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For further information on this report, please contact:

Director, OED
Viale delle Terme di Caracalla 1, 00153
Rome, Italy
Email: evaluation@fao.org

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This report is based on observations by the Evaluation Team in three ECCA countries, some interaction with representatives of other ECCA countries during a one-day workshop, a questionnaire analysis, and document reviews. The evaluation could not comprehensively cover all aspects of the project. However, we hope that this draft provides a good enough assessment of the “big picture”, which can give some idea of the project’s achievements and constraints.

Composition of the Evaluation Team

Evaluation team

Eloise Touni: Independent Consultant¹

FAO Office of Evaluation

Bernd Bultemeier: Evaluation Manager, Team Leader²

¹ Eloise has a Masters in Environmental Technology, specialising in contaminated land, risk assessment and pollution regulation. For several years, she has worked as International Project Officer with PAN-UK, where her main area of work was the Africa Stockpiles project.

² Bernd has a background in Rural Sociology, and has been involved in several evaluations dealing with plant protection issues.

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Acronyms

AGPP	Plant Protection Service of FAO
ASP	Africa Stockpiles Programme
CD-ROM	Compact Disk – Read Only Memory
DDT	Dichloro-Diphenyl-Trichloroethane
EA	Executing Agency / Environmental Assessment
ECPA	European Crop Protection Association
EECCA	Eastern Europe, Caucasus & Central Asia
ESM	Environmentally Sound Management
EU	European Union
FAO	Food and Agriculture Organization of the United Nations
FPMIS	Field Programme Management Information System
GC	Green Cross
GCB	Green Cross Belarus
GEF	Global Environment Facility
HCH`	Hexachlorocyclohexane
IA	Implementing Agency
IBRD	International Bank for Reconstruction and Development
IFCS	Intergovernmental Forum on Chemical Safety
IGO	Inter-Governmental Organization
IHPA	International HCH and Pesticides Association
IHP Forum	International HCH and Pesticides Forum
IPM	Integrated Pest Management
M&E	Monitoring & Evaluation
MSP	Medium Sized Project
NATO	North Atlantic Treaty Organization
NGO	Non-Governmental Organization
NIP	National Implementation Plan (of the Stockholm Convention)
OED	FAO Office of Evaluation
OFDA	Office of Federal Disaster Assistance
PHARE	Pre-Accession assistance programme of the European Commission
POPs	Persistent Organic Pollutants
PPE	Personal Protective Equipment
PSMS	Pesticide Stock Management System
PSC	Project Steering Committee
REC	Regional Environmental Centre for Central and Eastern Europe
SAICM	Strategic Approach to International Chemicals Management
SBC	Secretariat of the Basel Convention
ToC	Table of Contents
ToT	Training of Trainers
TSU	Technical Support Unit of the Africa Stockpiles Programme
UNDP	United Nations Development Programme
UNEP	United Nations Environment Programme
UNIDO	United Nations Industrial Development Organization
USAID	United States Agency for International Development
USD	United States Dollars
WHO	World Health Organization

Executive Summary

ES1. Stockpiles and wastes that consist of or are contaminated by persistent organic pollutants presented (and to some extent still present) an environmental and health threat in many developing countries and countries in transition. Under the Stockholm Convention, parties are required to implement measures to reduce or eliminate releases by persistent organic pollutants that are covered by the Convention. However, practicalities of identifying persistent organic pollutants stockpiles and wastes, managing and taking action to eliminate the stockpiles and wastes in compliance with the requirements of the Convention are complex and beyond the capacity of most developing countries and countries with economies in transition, including the EECCA countries participating in this project.

ES2. The project started on 1 April 2009 with an initial scheduled duration of 30 months (later extended by 12 months), and an overall budget of US\$ 2,396,550, of which the GEF contribution was US\$ 1,000,000. FAO was the GEF agency for the project, in order to manage the project through agreements with participating country governments, Green Cross Switzerland, International Hexachlorocyclohexane and Pesticides Association (IHPA) and Milieucontact International (MKI) for the provision of goods and services.

ES3. Project coordination was provided by FAO, while a project secretariat hosted by Green Cross Belarus (through Letter of Agreement) was established for day-to-day execution of project activities through the provision of services such as communication, procurement, hosting the website, organizing meetings, arranging travel and other administrative functions.

ES4. The primary objective of the project was the reduction of pesticide releases into the environment and the elimination of the human health and environmental threat they pose in EECCA countries. The project was to facilitate viable and environmentally sound measures for the identification, handling and disposal of pesticides stockpiles and wastes, and the incorporation of strategies for prevention and management of obsolete pesticides into national policies with a strong emphasis of regional and sub-regional approaches.

ES5. The expected results of the project were organized into four outcomes: Outcome 1 was about “enhanced awareness among participating countries on prevention and disposal of POPs and obsolete pesticides”; Outcome 2 about “strengthened capacity for POPs and obsolete pesticide prevention and disposal”; Outcome 3 about “Framework for exchange of information and experience among countries on the prevention and disposal of obsolete pesticides”; and Outcome 4 about “Greater stakeholder involvement in prevention and elimination of POPs and obsolete pesticides.

Conclusions

ES6. Overall, **the project achieved more than its original objectives**, particularly in the area of awareness raising and capacity building for inventory, through the implementation of additional pilot activities through the “micro-support projects” which were not explicitly envisaged in the original project design but conducted in Armenia, Azerbaijan, Georgia, Macedonia, and Romania.

ES7. **Outcome 1 Awareness:** The project was successful in raising awareness among governments of the urgency and approach to dealing with obsolete pesticides, at all levels.

After the 2nd IHPA Forum, the hosting country Azerbaijan declared its commitment to becoming a regional leader in management of obsolete pesticides, concretely with a declaration and national plan. In Romania, workshops at local administration level were intended to increase applications for POPs and pesticide management issues to EU structural funds; however data on the success of these meetings was not available by the time of the Evaluation.

ES8. Micro-support activities in five countries had an impressive public outreach including TV shows, public meetings in libraries, and improving public access to information on stockpiles. These projects found an impressive level of knowledge and willingness of populations to discuss about OP stockpiles and sites. It is not clear whether the awareness raising had a clearly defined objective in each case (e.g. reporting OP or adopting IPM) and this level of impact could not be evaluated in the current evaluation.

ES9. **Outcome 2 Capacity Development:** All the planned training and pilot projects were successfully completed, to high levels of satisfaction and enthusiasm of participants. Two pilot repackaging projects (Belarus and Azerbaijan) and one on repacking in Georgia took place; inventories were conducted in Armenia, Georgia and Macedonia³.

ES10. The Environmental Management Plans training was held late in the project timeframe (June 2012) and was viewed by some participants as very complex and not very easy to implement. Azerbaijan and Belarus have national plans for managing obsolete pesticides, and Romania has identified and acted to simplify access to EU funds to deal with their stocks.

ES11. **Outcome 3 Information Sharing:** The project increased information sharing between participants, but mainly through direct contact at meetings and on an ad-hoc, on-demand basis between individuals through Skype and email – the weakness with this being that partners did not always know what was available to ask for. Participants shared information for specific needs, e.g. development of national plan 2012-14 in Azerbaijan, and of micro-support proposals.

ES12. The development of a more systematic information sharing mechanism – the obsoletepesticides.net site – was delayed, and not used to facilitate information exchange during the project. The site is based on a previously created MKI wiki, decentralised and user-generated content (from project management, ministries, FAO, NGOs, etc), including OP projects in the Former Soviet Union region; reference materials; discussion board; and database of individuals trained in obsolete pesticide management. Due to legal issues (mainly about the extent to which FAO could be seen as endorsing content) this has not been launched and is not being used at the time of the External Evaluation.

ES13. **Outcome 4 Stakeholder Involvement:** The project achieved a significant result in gaining EC support and involvement in a regional project to dispose of obsolete pesticides, with a budget of €8.5m in 10 countries. The project was promoted at the European Parliament, Environment for Europe conference, Stockholm 5th Conference of Parties, and World Health Assembly, and this latter event resulted in a WHO Recommendation. However,

³ However, it appears that more in-country refresher training would have been helpful to raise the confidence and capacity of some trainees.

there is no evidence of any practical involvement of health stakeholders in obsolete pesticide projects as a result of this Recommendation.

ES14. The micro-support projects were very successful at involving stakeholders in each country. Firstly, government support was leveraged, mostly at a technical staff level rather than official Ministry level, but with significant level of ownership – for example, organising trainings, and contribution to field activities (inventory, awareness, ambulance for repackaging) – this was evident given the scope and achievement of project budgets of only €7,500. Secondly, the projects themselves were very effective in creating functional links and roles for stakeholders, from local administrations, mayors, libraries, etc.

Recommendations

As the project as such will not have direct follow-up, the recommendations below are of a more general nature, to be considered e.g. in the FAO-implemented EU project mentioned above.

To FAO, NGOs and potential donors

ES15. Future projects should include: a. building capacity for rapid assessment of pesticides in the field; b. container management technologies⁴; c. developing appropriate skills at the local level to formulate projects and successfully obtain funding, including from national and district level governments.

To FAO, NGOs and potential donors

ES16. Promote flexibility in applying international standards: a. recognizing existing government actions to deal with OP in their own programmes, provide tailored support on request aiming to gradually bring national regulations, planning and material provisions for better practices in line with international standards – this may take many years and require a long term presence of FAO in the country; b. further deploy micro-support and NGO partnership approaches to provide flexible support with high levels of leverage, while recognizing the administrative burden of micro project management (selection, contracts, logframe).

To FAO and NGO partners

ES17. New projects should plan to remove pesticides as far as possible⁵ - this is the main demand by countries – and FAO, together with NGO partners in the field, should lobby donors on the need for larger-scale funding needed for full disposal programme regionally.

To FAO and NGO partners

⁴ Prevention – which could have a significant impact on the avoidance of stockpiles – was mentioned almost accidentally in the project document. Consequently, there was little prevention activity in the project.

⁵ FAO could consider avoidance of multi-phase projects (where inventory/safeguarding is phase 1, leaving disposal to a future phase 2 project – which may take a long time to materialize), preferring instead a country project, but with full disposal.

ES18. The information exchange platform obsoletepesticides.net should get online before the end of the project, and a solution should be sought to keep it running. This requires also a clarification of the roles of how FAO and its partners can share editorial control while respecting FAO guidelines, and it should involve a commitment to ensure that all data of the project (including individuals and institutions involved at local levels) is not lost.

To FAO and NGO partners

ES19. As knowledge about obsolete pesticides continues to be limited, also future projects should still contain awareness raising activities: a. list AR as an activity for each outcome – e.g. under repackaging, AR is required to prevent local populations resisting project activities; b. use libraries and local authorities’ schools or health services as venues for AR activities; c. consider targeting AR materials for politicians in parallel with general AR initiatives

To FAO, NGO and government partners

ES20. In future projects, involve health ministries, based on the WHO Recommendation on OP; e.g. seek to raise their awareness of obsolete pesticide stores or burial sites and encourage them to monitor/ study possible impacts on health of communities; clearly identify roles for them in disposal/ prevention/ awareness raising activities (e.g. posters at health centres, poisoning info, etc)

Table 1. Project Ratings

Area	Rating	Comment
Achievement of objectives	HS	The project achieved more than its original objectives
Attainment of outputs and activities	HS	See above
Cost-effectiveness	HS	Working through NGOs contained costs
Impact	S	Due to limited budget and short duration
Risk and Risk management	S	Some re-packaging activities would have required better technical guidance; initial low-level recognition by some governments
Sustainability	S	See impact above
Stakeholder participation	S	Good involvement by civil society; unsuccessful in Mongolia
Country ownership	MS	Some governments slow to recognize project
Implementation approach	HS	Flexible and cost-effective; adequate for small-scale project
Financial planning	HS	Exemplary accounting
Replicability	S	Needs up-scaled follow-up to tackle awareness and disposal
Monitoring and evaluation	MS	Good awareness of progress among project participants; less transparent for relative outsiders (e.g. initially little information on FAO’s information system)

1 Introduction

1.1 Background and purposes of the evaluation

1. In accordance with the project document, an independent terminal evaluation was to be undertaken at the end of the project implementation. The terminal evaluation was to determine progress made towards achievement of outcomes, and to assess the effectiveness and efficiency of the institutional arrangements on project implementation and the net benefit or negative impact of this on the recipients. The evaluation was to, inter alia:

- review the effectiveness, efficiency and timeliness of project implementation through the LOA;
- analyse effectiveness of implementation and partnership arrangements;
- identify lessons learned about project design, implementation arrangements and management;
- highlight technical achievements and lessons learned;
- assess and levels of project accomplishment; and
- synthesize lessons that may help improve the selection, design, and implementation of future GEF activities.

2. The Terms of Reference for this Terminal Evaluation were prepared in close consultation with FAO Office of Evaluation (OED) and the FAO GEF Coordination Unit within FAO in accordance with the evaluation policies and procedures of FAO and the GEF; Annex I of this evaluation report contains the evaluation Terms of Reference.

3. The Terminal Evaluation took place in September/October 2012; the evaluation benefited from attending a lessons learned workshop held in Moldova on 26 September 2012⁶.

4. The project started in April 2009 with an overall budget of US\$ 2,436,550, of which the biggest contribution of US\$ 1,000,000 came from GEF. (This evaluation concerns in particular the GEF allocation to the project, which was managed by FAO in partnership with NGOs.) Throughout the project lifetime, the GEF allocation remained unchanged, but the project end date (NTE) was extended from 30 September 2011 to 31 December 2012.

1.2 Methodology of the evaluation

5. The evaluation made use of the following tools: review of existing reports, semi-structured interviews with key informants, stakeholders and participants; direct observation during field visits, and questionnaires to key stakeholders.

6. Visits to two countries where project activities were organized (Azerbaijan and Belarus) as well as attendance at a lessons learned workshop (Moldova) allowed for some direct impressions of project activities; interviews with project staff and national institutions

⁶ The finalization of the report was delayed initially by late questionnaire returns, followed in 2013 by the Team Leader's bad health.

and BGOs involved in project implementation offered an opportunity to gain some first-hand experience from project stakeholders.

7. Despite the presence of most national project implementers at the lessons learned workshop in Moldova, the limited time available to interact with the evaluation mission posed certain constraints for the evaluation, which also the questionnaire survey could not entirely overcome. However, the mission is confident that the evaluation has been able to capture the broad picture.

2 Context of the project/programme

8. Mismanagement and accumulation of obsolete pesticides and POPs pose a threat to health and the environment locally, regionally and globally. In response to this threat, Article 6 of the Stockholm Convention requires countries to take measures to eliminate or reduce the release of POPs into the environment.

9. In order to effectively implement Article 6 of the Stockholm Convention, it is necessary for countries to carry out a comprehensive and detailed inventory of POPs stockpiles. Although most countries, including those participating in this project, had already completed before project start an indicative inventory of POPs within the framework of their National Implementation Plan (NIP), these inventories did not provide sufficient details in order to allow a detailed management or elimination plan to be developed. Neither would an indicative inventory suffice for wastes to be transported across international boundaries or by sea and treated or destroyed in an appropriate facility in compliance with relevant national and international legislation.

10. The management of POP stockpiles requires specialist knowledge, trained personnel and adequate protection for people and the environment to ensure that the requirements of the Convention are adequately met and that health and the environment are adequately protected. The capacity for elimination of POPs was stated to be non-existent or very limited at best in the countries participating in this project.

11. At the time of project formulation some of the Central European and EECCA countries had been aware of the problems with large stocks of obsolete pesticides dating from excessive procurement during the Soviet era, associated wastes and contamination of soil and ground water for many years and had been looking for solutions. In some cases, countries had taken action on their own or with external assistance to address the situation. On the whole however, the problems were not being addressed adequately either in terms of scope or in terms of standards applied to remediation activities. Unused products were buried in locations – deliberately in remote, inaccessible areas such as woods and forests, to prevent exposures – and conditions that were not documented, leaving today’s authorities to rely on hearsay (e.g. from the individuals who were involved in burying products many years ago). In some cases pits were lined with concrete, in others not. In the 70’s and 80’s in certain countries, centralized polygons or concrete-lined burial pits were created for disposal/storage of these products. This is not considered an environmentally sound disposal method according to the Stockholm and Basel conventions.

12. The project was developed under the GEF Strategic Priority of Strengthening Capacities for NIP development and Implementation; for FAO, it came under the Organization's Strategic Objective A (Sustainable Crop Production Intensification) and Organizational Result A3 (Risks from pesticides are sustainably reduced at national, regional and global levels). (These FAO Strategic Objectives and Organizational Results were still being formulated at the time of project formulation; however, they have a long history – under different guises – in FAO.)

3 Analysis of project concept and design

13. The primary objective of the project was the reduction of pesticide releases into the environment and elimination of human health and environmental threat they pose in EECCA countries. As such the project aimed to facilitate viable and environmentally sound measures for the identification, handling and disposal of pesticides stockpiles and wastes, and incorporation of strategies for prevention and management of obsolete pesticides into national policies with a strong emphasis of regional and sub-regional approaches.

14. The project aimed to provide both technical and policy solutions. Technical solutions were to include removal of major known sources of contamination such as obsolete pesticide stocks and capacity building to strengthen pesticide import controls and product quality control. Policy solutions were to include strengthening pesticide legislation and training for government staff so that they are better able to identify and address weaknesses in the system.

15. FAO was the GEF agency for the project and as such provided overall project management and technical guidance. As the GEF agency for the project, FAO undertook to:

- Manage and disburse funds from GEF and other co-financiers of the project in accordance with the rules and procedures of FAO;
- Enter into agreements with participating country governments⁷, Green Cross Switzerland, International Hexachlorocyclohexane and Pesticides Association (IHPA) and Milieukontakt International (MKI) for the provision of goods and services to or from the project;
- Oversee project implementation in accordance with the project document, work-plans, budgets, agreements with co-financiers and the rules and procedures of FAO;
- Oversee the execution of the project to ensure that appropriate technical standards are applied to all activities concerned with pesticide management and handling.

16. As per the project document, FAO nominated a Project Coordinator. (This position was filled by three different persons during the project's lifetime.) The project document furthermore envisaged the existence of a project secretariat hosted by Green Cross Belarus⁸ (through Letter of Agreement covering the entire GEF amount – US\$ 1,000,000 - between FAO and Green Cross) for the provision of project secretariat services and execution of project activities. The management of this agreement was the responsibility of the FAO

⁷ It appears that this intention was not pursued; this may have contributed to some temporary problems in Belarus concerning the importation of equipment exempt from duty.

⁸ The prodoc did not mention Green Cross Switzerland as a key actor; however, GC Switzerland emerged as quasi Project Manager / Monitor while GC Belarus provided more straightforward secretariat services.

Project Coordinator. However, eventually the Letter of Agreement was made between FAO and Green Cross Switzerland – apparently for reasons internal to Green Cross. (The Project Secretariat was established in Belarus, but the Coordinator of the Secretariat was part of Green Cross Switzerland.) and of convenience.

17. This for FAO highly unusual arrangement was concluded as it seemed to offer several advantages. According to the project document, these were:

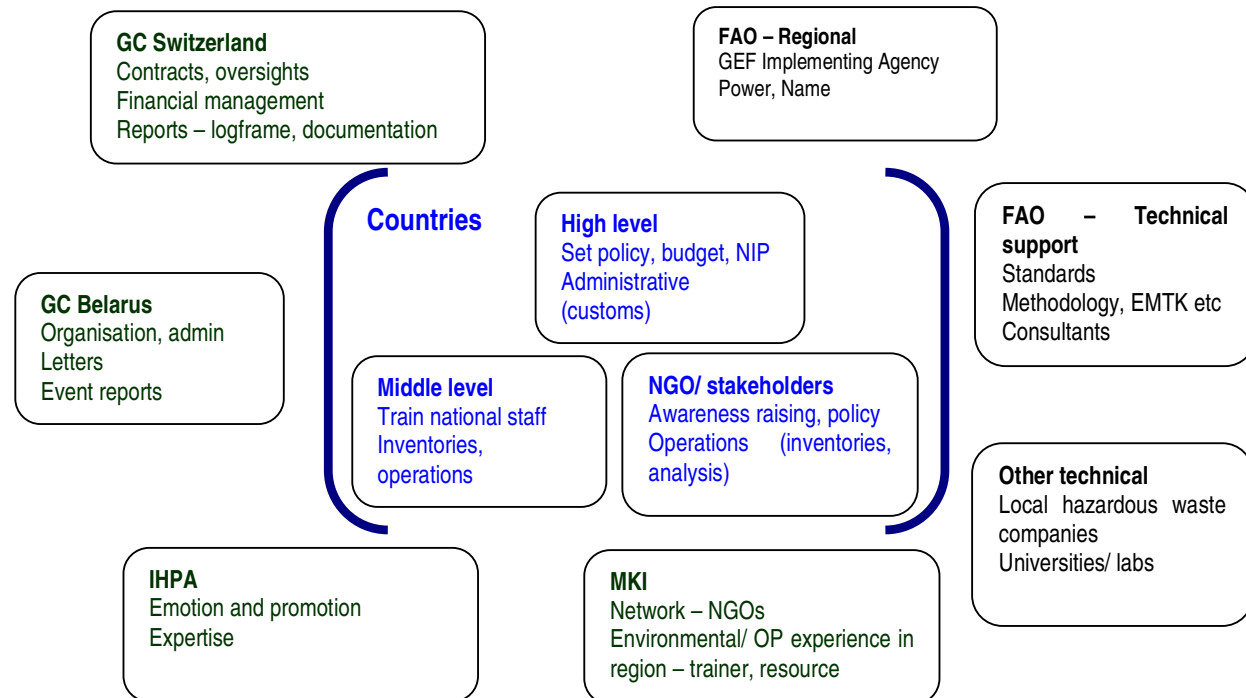
- Extensive experience working on environmental remediation related projects in the EECCA region with countries participating in this project and with other organizations that have an interest in the outcomes of this project;
- Location in Belarus which is participating in the project;
- Proximity to the region in which this project will be implemented as well as linguistic skills to facilitate efficient communication between project partners;
- Low cost of services compared to other options, such as employing additional staff at FAO. Green Cross Switzerland will wholly finance the secretariat at GCB and, in addition, provide a cash contribution to the project;
- Synergy with other environmental projects and associated organizations in the region in which GCB plays an active role.

18. The project document also foresaw the position of Project Manager from IHPA for the day-to-day work organization. The reason given was that IHPA was the “single organization that has been most active in efforts to eliminate stocks of POPs and obsolete pesticides in EECCA countries. Through its efforts and activities IHPA has developed a unique network and a highly respected reputation among the key individuals and institutions that will be stakeholders in this project”. As it turned out, the designated Project Manager did not much contribute to the day-to-work, but played an important role as advocate for project initiatives⁹.

19. The project document also foresaw the existence of a Steering Committee for certain tasks (participation in meetings, review workshops) without, however, defining the membership of the Committee or its terms of reference. This oversight was not rectified during project implementation; a Steering Committee existed in name, drawn from project counterparts from the participating countries, which decided on e.g. the selection of micro-projects – but a proper function with a better definition of the Committee’s mandate was apparently not developed.

⁹ The management fee – at least in the initial project period – amounted to over US\$ 4,000/month, and was paid for by Green Cross as per agreement with FAO. The Project Manager also acted as trainer on at least one occasion.

Graph 1. Actual Implementation Arrangements



20. Although the envisaged institutional arrangements underwent a number of changes, the evaluation agrees that the general approach chosen was sound for a project of this magnitude, and that it almost certainly also kept the costs contained. Working through NGOs probably increased the flexibility of the project, the absence of FAO Representations in most participating countries was offset by the network of GC, IHPA and MKI contacts. The flipside of working through NGO networks was that (at least in some countries) government involvement and even awareness at higher levels was limited. This could be an explanation why Mongolia, where probably links were weakest, eventually dropped out of the project.

21. Overall, given the limited resources available, the project approach was adequate as the project was clearly intended as a pilot activity: for example, one capacity building indicator read “Four pilot activities demonstrating inventory, risk assessment and safeguarding of POP/obsolete pesticides completed”. Given these conditions and ambitions, the project’s implementation arrangements achieved their intended purpose; had there been higher involvement of FAO in some activities, perhaps more government recognition could have been achieved. On the other hand, as FAO did not have much of a presence in many countries, building contacts might have slowed down progress. FAO’s Regional Office (REU) only became involved when a new Coordinator was posted there towards the end of the project.

22. The indicators, assumptions and risks identified in the project document were valid, but did not foresee the dropping out of one country, and the reduction / cancelling of some activities; however, this did not jeopardize the overall impact of the project. To the list could have been added the risk of loss of capacity and deterioration of storage conditions between projects, in case a second phase project could not start immediately after the end of this

project (e.g. Moldova site which caught fire); also the participation of appropriate individuals from all countries, which was identified by project staff as a key challenge in implementation.

4 Analysis of the implementation process

4.1 Project/programme Management

23. The institutional and management arrangements were highly unusual for an FAO project; basically, the entire operational budget (the GEF contribution of US\$ 1,000,000) was entrusted to Green Cross, while FAO retained an oversight function "... to ensure that appropriate technical standards are applied to all activities concerned with pesticide management and handling".

24. The management arrangements were modified in the course of project implementation (stronger involvement of Green Cross Switzerland; changed role of the designated IHPA Project Manager), but FAO's role remained mainly in oversight and guidance.

25. With the caveat already mentioned (lack of recognition by senior government in some countries), this arrangement has worked well. The project had well-prepared work plans, handled most planned activities well (except those for which there were external constraints or which had been dropped by consent – see below), and also established a functioning internal review processes.

26. Regarding the latter, project management had established a routine that after each major event issues were identified which 1) could be ongoing challenges during the lifetime of the Project or which 2) could result in a need to modify the Project¹⁰.

4.2 Technical and Operational Backstopping

27. FAO Technical Officers (including the Project Coordinator¹¹) participated in all project Steering Committee meetings, but mostly did not take an active management role. FAO has a limited presence in the region: only two Assistant FAO Representatives - Georgia and Azerbaijan, of which only Georgia was at all involved in project implementation (assistance with tax and customs issues). The fact that there were no Russian speaking experts on OP at FAO was not a problem for meetings (interpretation at all trainings; participation of Green Cross, IHPA or MKI experts), but during project implementation the need for a qualified chemist with a detailed knowledge of the identification of pesticides used in the former Soviet Union became obvious.

28. The Training of Trainers planned and guided by FAO was highly appreciated, and participants generally had very positive feedback on the quality and relevance of the training, highlighting the practical and participatory nature of the training content and methodology,

¹⁰ These were, among others, delayed responses to requests for nominating national experts to workshops; unsuitable experts being nominated; difficult assessment of a country's in-kind contribution, etc.

¹¹ The officer changed in the course of project implementation.

and commitment of trainers. FAO provided in-country support in preparing for the pilot projects (Azerbaijan - polygon and Salvan site inspection; Belarus - government laboratory facilities).

29. The translation of some OP documents into Russian was set back by delays in finalizing the original English version; FAO legal concerns about the standing of the project's Obsoletepesticides.net website¹² provided a barrier to open and collaborative information sharing, and the information documenting project progress was for a long while not available on FAO's Field Programme Management Information system, probably due to the relatively remote role played by FAO. (This changed when the evaluation mission was being set up; still, most information on the project was received from GC Switzerland.)

30. One major issue raised was that of insurance for field operations, which was dealt with in an ad-hoc fashion whereby country governments were responsible for making the necessary arrangements for the people carrying out the work. Insurance in other FAO-led OP projects is provided as a government contribution under the terms of Project Agreements, but this does not seem to have been the case for this project. The repackaging pilot projects, and the repackaging work conducted in Georgia under the micro-project, were therefore not systematically insured. (The minor fire incident at Poviatie store during the Belarus repackaging in 2011 demonstrated that incidents do occur even in the best-planned projects.)

31. During the micro-support project on inventory in Georgia, emergency repackaging was done by the Georgian team in two high-risk sites in Sachkhere. The FAO consultant advised the Georgian team on the strategy, provided manuals and extra training during workshop/ IHPA Forum, but given that the individuals involved were unsupervised and repackaging for the first time, a field visit and more direct supervision would have been a more appropriate level of technical support. Five big bags were filled from the two sites, which are currently temporarily located on pallets in the Merdzhevy warehouse. There is no evidence of zoning or emergency measures taken during repacking or transport of the obsolete pesticides.

4.3 Financial resources management

32. The financial resources of the project were efficiently and very transparently managed. GC Switzerland provided detailed and comprehensive budget and expenditure information. In line with changing circumstances and revised priorities, some of the original allocations were altered in consultation with the project's stakeholders. The most significant shift occurred with respect to Activity 2.5 (pilot projects): from roughly 50% of the budget, their share rose to almost 2/3.

33. One activity (Activity 4.1: Undertake a regional capacity needs analysis study) was dropped after consultation with project stakeholders, another activity (Activity 4.2 stakeholder partnerships) did not require independent funding.

¹² Apparently, it is FAO corporate policy not to hand over control of FAO project-related websites to external partners.

Table 2. Original Budget and Expenditure Pattern

	Original GEF Budget	Expenditure and commitments to 31/12/11	Planned expenditure for 2012	Total planned Expenditure
Activity 1.1 IHPA Forum meetings	\$100,000	\$69,993	\$10,000	\$79,993
Activity 1.2 promotional material	\$50,000	\$3,361		\$3,361
Activity 1.3 participation in meetings	\$50,000	\$5,925		\$5,925
Activity 2.1 OP training	\$103,000	\$142,807		\$142,807
Activity 2.2 technical & legal guidance	\$10,000	\$8,184	\$3,500	\$11,684
Activity 2.3 alternative concepts for EMS of Ops	\$8,000	\$7,909		\$7,909
Activity 2.4 management/disposal plans	\$44,000		\$40,000	\$40,000
Activity 2.5 pilot projects	\$530,000	\$378,662	\$272,659	\$651,321
Activity 3.1 information exchange	\$20,000		\$5,000	\$5,000
Activity 3.2 dissemination	\$9,000		\$2,000	\$2,000
Activity 3.3 information tools	\$8,000		\$5,000	\$5,000
Activity 4.1 regional capacity needs study	\$33,000			
Activity 4.2 stakeholder partnerships	\$10,000			
Project management				
Monitoring & Evaluation	\$15,000		\$35,000	\$35,000
Project closure	\$10,000		\$10,000	\$10,000
Total	\$1,000,000	\$616,841	\$383,159	\$1,000,000

4.4 Efficiency and effectiveness of the institutional arrangements including Government's participation

34. The institutional arrangements for the project were unusual but largely appropriate for a small-scale project; project delivery was more cost-effective and flexible, but lacked outreach to higher government levels in some countries. FAO's coordination and oversight was relatively remote. An effective oversight body for the project did not exist; even the Steering Committee seemed to follow rather loose definitions.

35. Government commitment to, and ownership of, the project varied between countries. Given the relatively small sums involved, the project operated often at the operational level of a country's administration and often found enthusiastic response.

36. By developing expertise in obsolete pesticide removal among government and non-government staff (e.g. consultants who joined the project from MKI partner organizations in the region), the project effectively raised through FAO international expertise and relevant NGOs (IHPA and MKI) government awareness of, and capacity to deal with, obsolete pesticides.

37. The longer-term effect of this project on government ownership is difficult to assess as it was intended as a first phase of a longer term involvement by FAO in the countries. The project experienced difficulty in identifying appropriate and willing 'experts' in under-resourced government departments to participate in trainings which often included physical work in hazardous and uncomfortable conditions - some refused to work in Zone 1 during field exercises. The gap between existing practices and international standards may take time to bridge, and a phased programme responds to this challenge effectively. Participants vigorously expressed the need for full inventory and disposal of wastes, which was not part of this project, but a phased approach increases the time of 'temporary' storage of wastes awaiting final disposal. (This will be more extensively addressed in the EU-funded follow-up project in some EECCA countries.)

38. The microprojects served as a good vehicle to increase ownership, and some countries followed up with budget allocations or political support of their own. For example, Belarus included a repackaging project in its regional environment budget, and issued a decree on OP; Azerbaijan added 200 new bunkers to its polygon, and developed a programme and budget for repackaging remaining stocks (2012-14).

5 Analysis of results and contribution to stated objectives¹³

5.1 Achievements at Outputs level

39. Overall, the project achieved more than its original objectives, particularly in the area of awareness raising and capacity building, through the implementation of micro-support projects which were not envisaged in the original project design. Very important was the contribution of country participants and governments in realising all activities, as only limited resources were available from the project.

5.2 Achievements at Outcome level

40. An overview of the project's achievements is given in the table below.

¹³ The term 'results' includes outputs and outcomes

Table 3. Summary table of project achievement against outcomes

Project objective and Outcomes	End-of-project target	Achievement
Objective Reduced adverse impacts on health and environment from excessive and poorly controlled pesticide use.	At least one high risk POPs and obsolete pesticides stock safeguarded in new containers and secure storage in three countries.	Safeguarding was undertaken in Belarus (148.3 metric tonnes repacked) and in Azerbaijan (more than 65 metric tonnes). Safeguarding undertaken in Georgia (3.5 tonnes - 5 big bags filled) Armenia burial site recovered Number of other inventory, safeguarding and transport activities undertaken in the countries during project lifetime but through other funds
Outcome 1: Enhanced Awareness among participating countries on prevention and disposal of POPs and obsolete pesticides	At least two International HCH and Pesticides (IHP) Forum meetings	IHPA Fora held in 2009 (Brno) and 2011 (Gabala). Azeri Parliament and Baku University display
	Awareness-raising plans developed in each country	Awareness-raising plans written for all countries which participated in one of the two awareness-raising seminars Time Bomb book- + in Russian, Armenian, Georgian, Mongolian, Azeri Steering Committee GIZ-IHPA-AN Exhibition “Obsolete and POPs Pesticides in Eastern Europe, Caucasus and Central Asia” Armenia– calendar leaflet, Toxic Free Future poster, 6 newspaper articles, TV and radio broadcasts, 719 people at 30 seminars Georgia TV programme Azerbaijan – 3 regional events @ libraries, with farmers attending Macedonia – 2 workshops (Skopje Fair, Velus) with 70% of pesticide companies attending, leaflet for professionals handling and storing OPs Moldova - The Eliminators in Moldova pamphlet
Outcome 2: Strengthened Capacity for POPs and obsolete pesticide prevention and disposal	3 countries will have developed a management plan	EMP training has been held 18-23 June 2012 in Belarus with 9 countries participating. Romania – new legislation to simplify access to EU structural funds Azerbaijan – 2012-14 Ecological Plan Belarus – allocation 2.1 billion BLY for cleanup of buried pesticide sites (2013/4) Belarus USD 70'000 to their 2011 budget to repackage 140 t of Ops
	3 Pilot/ demonstration projects on inventory, risk assessment and safeguarding of POPs/ obsolete pesticides completed	Safeguarding in Belarus and Azerbaijan done Inventory and emergency repackaging in Georgia Azerbaijan inventory Macedonia – inventory, “Cemenavodstvo” and “Ohis” sites near Skopje – total pilot project + micro-support 41,399.75 litres, 62,856.13kg + 22.15 m3. Lobbying - Armenia burial site + inventory
	Resource documents available in Russian	Translation of EMTK Vol. 1-4 as well as inventory and empty container guidelines into Russian done. Documents currently in publication process Macedonia: A manual on the management of OP and POPs FAO Guideline on Management of Small Quantities of OP (Azeri) US EPA Regulation on Soil Remediation and Non-combustion Technologies (Azeri) FAO's Empty Containers Guidelines translated into Russian
		Testing of the rapid site assessment tools – Azerbaijan – with good results (ID 11/37 pesticides tested, need to include former SU products in database) Panels IHP Forum 2011 - “Rapid Identification of Unknown Substances found in Pesticide Stores”, “Risk Assessment Methodologies for Pesticides Stores and Burial Sites” Moldova experience 50 sites assessed for burial, total 1600 sites mapped
	6 training workshops on different topics related to obsolete pesticides held.	9 trainings held: 93 people trained in total Mongolia (6/10/11), Ulaan Baator, 20 regional agricultural inspectors Training others in own country Belarus –officers from regional inspections and agricultural enterprises - later on involved in repackaging in Minsk and Grodno regions; additional 2 people on PSMS in Vitebsk Azerbaijan –three others PSMS

Project objective and Outcomes	End-of-project target	Achievement
		Romania – training local authorities (30% reached) Macedonia - private sector companies, customs
Outcome 3: Framework for exchange of information and experience among countries on the prevention and disposal of obsolete pesticides	Agreed mechanism for information exchange established.	Experience exchange at Steering Committee in Belarus in May 2011 and IHP Forum 2011. obsoletepesticides.net website and related discussion forum under final development Experience exchange at all meetings and trainings – CDs with documents Study tour in Moldova Skype and email contacts directly between project participants. Increase in use of FAO website – for new pesticides more than OP
Outcome 4: Greater stakeholder involvement in prevention and elimination of POPs and obsolete pesticides	Links with at least 3 additional stakeholders established	Discussion held with EU Commission resulting in funding for a follow-on project Side-event at 63rd session of the World Health Assembly. Side –event at Stockholm CoP Side-event at September 2011 Environment for Europe Conference Governments – Belarus Min Ag & Emergency Situations & Ecology; Azerbaijan Inventory Commission, Macedonia Inter-Ministerial group on inventory, Moldova – Min Ag not previously involved in projects; Montenegro and Serbia participants at inventory training, Macedonia customs authority obliged to manage stocks Micro-support projects: Georgia - NGOs participating in project, journalist, TV Armenia –Mayors, Aarhus Centres, teachers, mass media - Azerbaijan – International Resource Complex, local libraries & Baku State University volunteers Macedonia – pesticide traders and users Romania – regional authorities accessing EU Regional Development funds for contaminated sites Private sector – Russian firm (own cost) in repackaging training Belarus; Inventory at 10 Macedonian companies (micro-support)

41. The outcomes achieved by the project were due to a combination of NGO commitment coupled with a good network of contacts, and good use made by the project of FAO’s normative and knowledge products.

5.3 Gender equality

42. Gender was not mentioned in the project document, and therefore no gender issues were reflected in objectives, design, identification of beneficiaries and implementation. Likewise, there were no gender equality considerations taken into account in project management; however, women were included in the project’s technical backstopping, and women were also in a leading position among several of the project’s in-country counterparts, as well as the non-government stakeholders e.g. Armenian Women for Health and Healthy Environment NGO.

43. The neglect of gender issues in beneficiary identification is probably owed to the fact that the health risks from POPs affect people indiscriminately.

5.4 Capacity development

44. Some specific examples of new knowledge/ capacity that participants cited include: repacking of liquid pesticides (Belarus); personal safety and PPE (Georgia, Belarus); environmental factors (store conditions) to assess risk of stores (Moldova). The situation of many stocks in Eastern Europe is very poor and high levels of health and environmental protection should be used. While the use of PPE was widely adopted and appreciated, other practices such as monitoring health status of workers, availability of ambulances and emergency support, insurance, site zoning, road transport guidelines, etc, do not appear to have taken hold so strongly (e.g. Georgia emergency repackaging exercise, trainer feedback after pilot projects).

45. The long term capacity build during this project is difficult to assess as it was intended as a first phase of a longer term involvement by FAO in the countries. The project experienced difficulty in identifying appropriate and willing ‘experts’ in under-resourced government departments to participate in trainings which often included physical work in hazardous and uncomfortable conditions - some refused to work in Zone 1 during field exercises. The gap between existing practices and international standards may take time to bridge, and a phased programme responds to this challenge effectively. Participants vigorously expressed the need for full inventory and disposal of wastes, which was not part of this project, but a phased approach increases the time of ‘temporary’ storage of wastes awaiting final disposal.

46. The value of a capacity building project with limited field work, as in the original model, and before the additional pilot activities took place in the form of the micro-support projects, for this type of hands-on activity is questioned by trainers:

- “It is very important that implementation of inventory training in country takes place within a period not later than 12 weeks after completion of the ToT. The longer one waits the more difficult it will become and refreshing of the training and the materials will be needed” (ToT training Minsk 2010)
- “As an overall conclusion it has to be noted that prior to a national inventory another PSMS (only practical) training should take place in order to refresh the now learned skills and to facilitate the accurate and practice-orientated outcome of the PSMS based inventory that would serve as a basis to a repackaging campaign and final destruction of obsolete stocks. Probably the best result could be achieved when connecting field practice (visiting a store and carrying out the inventory) and PSMS practice.” (PSMS 2 May 2011)
- “Following the work both in Belarus and Azerbaijan the consultant does not believe that this type of training model benefits safeguarding at large. (The training model is an international event where trainees are put forward by member countries. The event itself is held at one of the participating countries for demonstration).” (Azerbaijan repackaging Dec 2011)

47. These concerns seem to be validated by the number of participants who were not confident that they can apply their learning in their own country.

48. There is limited indication that PSMS can be widely applied as a result of this project. Some participants felt that more training is needed, or that they are not yet able to

enter data. In Belarus, a (publically available) database controls pesticide use so PSMS may not be so relevant. The high occurrence (70% in Belarus) of mixtures would need to be analysed in order to add to PSMS. Only one country brought actual inventory data to EMP training.

49. Capacity for targeted awareness raising has been developed and demonstrated by the micro-support projects, e.g. very specific but diverse targets included private companies (Macedonia), local authorities (Romania), farmers (Azerbaijan). A positive aspect was that there were specific messages and results from each project.

50. The project developed capacity in programme management, training and communicating on chemicals issues, as well as technical capacity. The active role of participants in jointly selecting micro-projects, designing and delivering the micro support projects developed country ownership; the repacking conducted in Georgia by the team is a good example. There were (self-financing) requests to participate in training events by participants from Montenegro, Serbia, and from the private sector in both Russia and Belarus, and project participants disseminated their knowledge in their country, both as part of the micro-support projects but also as part of their own function – inventory, repackaging, and PSMS.

5.5 Partnerships and Alliances

51. The project was an unusual alliance between FAO and three NGOs, most important among which was Green Cross. The resulting partnership contributed to an efficient programme delivery: it provided an appropriate mix of flexibility through NGO working methods and networks, and project acceptance through FAO's undisputed expertise in OP matters.

6 Analysis by evaluation criteria

6.1 Relevance

52. The project was highly relevant: at the time of project formulation some of the Central European and EECCA countries had been aware of the problems with large stocks of obsolete pesticides, associated wastes and contamination of soil and ground water for many years and had been looking for solutions. In some cases, countries had taken action on their own or with external assistance to address the situation. However, the problems were not being addressed adequately either in terms of scope or in terms of standards applied to remediation activities.

53. Most EECCA countries had ratified the Stockholm Convention on Persistent Organic Pollutants and the Basel Convention on transboundary movement of hazardous waste, and many had ratified the Rotterdam Convention on the Prior Informed Consent process for trade in certain hazardous chemicals. The project could support the effective implementation of these conventions and encourage their adoption in countries that had not yet ratified them.

54. In addition, many individual governments among the EECCA countries had addressed to FAO asking for assistance in eliminating obsolete pesticide stocks or in addressing other aspects of pesticide management.

55. All countries participating in the project had completed or were in the process of completing their NIP. Countries highlighting POPs pesticides stockpiles as an issue to be addressed could immediately benefit from the project and would thus be in a better position to prepare for a follow on project to eliminate and prevent POPs stockpiling and use.

6.2 Efficiency

56. Given the limited resources available, the project was an example of a highly cost-effective approach: the project's implementation arrangements achieved their intended purpose. The project had well-prepared work plans, handled most planned activities well (except those for which there external constraints or which had been dropped by consent), and also established a functioning internal review processes¹⁴.

57. The financial resources of the project were efficiently and very transparently managed. GC Switzerland provided detailed and comprehensive budget and expenditure information.

6.3 Effectiveness

58. Overall, the project achieved more than its original objectives, particularly in the area of awareness raising and capacity building for inventory, through the implementation of additional pilot activities through the "micro-support projects" which were not explicitly envisaged in the original project design but conducted in Armenia, Azerbaijan, Georgia, Macedonia, and Romania. In line with changing circumstances and revised priorities, some of the original allocations were altered in consultation with the project's stakeholders.

6.4 Sustainability

59. The project was not intended to be sustainable per se. Rather, it was supposed to raise awareness and start pilot activities, which could then be taken up by larger follow-up projects. The existence of an EU-funded project for several of the participating countries proves the validity of this approach.

60. However, it is surprising that prevention – which could have a significant impact on the avoidance of stockpiles – was mentioned almost accidentally in the project document. Consequently, there was little to no prevention activity in the project. At the same time, the project has inspired or reinforced some government initiatives which will have a longer-lasting effect (e.g. Romania container management system, Armenia – entities legally required to report to authorities on stocks annually, Belarus – 100% to use FAO standards in guidelines for OP management).

¹⁴ However, information uploaded to FAO's FPMIS was initially (up to the time of the evaluation mission) very limited.

6.5 Impact

61. The repackaging of high risk sites has been completed with minimal risk to workers, communities and environment. However, in most cases the stocks are in temporary containers (big bags, overpack drums, polygons...) and will eventually be a risk again.

62. The application of international standards and a systematic risk-based approach was widely cited as the main difference the project has made. For example, Azerbaijan had never previously analysed mixed pesticides prior to repackaging, and the country has introduced SOP-boards with work schedule and zoning plans. Moldova had never previously documented store conditions, and Belarus never used PPE.

63. The micro-projects have resulted in demonstrable impact in terms of inventoried/safeguarded tonnes, application and consolidation of training, and the project found appropriate ways to implement its activities in different settings; e.g. in Belarus project staff managed to overcome bureaucratic hurdles for import of equipment. Working with local administrations and stakeholders was also an effective approach with extensive activities and outreach with minimum budget.

64. While the individuals visited by the Evaluation Team (Belarus, Azerbaijan, where pilot projects were conducted) did appear to have used their training in practice, others did not feel that they were able to do so, limiting the impact of such projects due to limited human resources in government positions. Engagement in improved practices was largely a result of individual persons, so to mitigate the risk of these individuals moving on, the project also trained people in the NGO and academic community.

65. Most participants appreciated the regional character of the project: the exchange of information at workshops, direct contacts. Countries were encouraged to share the reality of their situation if they see others doing so – otherwise they may try to hide their problem

66. In some countries, the government has demonstrated high level support and budget allocations to deal with obsolete pesticides, although adoption of the standards in national institutions and standard operating procedures is slow. However, these commitments are insufficient to tackle the scale of the problem in the way prescribed by international standards

67. The public awareness campaign of the project was important given the basic level of knowledge by communities and the public at large, of obsolete pesticides, their stores and their history.

7 Conclusions and Recommendations

7.1 Conclusions

68. Overall, the project achieved more than its original objectives, particularly in the area of awareness raising and capacity building for inventory, through the implementation of additional pilot activities through the “micro-support projects” which were not explicitly

envisaged in the original project design but conducted in Armenia, Azerbaijan, Georgia, Macedonia, and Romania.

69. **Outcome 1 Awareness:** The project was successful in raising awareness among governments of the urgency and approach to dealing with obsolete pesticides, at all levels. After the 2nd IHPA Forum, the hosting country Azerbaijan declared its commitment to becoming a regional leader in management of obsolete pesticides, concretely with a declaration and national plan. In Romania, workshops at local administration level were intended to increase applications for POPs and pesticide management issues to EU structural funds; however data on the success of these meetings was not available by the time of the Evaluation.

70. Micro-support activities in five countries had an impressive public outreach including TV shows, public meetings in libraries, and improving public access to information on stockpiles. These projects found an impressive level of knowledge and willingness of populations to discuss about OP stockpiles and sites. It is not clear whether the awareness raising had a clearly defined objective in each case (e.g. reporting OP or adopting IPM) and this level of impact could not be evaluated in the current evaluation.

71. **Outcome 2 Capacity Development:** All the planned training and pilot projects were successfully completed, to high levels of satisfaction and enthusiasm of participants¹⁵. Two pilot repackaging projects (Belarus and Azerbaijan) and one on repacking in Georgia took place; inventories were conducted in Armenia, Georgia and Macedonia.

72. The Environmental Management Plans training was held late in the project timeframe (June 2012) and was viewed by some participants as very complex and not very easy to implement. Azerbaijan and Belarus have national plans for managing obsolete pesticides, and Romania has identified and acted to simplify access to EU funds to deal with their stocks.

73. **Outcome 3 Information Sharing:** The project increased information sharing between participants, but mainly through direct contact at meetings and on an ad-hoc, on-demand basis between individuals through Skype and email – the weakness with this being that partners did not always know what was available to ask for. Participants shared information for specific needs, e.g. development of national plan 2012-14 in Azerbaijan, and of micro-support proposals.

74. The development of a more systematic information sharing mechanism – the obsoletepesticides.net site – was delayed, and not used to facilitate information exchange during the project. The site is based on a previously created MKI wiki, decentralised and user-generated content (from project management, ministries, FAO, NGOs, etc), including OP projects in the Former Soviet Union region; reference materials; discussion board; and database of individuals trained in obsolete pesticide management. Due to legal issues (mainly about the extent to which FAO could be seen as endorsing content) this has not been launched and is not being used at the time of the External Evaluation.

¹⁵ However, it appears that more in-country refresher training would have been helpful to raise the confidence and capacity of some trainees.

75. **Outcome 4 Stakeholder Involvement:** The project achieved a significant result in gaining EC support and involvement in a regional project to dispose of obsolete pesticides, with a budget of €8.5m in 10 countries. The project was promoted at the European Parliament, Environment for Europe conference, Stockholm 5th Conference of Parties, and World Health Assembly, and this latter event resulted in a WHO Recommendation. However, there is no evidence of any practical involvement of health stakeholders in obsolete pesticide projects as a result of this Recommendation.

76. The micro-support projects were very successful at involving stakeholders in each country. Firstly, government support was leveraged, mostly at a technical staff level rather than official Ministry level, but with significant level of ownership – for example, organising trainings, and contribution to field activities (inventory, awareness, ambulance for repackaging) – this was evident given the scope and achievement of project budgets of only €7,500. Secondly, the projects themselves were very effective in creating functional links and roles for stakeholders, from local administrations, mayors, libraries, etc.

7.2 Recommendations

77. As the project as such will not have direct follow-up, the recommendations below are of a more general nature, to be considered e.g. in the FAO-implemented EU project mentioned above.

To FAO, NGOs and potential donors

78. Future projects should include: a. building capacity for rapid assessment of pesticides in the field; b. container management technologies¹⁶; c. developing appropriate skills at the local level to formulate projects and successfully obtain funding, including from national and district level governments.

To FAO, NGOs and potential donors

79. Promote flexibility in applying international standards: a. recognizing existing government actions to deal with OP in their own programmes, provide tailored support on request aiming to gradually bring national regulations, planning and material provisions for better practices in line with international standards – this may take many years and require a long term presence of FAO in the country; b. further deploy micro-support and NGO partnership approaches to provide flexible support with high levels of leverage, while recognizing the administrative burden of micro project management (selection, contracts, logframe).

¹⁶ Prevention – which could have a significant impact on the avoidance of stockpiles – was mentioned almost accidentally in the project document. Consequently, there was little prevention activity in the project.

To FAO and NGO partners

80. New projects should plan to remove pesticides as far as possible¹⁷ - this is the main demand by countries – and FAO, together with NGO partners in the field, should lobby donors on the need for larger-scale funding needed for full disposal programmes regionally.

To FAO and NGO partners

81. The information exchange platform obsoletepesticides.net should get online before the end of the project, and a solution should be sought to keep it running. This requires also a clarification of the roles of how FAO and its partners can share editorial control while respecting FAO guidelines, and it should involve a commitment to ensure that all data of the project (including individuals and institutions involved at local levels) is not lost.

To FAO and NGO partners

82. As knowledge about obsolete pesticides continues to be limited, also future projects should still contain awareness raising activities: a. list AR as an activity for each outcome – e.g. under repackaging, AR is required to prevent local populations resisting project activities; b. use libraries and local authorities' schools or health services as venues for AR activities; c. consider targeting AR materials for politicians in parallel with general AR initiatives

To FAO, NGO and government partners

83. In future projects, involve health ministries, based on the WHO Recommendation on OP; e.g. seek to raise their awareness of obsolete pesticide stores or burial sites and encourage them to monitor/ study possible impacts on health of communities; clearly identify roles for them in disposal/ prevention/ awareness raising activities (e.g. posters at health centres, poisoning info, etc)

8 Lessons Learned

84. The lesson learned from this project is perhaps the insight that closer FAO/NGO collaboration can yield good results, especially in situations where FAO has little presence. However, reliance on NGO networks can also lead to a situation where government recognition of the initiative is less automatic, and especially government may be reluctant to follow up in terms of drafting regulatory frameworks, establishing norms etc if they do not see the association with FAO. Legal and insurance issues associated with the absence of a formal project agreement with governments also need to be addressed.

¹⁷ FAO could consider avoidance of multi-phase projects (where inventory/safeguarding is phase 1, leaving disposal to a future phase 2 project – which may take a long time to materialize), preferring instead a country project, but with full disposal.