ecosystem 2005 and Beyond. May, 2006. The Second Conference in 2008 is also co-financed by BSERP. The BSC financial situation suggests that external donor financing will be needed for any future scientific conferences.

### Objective 5: Strengthening of public participation in environmental protection through access to information, stakeholder training and awareness raising and implementation of community actions (small grants programme)

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<thead>
<tr>
<th>Outputs / Indicators</th>
<th>Sustainability</th>
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<tr>
<td>5.1: NGOs structures and activities reinforced though support for institutional development and community actions in awareness raising, training and education on the issues related to the management of nutrients and hazardous substances.</td>
<td>There appear to be good opportunities for the continuation of the NGO network, especially with indications that they have received additional funding from other sources to continue their coordinating efforts amongst NGOs in the Black Sea Region. The previous history, whereby NGO umbrella organisations were supported under the GEF projects only to dissolve once funding ended, appears to have now been overcome. What is far less certain is the extent of future participation of the BSNN in BSC Annual Meetings. There appears to be a genuine interest from the BSC for a continued input from the NGO community, but financing that participation may be a problem. It can be assumed that the Network will utilise its Turkish affiliates to enable a low cost continuing presence. The NGO training efforts hold promise as having continued the process of increasing their capabilities, especially on the management of international support financing. The translation of scientific texts was very modest and unlikely to have much impact, especially with the translation effort only into English (from Russian).</td>
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</table>
5.2: Community actions for awareness raising and environmental protection implemented with funding from GEF "Small Grants Programme" targeted specifically at the support/participation in the management of nutrients and hazardous substances and protection of coastal zones and marine ecosystem.

The small grants effort holds out hope of sustainability, as the effort enabled more than 30 NGOs to participate and it can be expected to have a successful impact in terms of building public awareness. What is unknown at this point is the extent to which the BSERP small grants effort has enabled involved NGOs to increase their success in obtaining funding and public support for their work. The small grants evaluation provides some anecdotal information of successful continuing efforts amongst the 53 projects.

5.3: Public information on reduction of nutrients and hazardous substances, their effect on the Black Sea ecosystem, and the recovery measures are disseminated to the public at large (i.e., by means of the Communication Strategy, Educational Programme, Public awareness campaigns, media coverage).

Black Sea Day is in danger of receding back into the background of events – or then to become more of an NGO driven, localised effort. Inexplicably, the BSC Secretariat has so far chosen not to follow up with the offer from Coca Cola to continue supporting the Black sea day effort, and they have not solicited funds from other sources, so the means to organise events, establish a media presence and deliver branded items is not there. It is also not clear yet whether the Black Sea Commission will hold its 2008 Annual Meeting in Odessa around the Black Sea Day, as they continue to struggle with the agenda and approval of key deliverables like the LBA Protocol.

3.4 Best practices and lessons learned

1. The TDA/SAP approach in the GEF IW Programme has proven its value across many projects. Lessons from the BSERP suggest that the process of revising TDAs and SAPs should not be the rational for a continuation project. It is important to reassess and update environmental status, and to identify possible changes in pressures, and the TDA provides a very good format for this. However TDA revisions and SAP updates should be periodic/ongoing activities managed by the transboundary waters commissions, with project PIUs playing a supporting role. Taking this responsibility to an internationally funded project runs the real risk of lowering country ownership and responsibility. Of course, there needs to be a well-managed and adequately funded Commission in place to take on TDA/SAP development responsibilities.

2. The BSERP utilized an independent scientific body (e.g BSERP International Study Group) to identify the agenda for applied research through the joint research cruises. This concept should be considered for replication in other projects. An ISG enables top scientists in the region to engage with the project, and ensure that applied research efforts are science rather than policy driven. The BSERP ISG ran into some difficulties with the publication of information culled from the research cruises. It took far too long to get information out, and there have been reported instances where published works from the research effort did not cite the financial contribution of UNDP/GEF/BSERP.

3. The Black Sea region during the last 10 years has witnessed a significant reduction in support for marine sciences and regional research institutes. Previously well-staffed and funded institutes were stripped of their funding and in a precarious financial position. IW projects like the BSERP have become a critical lifeline for research on marine and riverine issues. This suggests a two-fold consideration: first the extent to which national support for the participating research institutes should be a pre-condition for GEF support, and then consideration on the types of support – such as training and capacity building, that should be included in the project activities. Central and eastern European countries are full of laboratories with high priced internationally-funded machinery but no spare parts or consumables, few technicians with the skills to operate the machinery, and few assignments where the machinery is needed.
4. The BSERP Steering Committee made a strategic decision during the project first phase to hire full time paid Country Team Leaders in each of the six countries to help coordinate activities. The decision was made based at the urging of the participating countries and reflecting some difficulties in getting the involved Ministries to follow through on expected commitments. The CTL effort received generally strong support from the stakeholders interviewed, raising the question whether this approach should be replicated in other projects.

There can be some benefit to taking a CTL approach to project management in special cases, however this approach should be avoided where possible due to significant downside risks. On the positive side, hiring CTLs can enable projects to expand country activities and improve coordination in situations where the responsible agency is not managing the effort well. As to the downside risks:

- CTLs constitute a major cost factor for multi-country projects. What is typically expected as a co-financing cost born by the partner countries becomes an administrative cost to the project – thereby reducing available funds for demonstration projects and other technical assistance.

- There is an important issue at stake concerning country ownership and sustainability. If the countries are not financially responsible for in-county project management, they are less likely to have a stake in the outputs and productivity of the CTLs and project as a whole.

- If the in-country coordination is paid for by the project – then at the end of the project there are likely to be problems in terms of sustaining the effort. The BSERP devised a phase out strategy over the final 18 months to scale back CTL financial support – with the expectation that the countries would escalate their support.

- If CTL’s are to play a technical role they need technical skills. This requires a transparent CTL selection process that can identify persons with the requisite technical capabilities.

- CTLs paid for by the project but selected by the responsible Ministry officials encounter loyalty and ‘chain of command’ pressures. Who are they responsible to and how can they be replaced if they fail to perform their proscribed duties?

The reality in some countries is that the responsible Ministries and their staff are already overburdened and have little capacity to take on more obligations, and budgets are not increased to cover the in-kind contribution obligations made when signing up for the GEF project. It may be that future GEF projects can address this issue through carrying out a more extensive needs assessment of each participating country during project development, and generating a more detailed and ‘honest’ assessment of expected country in-kind contributions. Such an approach could lead to a differential support structure for projects – where countries may be eligible for direct support for in-country coordination if it is clear they cannot participate otherwise. More capable countries would then be supported only through indirect mechanisms such as demonstration projects. The UNDP/GEF Danube Project experienced this situation during the second phase and elected to hire a full time CTL only for Bosnia-Herzegovina, which was well-justified on the basis of the split government structure in that country.

5. Exit Strategies can help countries focus on the eventual closure of a GEF support project and consideration of what they will do to sustain and replicate activities. The BSERP/BSC Exit Strategy is quite brief and lacks an array of options (based on available budget) nonetheless, it includes useful comments and recommendations, and it builds upon the institutional review developed for the BSC, so the two taken together constitute a reasonable consideration of how to strengthen the capacity of the BSC to carry out its intended mission(s) over the short, medium and long terms.
6. One of the key concepts behind Exit Strategies is to set in motion a gradual phase out of project support, especially for Commission and Advisory Group meetings, with the partner countries increasing their budgets to compensate. The BSERP Exit Strategy establishes no such recommendations for funding phase down, and there is no indication that discussions were held with the Commission members (in their dual role as Steering Committee Members) on a phased transfer of financial responsibility.

7. The institutional strengthening aspects of GEF IW projects, especially when they include support for a Permanent Secretariat, need further consideration and revision. In the Black Sea project, similar to the Danube experience, the relationship between project PIU and Commission Secretariat is complicated and fraught with potential problems – especially relating to span of control and decision-making authority on how budgets are allocated. Project Documents need to clarify in far greater detail this relationship. For the Black Sea, the problem was initially exacerbated by having a separate steering committee structure for the Project and the Commission. During the 2nd phase, this was altered, with Commission members also participating as Project Steering Committee members.

8. The BSERP small grants effort builds upon successful small grants sub-programmes in several of the GEF full size projects. In light of these achievements, UNDP and GEF should consider expanding the budget for NGO small grants components, but better integrating them into the strategic planning for many of the planned project outputs. So, for example, NGO small grants should be a key aspect of the communications and public awareness strategy, with NGO's providing specific inputs that help the project meet its strategic aims. Likewise, there should be room for NGO participation in pilot studies, environmental monitoring, education and training activities.

3.5 Recommendations

3.5.1 Black Sea Countries and Commission

9. Agree to allow international/regional organizations into the Commission, paving the way for membership of the European Commission. This is the only means for enabling this Commission to play a significant role in Black Sea fisheries, as Romania and Bulgaria can no longer negotiate on these issues independent of the European Union. EU membership can also be expected to aid in financial support to the organization.

10. It is unlikely that the countries will provide much in the way of additional funding or resources to the Black Sea Commission and its Secretariat. As a consequence, it is important to set realistic expectations for Commission and Secretariat activities. The existing Secretariat work plan includes a wide array of activities that cannot possibly be achieved by two technical experts and an IT expert. The work plan should be drastically pared down, commensurate with the extent of interest and support being shown by the participating countries.

The Secretariat should be able to accomplish the following:

- Support for the Commissioners in terms of setting the agenda providing briefing documents for annual meetings, and tracking progress on SAP and other agreements and country obligations.
- Assisting Commissioners in the revisions and then approval and ratification efforts for the LBS Protocol, revised SAP and Bucharest Convention amendments
- Develop State of the Environment reports for the Black Sea
- Coordinate communications and outreach to linked Commissions and organizations (MAP, ICPDR, HELCOM, European Commission, European Environmental Agency).
- Serve as a repository for news, information and applied research on the Black Sea, using the BSIS and made available through the BSC website.
- Organize an annual Black Sea Day celebration.

11. Expert/Advisory Groups can and should supply technical and policy expertise and country support to the BSC. In the case of other Commissions, such as HELCOM and the ICPDR, the AGs (or expert groups) function as the driving forces for policy recommendations and the drafting of legal instruments such as protocols. In the case of the Black Sea, the AGs have seriously underperformed. AG performance was hampered by: participants changing frequently and many participants lacking adequate English language skills. The BSC Institutional Review identified 16 subsidiary bodies to the BSC: 6 regional activity centres, 7 standing advisory groups and 3 ad hoc working groups (for WFD, State of the Environment Report, and Danube / Black Sea Joint Technical Working Group). The Institutional review provides a recommendation to reconfigure the subsidiary arrangement, and reorganize support into three “units”, organized thematically around Science and Information, Policy and Law, and Economic Sustainability / Project Management. While the reorganization of the advisory groups into these three units is a sound idea, the further suggestion to have countries assign and pay for experts to staff these units is not likely to get much traction with the responsible ministries. A more modest approach would be to reconfigure the expert groups into the three thematic areas, and then push the countries to fund an annual meeting for each of them.

12. Revise the Black Sea Convention, SAP and other instruments to strip away the role and responsibilities of Regional Activity Centres (RACs). Two of the six named RACs no longer function. The RACs were selected through a closed door process without competitive bidding and with politics more than expertise playing the deciding role on the designated activity for each country. In the future, the BSC and country decisions on granting contracts for carrying out research should be done on a case by case basis, using standard Terms of Reference and Requests for Proposals.

13. It is assumed based on discussions with UNDP and GEF officials that no further support will be provided, at least in the near term, and on a region-wide basis, to the Black Sea. This is appropriate. After 16 years, it is time to call a hiatus to GEF support. In particular, it will be important for the Black Sea Countries to show a good faith effort in achieving their SAP and other policy targets as a precondition for further international funding.

There may be opportunities at the national level, however, to continue providing support on integrated coastal zone management, especially as a planning tool for climate change adaptation. There should also be opportunities at the national and local level for the application of small grants programs, in particular to capitalize on the previous efforts of NGOs in the region to expand public awareness and promote the Black Sea Day. Small grants, coupled with the Coca Cola ‘Every Drop Matters’ support frame, could have a real impact and greatly help the BSC.

It is also possible that negotiations within the BSC will provide a seat for the European Union, which should stimulate additional EU financial support. There is strong interest at the European Commission to see the BSC strengthened and successfully coordinating regional marine policy for the Black Sea region.

14. Phase 1 of BSERP generated some modelling studies on air deposition, however not narrowly focused on nitrogen loading. Based on a decision of the ISG, the BSERP re-directed funding from a Phase 2 atmospheric deposition study to other activities because the available funding was considered insufficient for delivering a robust study with monitoring data collection. This is a subject that begs for further review as scientists have suggested that air born dispersal of nutrients is a major contributor to Black Sea eutrophication. At its core, this is an issue relating to the application of fertilisers and manure for agriculture, as well as the combustion of fossil fuels. The subject links closely with non-point source (NPS) runoff, another
subject that received some attention under the BSERP but where much more work is required.

While further studies can help determine the extent of air born and NPS problems, achieving stress reduction outcomes will take project assistance aimed at farm management, such as training farmers in best agricultural practices, generating investment and loan finance for environmentally-beneficial farm investments, helping to establish marketing opportunities for organic farming and designing projects that can utilise green house gas credit trading markets. The agriculture sector in the Black Sea countries is slowly rebounding. Without changes in farm management practices, the eutrophication problems of the previous decade will surely return in the coming years.

3.5.2 UNDP/GEF
15. Monitoring and evaluation methodology for full size projects should be reviewed in light of the Black Sea experience. In particular, guidance on the timing of mid term evaluations should be met. The BSERP Phase 2 was approved prior to conducting the MTE, which in the future should be avoided. Recommendations included in the (belated) mid term included suggestions to plan for closer monitoring of projects during their first year, which should now be possible with the expanded UNDP/GEF regional advisory setup. Consideration should also be given to requiring mid term and final reports by the project teams, forming the basis upon which the external evaluators do their review. The Black Sea PIU made a very good effort on project reporting – with CDs developed at mid term and final as well as a final summary of achievements.

16. PIU reports at the mid term and final stages should include an accounting from the project partners of their in-kind and cash contributions to date. Otherwise, it is exceedingly difficult for the evaluation team to determine whether promised contributions were achieved or even exceeded. The track record on tabulating partner contributions has been significantly better when the projects are being considered for a continuation grant from GEF. The IMO/UNDP/GEF GloBallast project, for example, tabulated partner contributions and could then show a significant catalytic impact. The BSERP and Danube projects, in contrast, were unable to formulate these figures. To create accurate figures for in-kind contributions, this would need to be done on an annual basis. This should be considered for inclusion in the APR/PIR reporting procedures.

17. The TDA/SAP development process provides a strong basis for assessing pressures and measures, to protect water resources. Its emphasis in GEF IW projects may need to be reconsidered, in particular to reduce the time and cost of development. A preliminary TDA should be part of the ProDoc development exercise, with a SAP already outlined as part of the project objectives. A revised and expanded TDA and SAP can then form part of the mid term deliverables, with another set of revisions forming the final project deliverables. In this way, the SAP can avoid being construed as a one-off negotiated agreement, instead serving as a working plan for cooperative efforts to improve environmental status (SAP) based upon a periodically modified analysis (TDA).

18. The prolonged friction between the PIU and Secretariat, lasting throughout the BSERP Phase 1 and part of Phase 2, created a serious drag on project achievement. Had the two teams worked in greater harmony, and had the countries worked more diligently to achieve agreed project objectives, this could have been a highly successful project. Anticipating this kind of problem will be critical for the success of future Commission support projects. During the project design phase there needs to be consideration given to whether the main focus is on the resource, or the regional body (Commission) set up to protect that resource. Will success be measured by the number of outputs completed? Or whether the effort has helped to ensure the sustainability and effectiveness of the Commission/Secretariat. This decision needs to be clarified upfront and stated clearly in the ProDoc. In addition, Memorandums of Agreement between the parties should be considered. In this case, there would have been an MOA between the BSC and UNDP spelling out the
responsibilities of the BSERP PIU and the particular support mechanisms that would be provided to the Secretariat. There would also have been MOAs signed with the responsible ministries in each government on their specific in kind and financial contributions. . .

19. Interministerial coordination is very important for furthering the aims of integrated water resources management and coastal zone management. The difficulty is that GEF IW projects are typically managed through the environmental/water/natural resources ministries with little involvement of other ministries. The Black Sea experience showed the difficulty in getting interministerial involvement. Future projects need to include interministerial coordination as part of the Project Document expectations, built from actual planned outputs and activities. For instance, a planned output to negotiate a fisheries protocol needs to include the engagement of ministries responsible for fisheries. The key is to get these commitments prior to project approval.

20. Research cruises can be time and money intensive, the negotiations preceding them on where to study are often arduous and saddled with geo-political baggage, the scientific reporting is often slow, the outcomes are often of marginal use in TDA development, and there is rarely enough budget to edit, summarise, translate and publish the materials for a wider audience. So, why carry on these exercises? The answer is that when managed well, they provide a useful addition to the project effort. The two main aims should be: a) to develop as informative source of knowledge in areas where historical environmental monitoring has been weak, and b) to enhance communications strategies by providing another platform for media, public awareness and education.

3.5.3 Ratings

The evaluation team has rated various criteria from the project, based on a four step system: highly satisfactory, satisfactory, marginally satisfactory and unsatisfactory. The ratings set out below are necessarily subjective, yet based on a thorough review of project achievements, taking into consideration the comments of persons interviewed, an understanding of the challenges of forging consensus on environmental protection in the region and also considering the achievements of other GEF/IW projects. It is important to emphasize that the ratings reflect the total sum of: project design, PIU performance, plus efforts of the partnering countries and the project steering committee/Black Sea Commission.

A rating of satisfactory has been determined for the outcomes and achievement of objectives. On the one hand, the project succeeded to advance an improved understanding of the status and trends in Black Sea ecosystem health, and the establishment/re-establishment of linkages amongst the region’s scientific community. The project also delivered an improved Transboundary Diagnostic Analysis and a draft revised SAP. On the other hand, wider project objectives including policy reforms and improved collaboration amongst the Black Sea coastal country governments to deal with shared problems in fisheries, land based sources of pollution, and coastal biodiversity protection/planning, did not advance as far as expected during the project period and will face continuing difficulties to achieve in the future.

A rating of marginally satisfactory is indicated for the implementation approach. The implementation approach refers both to how the project was conceived and then how it was managed – and the adaptive management that occurred. Some of the problems experienced during project implementation had their germination in the project formulation phase, resulting from an overly ambitious ToR, under-resourcing to meet the ToR and a failure to agree with the Black Sea Commission on project priorities. The PIU operated under difficult circumstances, in particular, the strained working relationship between the Project team and Secretariat through the beginning and middle period of the project was a critical problem that took several years to resolve. Staff turnover was clearly a factor, especially during the BSERP 1st phase but also continuing through the second. There was a strong rebound in the later stages of the project in terms of PIU/Secretariat cooperation and the achievement of outputs. Stakeholders gave high marks for the
management of the small grants program, and the Black Sea Day campaigns (especially 2006) as well as the management of various seminars and workshops.

Stakeholder participation outcomes were *satisfactorily* achieved. There was room for improvement in terms of developing and implementing a communications strategy from project start up, and the educational and public awareness efforts, while innovative (i.e. shell palace), lacked planning and follow through. The Black Sea Day efforts, especially in 2006 and 2007, were quite successful, and the TV documentary well conceived. The broadening of NGO participation went well, and the small grants programme was a success.

A rating of *marginally satisfactory* is indicated for project sustainability. On the positive side, the project team succeeded in producing outputs that can help to promote long-term regional cooperation for ecosystem protection and to forward the objectives of the Bucharest Convention. The project team produced a revised TDA and SAP, LBA protocol, legally binding document for fisheries, and ICZM strategies; they also endeavoured to improve the capacity of the Black Sea Commission and its subsidiary bodies. On the negative side, these outputs have so far had negligible impact on national policy setting amongst the Black Sea countries. Budgets are not sufficient for effectively managing the BSC Secretariat. Protocols are not being ratified. The (current) SAP targets keep getting shifted back rather than achieved. There has been little progress made on fisheries management. Other than the two EU countries, the rest of the Black Sea countries have made only minimal progress in passing legislation and implementing programmes for integrated coastal zone management. The October 2008 Black Sea Commission annual meeting will provide a litmus test for the commitment of the contracting parties and the sustainability of this partnership.

Monitoring and evaluation was *marginally satisfactory*. As noted, the project was pushed through to a second phase prior to its mid term review and despite serious concerns at the GEF over its first phase accomplishments. The (revised) project team responded well to the MTE and Danube/Black Sea stock taking recommendations and the Black Sea Commission also reconfigured its Secretariat, and starting in late 2005, the project was back on track.