

# Terminal Evaluation of the GEF - UN Environment Project "Development of Mercury Risk Management Approaches in Latin America" GEF ID: 5494

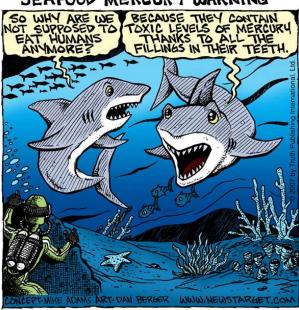
# **Final Report**







# COUNTERTHINK "SEAFOOD MERCURY WARNING"



**Evaluation Office of UN Environment August 2019** 



#### **Evaluation Office of UN Environment**

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"Development of mercury risk management approaches in Latin America (Argentina, Ecuador, Nicaragua, Peru and Uruguay)"
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Sincere appreciation is also expressed to the project national implementing coordinators who took time to provide comments to the draft report. The Evaluation Office of UN Environment would also like to thank to the environmental authorities of the involved countries for their commitment for the successful implementation of this project.

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#### **ABOUT THE EVALUATION**

Joint Evaluation: No

Report Language(s): English

**Evaluation Type:** Terminal Project Evaluation

Brief Description: This report is a terminal evaluation of a UN Environment-GEF project implemented between 2014 and 2018. The project's overall development goal was to strengthen the capacity of participating LAC countries (Argentina, Ecuador, Peru, Nicaragua and Uruguay) to identify mercury sources and the priority actions to be undertaken. The project included the achievement of 4 outcomes: i) Information needs identified in participating countries and in the region; ii) Comprehensive information on mercury sources and releases enable a better understanding of mercury risks to human health and the environment for participating countries; iii) Enhanced understanding of mercury priority sources and capacity for mercury management through the development/ identification of national mercury risk management approaches including the identification of management gaps and needs and, iv) Lessons learned available and shared regionally allow better practices in future projects.

The evaluation sought to assess project performance (in terms of relevance, effectiveness and efficiency), and determine outcomes and impacts (actual and potential) stemming from the project, including their sustainability. The evaluation has two primary purposes: (i) to provide evidence of results to meet accountability requirements, and (ii) to promote learning, feedback, and knowledge sharing through results and lessons learned among UN Environment, the GEF and their executing partner BCCC-SCRC and the relevant national environmental authorities of the project participating countries.

**Key words:** national inventories, risk management approaches, UNEP Toolkit for Identification and Quantification of Mercury Releases; lessons learnt; mercury priority sources; national mercury plans; project terminal evaluation; Latin American and Caribbean Countries; Basel Convention Coordinating Centre and Stockholm Convention Regional Centre for Latin America and the Caribbean Region (BCCC-SCRC); Small-scale Gold Mining (ASGM); mercury releases; legal framework; temporary storage; capacity strengthening; GEF; Minamata Convention.

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# **Project Identification Table**

GEF Project ID:	5494					
Implementing Agency:	UN Environment	Executing Agency:	Stockholm Conv Latin America a (BCCC-SCRC)	on Coordinating Centre and vention Regional Centre for nd the Caribbean Region hosted by Uruguay		
Sub-programme:	Chemicals and Waste (Harmful Substances and Hazardous Wastes)	Expected Accomplishment(s):	i) MTS 2014-2017: Strategic Direction "Harmful substances and hazardous wa (to minimize the impact of harmful substan and hazardous waste on the environment human beings) and its expediaccomplishments (EA): 1)"Enable environment: Countries increasingly have necessary institutional capacity and poinstruments to manage chemicals and was soundly including the implementation related provisions of the multilate environmental agreements"; 2) "Chemic Countries, including major groups stakeholders, make increasing use of scientific and technical knowledge and to needed to implement sound chemic management and the related multilate environmental agreements"; ii)			
UN Environment approval date:	23/03/2014	Programme of Work Output(s):	<ul> <li>POW 2014-2015: Sub-Programme</li> <li>"Chemicals and waste" and the indicator f</li> <li>achievement (i): "Increase in number countries reporting the adoption of policies f</li> <li>the sound management of chemicals ar waste, with the assistance of UNEP"</li> </ul>			
GEF approval date:	18/11/2013	Project type:	MSP			
GEF Operational Programme #:		Focal Area(s):	Persistent Organic Pollutants/Chemicals			
		GEF Strategic Priority:		tive 3: Pilot Sound Chemicals nd Mercury Reduction		
Expected start date:	23/03/2014	Actual start date:	9/06/2014			
Planned completion date:	26/05/2017	Actual completion date:	31/12/2018 (acc	cording PIR FY 2018)		
Planned project budget at approval:	\$3,810,434	Actual total expenditures reported as 31 Sept 2018:	817,306 (only G	EF)		
GEF grant allocation:	\$916,000	GEF grant expenditures reported as of 31 Sept 2018:	\$817,306			
Project Preparation Grant - GEF financing:	N/A	Project Preparation Grant - co- financing:	N/A			
Expected Medium- Size Project/Full- Size Project co- financing:	\$1,980,400	Secured Medium- Size Project co- financing:	\$ 986,469			
First disbursement:	9/06/2014	Date of financial closure:	30/06/2018			
No. of revisions:	1	Date of last revision:	09/02/2017			
No. of Steering Committee meetings:	2	Date of last/next Steering Committee meeting:	<b>Last</b> : 18/10/2016	Next:		

Mid-term Review/ Evaluation (planned date):	9/12/2015	Mid-term Review/ Evaluation (actual date):	19/10/2016
Terminal Evaluation (planned date):		Terminal Evaluation (actual date):	May-2018, March 2019
Coverage - Countries:	Argentina, Ecuador, Nicaragua, Perú and Uruguay	Coverage - Region(s):	Regional – Latin America and the Caribbean
Dates of previous project phases:	N/A	Status of future project phases:	N/A

<b>Abbreviations</b>	table
Acronym	Definition
ASGM BCRC Argentina	Artisanal and Small-scale Gold Mining Basel Convention Regional Centre for South American Region for Training and Technology Transfer
BCCC-SCRC  CDC CIEMAT CNR DIGESA DINAMA EA EOU GEF GIHON GPO IDB INIGEMM INTI LAC LATU M&E MAE MAE MARENA MC MIA MINAM MINAM MINEM MOU MSP MTS MVOTMA N/A NGO PIR	Training and Technology Transfer  Basel Convention Coordinating Centre and Stockholm Convention Regional Centre for Latin America and the Caribbean Region (Uruguay) Center for Disease Control Energy, Environmental and Technological Research, Spain National Research Council of Italy Directorate-General of Environmental Health and Food Safety, Peru National Directorate for the Environment, Uruguay Executing Agency Evaluation Office of UN Global Environment Facility Thimerosal producing company in Argentina General Public Opinion Inter-American Development Bank Geological-Miner - Metallurgical National Research Institute, Ecuador National Institute of Industry Technology of Argentina Latin America and the Caribbean The Technological Laboratory of Uruguay Monitoring and Evaluation Ministry of Environment of Ecuador Ministry of Environment and National Resources of Nicaragua Minamata Convention Minamata Initial Assessment Ministry of Environment, Peru Ministry of Environment, Peru Ministry of Environment, Peru memorandum of understanding Medium Size Project Medium Term Strategy Ministry of Housing, Land Planning and Environment of Uruguay not available Non-Governmental Organization project Implementation Reviews
POW PPG PRC	Programme of Work Project Preparation Grant Project Revision Committee
ProDoc PSC SENAE	Project Document Project Steering Committee National Customs Service of Ecuador
STAP SUNAT	Scientific and Technical Advisory Panel (GEF) Superintendence of National Customs and Tax Administration, Peru
TE ToC	Terminal Evaluation Theory of Change

Theory of Change Terms of Reference ToC TOR UNDP

United Nations Development Programme United Nations Environment Programme UNEP / UN

Environment

UNITAR United Nations Institute for Training and Research

# **Executive Summary**

#### Evaluation objective and scope

- 1. The UN Environment evaluation office appointed an international consultant to carry out the terminal evaluation of the GEF medium-sized project "Development of mercury risk management approaches in Latin America" (GEF ID 5494). The project involved 5 participant countries: Argentina, Ecuador, Peru, Nicaragua and Uruguay, and the "Basel Convention Coordinating Centre and Stockholm Convention Regional Centre for Latin America and the Caribbean Region" (BCCC-SCRC), located in Montevideo, Uruguay was the project executing agency, whereas UN Environment acted as GEF implementing agency. Nicaragua left the project in 2016, since it considered that the assigned resources were insufficient to cover the country's needs and it would like to prepare a more comprehensive mercury project.
- 2. This project started implementation in June 2014, and it was planned to end by June 2017 (36 months), but issues in its implementation led to activities being completed in July 2018 (approx. 54 months). GEF resources allocated were US\$ 916,000 and co-financing commitments amounted to US\$ 2,594,434 (US\$ 3000,000 were deducted from Nicaragua contribution). GEF resources spent until September 2018 amounted US\$ 817,306 (89%) and co-financing was approx. US\$ 986,469 (38%, excluding Nicaragua).
- 3. The main project objective was to strengthen national capacities of participant countries to understand mercury issues, identify its sources and identify priority actions to be undertaken to protect human health and the environment. To reach this objective, the following 4 outcomes were defined: i) identification of information needs in each participant countries; ii) comprehensive information on mercury sources (elaboration of national inventories mainly); iii) elaboration of national risk management approaches in key priority sectors; and iv) lessons learnt distilled and shared regionally and worldwide.
- 4. Terminal evaluations (TE) are mandatory for all GEF projects<sup>1</sup>, and they are aimed to assess projects' efficiency and effectiveness in achieving their intended results, provide evidence for accountability purposes and to share experiences and lessons learnt distilled from implementation of these projects and apply them into the design and implementation of new projects. Therefore, this TE should encourage thinking and learning among UN Environment staff and key project stakeholders.
- 5. The evaluation reports evidence of attribution between UN Environment's intervention and direct outcomes. The TE assessed nine evaluation criteria of relevance, quality of project design, nature of the external context, effectiveness (delivery of outputs, achievement of direct outcomes, likelihood of impact), financial management, efficiency, monitoring & reporting, sustainability, and factors and processes affecting project performance as defined by the UN Environment methodology. The evaluator should rate each of these criteria using a six points predefined scale (see *Evaluation Methods* for details).
- 6. Terms of Reference for this TE also included additional strategic questions to be answered and are related with: i) adaptive management (how the project responded to changes in each national' project environment (changes in priorities and authorities) while providing appropriate guidelines to participant countries; ii) the extent to which expert knowledge made available was appropriate to steer the intervention in each individual country; and iii) the extent to which data collected and made available to the project contributed to the development of national action plans and; iv) the extent to which the

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<sup>&</sup>lt;sup>1</sup> With the exception of small enabling activities.

cooperation with the project "Development of Minamata Initial Assessment in LAC" increased the knowledge base of the intervention to inform the development of feasible action plans in the project countries.

#### key features of performance (strengths and weaknesses)

- 7. In despite of delays experienced during project execution, the TE evaluation found some key features in project management that made the difference when overcoming barriers and difficulties found in each of the participant countries.
- 8. The decision of executing this project with the GEF Enabling Activity project "Development of Minamata Initial Assessment in LAC (hereafter called the "MIA project") was relevant to expand the exchange of knowledge and experiences among the different participant countries (5 in this project, plus other 4 from the MIA project). Although it cannot be assessed in detail at this time, this decision led to some savings in costs (mainly in accommodation, venues, air tickets, international consultants) and time (joint workshops and activities needed to be organized just once, not twice).
- 9. Activities for developing risk assessment approaches and data collection to feed the national risk management plans (Component 3) were replaced by activities focused in the strengthening of national analytical capabilities (i.e., training, exchange, inter laboratory exercises), monitoring of mercury in air, and the elaboration of national action plans. These changes brought this project closer in scope to the MIA project and facilitated their joint implementation.
- 10. National project coordinators took the key decision that BCCC-SCRC could manage the funds assigned to each participant country that unblocked the funds transfer, which resulted in significant improvements in project performance and disbursements.

#### Main findings of the evaluation

- 11. Regarding the findings related with the nine UN Environment evaluation criteria, it can be stated that the project is still <u>relevant</u> to UN Environment, GEF and participant countries and mercury issues are being incorporated in the agenda and planning of all project participants. The <u>project design</u> presented some flaws during its elaboration and are related with the lack of proper indicators for results, lack of a Monitoring and Evaluation (M&E) plan, identification of financial intermediates in each country, and an ambitious scope in component 3 that was not possible to implement at this time.
- 12. **Effectiveness** of the project was rated satisfactory, since its objectives, outcomes and products were reached in each of the countries and additional activities would be performed thanks to the savings resulted from joint implementation with the MIA project. The use of the toolkit I its different versions (Ecuador V2017, Argentina and Uruguay V2015 and Peru V2013) was of critical importance in the elaboration of the national inventories, since it provided a standard method to determine mercury sources. However, its low user-friendly feature and high learning curve, along the lack of guidelines on how to collect data to feed this tool would have a negative impact on **project efficiency**.
- 13. Although the project reached all its outcomes and all countries have the capacity to elaborate actions plans, inventories, etc., its <u>likelihood of impact</u> might be limited due to the high rotation of government officials and authorities, institutional limitations found in the countries and the difficulties of information holders to share their information would prevent the full use of the skilled personnel trained by the project, but main drivers like national project coordinators are still working in government and international funding are still present in each country. It is worth noting that Peru is the only country which approved a regulation

establishing its national action plan for the application of the Minamata Convention in the country.

- 14. The <u>financial management</u> followed the standard guidelines and report formats used by UN Environment. However, the financial information was presented in general budget-line categories that do not shows expenditures by project components required by GEF projects, and the same is applied to co-financing reports. With these formats, it is difficult to assess the rates of disbursements by year and components, and re-allocations of resources among categories. The above made it difficult to assess <u>project efficiency</u> since costs related with project extension and savings obtained by joint implementation cannot be calculated properly, even having in mind that there were important savings derived from merging management of both projects.
- 15. Regarding <u>sustainability</u>, all countries have stable institutions, but national financial resources to continue mercury activities are scarce in all countries, and political issues, such as presidential elections and changes in political could lead to a slow-down in mercury related activities in the short and midterm.

#### Main conclusions

- 16. The main conclusion is that despite of delays experienced during implementation that impacted project performance, project objectives and outcomes have been achieved and additional important activities would be implemented thanks to project management that reacted properly to complex changes in external conditions. All countries have strengthened their capacities and ability to identify right policies to comply with their commitments under the Minamata Convention (all participant countries have ratified this convention).
- 17. The changes introduced to the project that improved its relevance, together with the joint implementation of the MIA project resulted in an expanded exchange among participating countries and a source of resource savings that facilitated the implementation of additional activities that favoured all participant countries.
- 18. Quarterly reports and PIR templates from UN Environment need improvements in order to show project progress according to its components. The same applies to financial reports, where adjustments in the templates that are currently used are necessary to align them with GEF requirements for financial analysis used in a TE.

#### Recommendations

- 19. As final project reports are still underway (PIR, Financial Report, Project Final Report), it is suggested that these describe achievements by project component, a description of main barriers identified and the adaptive management approaches adopted, a clear explanation of the changes introduced to the project and the advantages of the joint implementation approach used. In addition, as the project audit requirements have not been fully met, the Executing Agency should complete the remaining audits and provide the reports to UN Environment.
- 20. If there are still some funds remaining, activities for validating the figures obtained in the inventories among government and private sector stakeholders at each national level is recommended, in order that all have a common understanding of the main mercury sources and priorities. This exercise would include a draft schedule on updates and responsibilities for each stakeholder in the process of elaborating and validating inventories in the future.
- 21. An upgrade for the UN Toolkit for assessing mercury releases would be needed as all interviewees remarked its usefulness, but also its low user-friendly characteristics resulting from it being a large excel worksheet.

#### Selected lessons learned

- 22. As the absence of project intermediates had a significant impact on project performance, identification of, and appointments for financial institutions that would manage national funds should carried out during elaboration of projects as standard practice in order to avoid potential delays during execution.
- 23. UN Environment should elaborate new formats for financial reports (expenditures and co-financing) in line of what is required in GEF evaluations, this is, annual budgets and expenditures by project component and sub-component. In the same way, letter templates for co-financing commitments would be developed to show exactly the project components where these resources will be allocated.
- 24. As the M&E plan was not properly included in the project design, introduction of guidelines for these plans should be included in the project document as standard good practice.
- 25. When savings by joint implementation from projects of similar scope are detected, accountability reflecting these savings for each project should also be set in place to track and identify these savings.
- 26. Despite of the usefulness of the toolkit used to elaborate national inventories, its lack of user-friendly features and a language not well aligned with some Minamata Convention's concepts, would prevent a wider use of this tool among important sectoral stakeholders due to its high-learning curve. An upgrade for the UN Toolkit for assessing mercury releases would be needed.

#### Overall project ratings

27. The overall evaluation rating is "Moderately Satisfactory" for this project, and a summary of main items used for this evaluation is shown in the following table. A detailed description for these ratings can be seen in Section VI.

E	valuation criteria	Summary Assessment	Rating
А	Strategic Relevance	Project aligned with main UN Environment objectives and strategic programs and GEF strategic programs and priorities.  Project is relevant for all participant countries for strengthening their institutional and technical capabilities to comply with MC provisions.  Complementary with current MIA projects and ongoing mercury activities carried out by participant countries.	Highly Satisfactory
В	Quality of Project Design	Project document lacked proper indicators for results, it did not include a M&E plan, did not include adequate gender activities.	Moderately Satisfactory
С	Nature of External Context	None of the countries presented political instability risks, conflicts or natural disasters that would affect project performance.	Favourable
D	Effectiveness	Although the project achieved most of its outputs with a varied degree of success, and delivered some additional ones, project duration was delayed by approximately 2 years. Most outcomes were achieved, and they are important for the attainment of intermediate states, but these still need further impulse from government and private sector stakeholders, thus project's impact is moderately unlikely.	Satisfactory
E	Financial Management	Information provided was not suited to estimate key financing statistics for cost-effectiveness, savings and costs by project components. Communication was smooth, but information on issues regarding UN Environment financial report formats and criteria for financial practices by which BCCC-SCRC would be evaluated was nor properly provided.	
F	Efficiency	Cost and time saving measures and impacts from non-cost extension could not be assessed. Timeliness of project	

E	Evaluation criteria	Summary Assessment	Rating
		implementation was not as expected in the project document, but most of outputs and outcomes were delivered with various degrees of success.	
G	Monitoring and Reporting	A M&E plan was not elaborated, no use of TT during implementation and limited assessment of risks were noted. Reports provided a limited view on project progress.	Moderately Unsatisfactory
н	Sustainability	The participant countries have stable political systems and institutions and changes are not likely to constitute a risk to sustainability. However, ownership is still an issue regarding that sectoral regulations are needed in order to support project outcomes and their financing, financial sustainability is uncertain, since financing to support project outcomes needs new regulations and mercury activities are still relying on international funds. Finally, some key stakeholders have not yet endorsed the results from some national inventories (Health and Energy Ministries in Argentina, the Mining Ministry in Peru, and Health Ministry in Uruguay have not yet endorsed the results from the national inventories) and the project did not elaborate an exit strategy to address these issues.	Moderately Unlikely
ı	Factors Affecting Performance	Initial activities on track during the first 6 months of project implementation is noted, but no early assessment of risks performed. PSC did not assess problems caused by change of authorities or for identification of local financial agencies for funds transfer.  BCCC-SRC showed good adaptive management to solve key issues related with funds transfer to national coordinators, but as a M&E plan was not in place, follow-up was performed just by activity. Outcomes/activities were not categorized and prioritized by importance or critical nature.  Good participation from environmental ministries/agencies, but less commitment from private sector and other government partners was noted.  Outcomes/activities do not have gender/human rights considerations, but they would have high impacts on improvement in human health conditions and awareness for women and other minority groups.	Moderately Satisfactory
		Overall Rating	Moderately Satisfactory

#### I. Introduction

#### **Project Summary**

- 28. The project "Development of mercury risk management approaches in Latin America" (GEF ID 5494) is a GEF medium-sized project that involved five countries: Argentina, Ecuador, Peru, Nicaragua and Uruguay. The project was approved by GEF on 23 March 2013 and it had a further review and approval by the UN Environment Project Revision Committee (PRC) on 20 June 2013. This project got final approval by UN Environment on 23 March 2014. The project was aligned with the UN Environment Chemicals and Waste Sub-programme.
- 29. The project was implemented by UN Environment's Chemicals Branch within the Economy Division and executed by the Basel Convention Coordinating Centre and Stockholm Convention Regional Centre for Latin America and the Caribbean Region (BCCC-SCRC) hosted by Uruguay (Uruguay Centre). National partners implementing the project at local level were the ministries/secretariats of environment from each participant country.
- 30. The project was planned to last three years (June 2014 through June 2017) and have a GEF contribution of US\$ 916,000 and co-financing commitment of US\$ 2,594,434.

#### Objectives and scope of the evaluation

- 31. Terminal Evaluations (TE) are mandatory for all GEF projects, and they are aimed to assess projects' efficiency and effectiveness in achieving their intended results and for accountability purposes. These TE evaluations are also designed to share experiences and lessons learnt distilled from implementation of projects and apply them into the design and implementation of new projects. Therefore, this TE should encourage thinking and learning among UN Environment staff and key project stakeholders.
- 32. According to the Terms of Reference (ToR) for this TE, the evaluation consultant should go beyond of assessing production of deliverables and delivery of outputs, but an understanding of reasons determining project performance is required through this current evaluation exercise, as learning is one of the key principles underlying any evaluation process.
- 33. The evaluation should report evidence of attribution between UN Environment's intervention and direct outcomes of the project. In cases of normative work or where several actors are collaborating to achieve common outcomes, evidence of the nature and magnitude of UN Environment's substantive contribution should be included and/or 'credible association' established between project efforts and the direct outcomes.
- 34. This TE assessed the following nine evaluation criteria as defined in the UN Environment guidelines for evaluations<sup>2</sup>:
- A. Relevance;
- B. Quality of Project design;
- C. Nature of the external context;
- D. Effectiveness (delivery of outputs, achievement of direct outcomes, likelihood of impact);
- E. Financial management;
- F. Efficiency;
- G. Monitoring & Reporting;

<sup>&</sup>lt;sup>2</sup> UN Environment Programme Manual 2018.

- H. Sustainability;
- I. Factors and processes affecting project performance;
- 35. According to the UN Environment methodology, evaluator should rate each of these criteria using a six points predefined scale: Highly Satisfactory (HS); Satisfactory (S); Moderately Satisfactory (MS); Moderately Unsatisfactory (MU); Unsatisfactory (U); Highly Unsatisfactory (HU). Sustainability and Likelihood of Impact are rated from Highly Likely (HL) down to Highly Unlikely (HU) and Nature of External Context is rated from Highly Favourable (HF) to Highly Unfavourable (HU).
- 36. The ToR for this TE also included additional strategic questions to be answered related with: i) adaptive management (how the project responded to changes in each national project environment) while providing appropriate guidelines to participant countries; ii) the extent to which expert knowledge made available was appropriate to steer the intervention in each individual country; iii) the extent to which data collected and made available to the project contributed to the development of national action plans and; iv) the extent to which the cooperation with the project "Development of Minamata Initial Assessment in LAC" increased the knowledge base of the intervention to inform the development of feasible action plans in the project countries.
- 37. The period covered by this TE goes from June 9, 2014 through December 31, 2018 (4.5 years). The project was not required to undertake a Mid-Term Review, but an auto-evaluation exercise was made in October 16, 2016. The project finished its activities in July 2018 and is currently elaborating its final report.
- 38. The results from this Terminal Evaluation are intended to be used by Project Managers executing GEF projects in government institutions, GEF and UN Implementing Agencies. Other target audiences are managers and decision makers from government and private sectors dealing with gold mining, health and environmental issues and searching for sound policies and practices to avoid damages to people and the environment, along high-level technical staff focused in the development of new analytical methods to determine mercury pollution in humans and other environmental matrices (air, water, soil, fish, etc.).

#### II. Evaluation Methods

- 39. This TE was an in-depth review which used a participatory approach whereby key stakeholders were kept informed and consulted throughout the whole evaluation process. Both quantitative and qualitative evaluation methods were used as appropriate to determine project achievements against the expected outputs, outcomes and potential impacts. Evaluation findings and judgements were identified from evidence and analysis supported by documents and stakeholders' interviews. Information was triangulated (i.e. verified from various sources) to the extent possible. Verification of evaluation findings was presented- via a skype conference to UN Environment staff, BCCC-SCRC and project national coordinators and the draft report underwent a throughout review by these stakeholders in order to validate the completeness of the information collected, the logic of its analysis, conclusions and recommendations.
- 40. Quantitative information was taken from progress reports and statistics extracted from them. Qualitative information was also collected from context information and interviews which revealed the adaptive management and adjustments made by the UN Environment, BCCC-SCRC and the national coordinators in order to improve project performance and relevance.
- 41. The evaluation matrix (Evaluation questions matrix) presents broad categories addressed in the TE and key tentative questions/issues reviewed and discussed during the documentary review and interview processes. These questions were useful guidelines, but they were not intended to be a formal survey or questionnaire applied in the same way to all stakeholders consulted, but according to the role played by each relevant stakeholder.
- 42. In the interviews made during the field mission, the evaluator also formulated questions in order to obtain a self-assessment from these stakeholders on what was done by the project and asked if there were other approaches to obtain better project performance or results, missing steps that would have been taken during project, consultation to other actors and their experience using the UN Environment mercury toolkit and its limitations. All these issues were discussed in order to promote learning and thinking on lessons distilled from the project implementation.
- 43. Therefore, the TE consisted of a mix of desk review, in-depth interviews (face-to-face, by Skype or telephone, or email) with relevant UN Environment, BCCC-SCRC and government staff involved in the design and implementation of the project as follows:
- a) Desk Review (see also Annex 5): all relevant contextual information on social-economic situation for each country was considered, inter alia, national regulations related with Hg wastes and compliance with Minamata convention provisions, sectoral gold mining policies, GEF operational programs and guidelines, relevant UN Environment MTS and POW documents;
- b) Project design documents, including those related to the PPG phase; STAP and RPC reviews, project progress and financial reports;
- Project Steering Committee (PSC) and National Level Steering Committees meeting minutes; annual project Implementation Reviews (PIRs), final country reports and the draft final project report;
- d) Project Audit report(s), Annual Work Plans and Budgets or equivalent and revisions to project financing:
- e) Project documentation related to the strategy for project replication and communication;
- f) TE Mission: the visits provided the opportunity of having interviews with key stakeholders from the Ministries of Environment, Mining and Health from Argentina, Ecuador, Peru and Uruguay.

- 44. Annex 4 shows the full list of interviewees.
- 45. Findings from this evaluation can be applied to elaborating and implementing new projects. Lessons learnt on financial reporting, financial intermediate arrangements, savings and synergies achieved by joint implementation of similar projects, or improvement on report contents and conclusions obtained from the use of the UN Environment toolkit are all common situations that could be present in many other projects.

#### Limitations of the evaluation approach

- 46. Due to restrictions in budget, only Argentina and Uruguay were visited and for Ecuador only documentary review was undertaken. Uruguay was chosen since BCCC-SCRC is based in this country and the government of Uruguay was participating in this project. On the other hand, Argentina hosts the Basel Convention Regional Centre for South American Region for Training and Technology Transfer (BCRC), who was the national coordinator for this country, as well as a regional coordinator for another regional PCB project currently under a TE, thus both evaluations benefited from this visit. Finally, as Peru participated in this project and in the regional PCB project, this country was also chosen for a visit, whereas Ecuador participated in the Mercury Project only.
- 47. Eighteen (18) interviews were performed during the field mission, but these did not include meetings with private sector actors involved in mercury issues apart from Peru, where representatives of the mining sector industry were interviewed. Mostly government officials, consultants working on the project and specialized technical staff from some laboratories were interviewed in most of the countries. Therefore, there would be a bias in the analysis since views from private sector actors that had to provide their data for the elaboration of national inventories, and that will be affected by the new regulations, are missing.
- 48. Marginalized groups and women were not reached during the field mission, since most of them are located in remote areas difficult to access or communicating by internet or phone. However, all interviews tried to identify key issues affecting these vulnerable groups and the actions taken by the project in order to address their issues. However, to mitigate in part this limitation, during interviews and document revision, the evaluator set some "indicators" that would bring some proxy on how this project addressed gender and human rights issues: i) by assessing equity for women at project management level; ii) by assessing the number of outcomes that would impact- positive or negatively women and vulnerable groups, and iii) by assessing if management in BCCC-SCRC included explicit or implicit some of these issues in their planning or budget.
- 49. Another limitation found is derived from the information received on financial accountability, since formats used by UN Environment for reporting expenditures makes very difficult to make a deeper analysis on cost by project component in order to identify savings and re-allocations made during the project execution.

## III. The Project

#### A. Context

- 50. Previous studies made on Mercury emissions in Latin American and Caribbean (LAC) Region, indicated that 15% of global emissions to the atmosphere came from LAC countries, whereas 37% of global anthropogenic mercury emissions came from artisanal and small-scale gold mining (ASGM) activities. The latter activity is being widely practiced in LAC countries, but its magnitude has not been determined in detail. Uncertainties and availability of data for mercury sources remain as one of the major challenges that prevent elaboration of proper national policies and regulations to establish strategies for mercury reduction emissions, and sound management and control of current mercury stocks of products and commercial activities using this element.
- 51. During the time of project preparation, there were many differences in the number of regulations and baseline data for the different countries which were to participate in this regional project (Argentina, Uruguay, Ecuador, Peru and Nicaragua). For instance, Argentina, Peru and Uruguay had some regulations for controlling imports of mercury containing products and mercury as commodity, and they had also conducted some work on determining their national inventories, but Nicaragua did not have inventories nor regulations in place.
- 52. Activities using mercury are also different across countries and for Argentina and Uruguay ASGM activity is not an important issue; but for Ecuador and Peru it is since there are many illegal artisanal gold mines in both countries. Finally, Nicaragua does not have any regulations for controlling imports and exports of mercury products and it has not completed its inventory.
- 53. According to the project document (ProDoc), there also was some work in progress on interim storage and disposal of mercury wastes in Argentina, Peru and Uruguay.

#### B. Objectives and components

- 54. The objective of this project was to strengthen capacities of the five countries to identify mercury sources and priority actions to be taken for controlling emissions and preventing risks to human health and the environment from exposure to mercury releases.
- 55. The project intended to reach its objective through 4 components:
  - 1. Strengthening of the baseline and identification of information needs in participating countries;
  - 2. Development of mercury inventories in participating countries;
  - 3. Development of prioritized national mercury plans and enhancement of regional understanding of key mercury challenges;
  - 4. Lessons learned.
- 56. Main project's risks that were rated as "medium" are related to actors unwilling to provide data on mercury stocks and agree on risk management approaches and their implementation.
- 57. The project was designed to last three years (June 2014-June 2017), but some issues in implementation deferred the planned project completion to December 2018.
- 58. According the project logic, project Component 1 was focused on the assessment of information gaps, along with the identification of key stakeholders and compilation of relevant information related to mercury management, inventories and sectoral risk management approaches existing in each participant country.
- 59. Component 2 was to make use of the UN Environment's Toolkit for identification and quantification of mercury releases (hereafter referred as the 'Toolkit')³ level 1 and 2 for determining mercury releases, and it was to result in a better understanding of sources and allow participant countries to take priority actions in order to diminish mercury releases to protect human health and the environment, thus contributing to increase capacity for each country.
- 60. Component 3 was to include the development of national mercury risk management approaches as primary result. However, as it will be discussed further in Section IV.D (Effectiveness), these approaches were changed to national management plans, since the amount of resources available for this component was considered insufficient to meet this goal.
- 61. Component 4 was concerned with compiling and disseminating lessons learnt during project execution, thus the elaboration of a report on these lessons shared regionally to promote good practices for future projects was to be its main result.
- 62. It is worth noting, however, that the logical framework did not include a management component, thus many activities such as the elaboration of workplans, budgets, M&E plans (component 1), and number of project steering committee (PSC) meetings (component 4) should not be part of these project components. Management component is just considered in the project budget (Annex 1 from ProDoc).
- 63. The Table 1 shows a summary of main outputs, activities and project products according to the project description and the logical framework. A good correspondence can be found between both, except the comments on management activities described before.

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<sup>&</sup>lt;sup>3</sup> https://www.unenvironment.org/explore-topics/chemicals-waste/what-we-do/mercury/mercury-inventory-toolkit

Table 1: Summary of main project outputs and outcomes

Table 1: Summary of main project outputs and outcomes					
Description	Baseline value	Target 2014	Target 2015	Target 2016	Target 2017
Objective: To strengthen the capacity of participating LAC countries (Arg to identify mercury sources and the priority actions to be undertaken.	entina, Ecua	dor, Peru	ı, Nicarag	jua and U	Iruguay)
Outcome 1: Information needs identified in participating countries	;				
1.1 Workplan, budget and M&E plan endorsed by all participating countries	0	1	0	0	0
1.2 Existing materials and information on mercury identified and utilized	0	1	0	0	0
Outcome 2: Comprehensive information on mercury sources and releases enable a better understanding mercury risks to human health and the environment for participating countries					
# Inventories Level 1	2	5	0	5	0
# of Sectoral Inventories Level 2	0	0	15	0	0
Outcome 3: Enhanced understanding of national priority source through the development of national mercury risk management management gaps and needs					
3.1 Number of mercury priorities set in each participating country	0	0	0	0	15
3.2 Number of assessments on regulatory aspects and means for mercury emissions control	0	0	0	0	5
3.3 Number of data sets collected and analysed greatly contribute to the development of national risk management approaches	0	5	5	0	10
3.4 Number of prioritized national mercury risk management approaches for mercury reduction	0	0	0	5	0
Outcome 4: Lessons Learned available and shared regionally allo	w better pra	ctices in	future p	rojects	
4.1 Number of regional key sector identifying mercury management gaps	0	0	0	10	0
4.2 Final project report on lessons learned and main outputs (inventories, national mercury risk management approaches) endorsed and diffused	0	0	0	1	0
4.3 Number of Steering Committee Meeting reports available as part of the M&E plan	0	1	1	2	5

#### C. Stakeholders

- 64. Section A2 of the project document showed an indicative list of stakeholders identified in each country. However, no analysis was presented on their envisaged engagement in the project, since the list is rather an outline of actors' institutional interests and responsibilities. As illegal gold mining issues are absent from the project's situational analysis, the same applies to the stakeholders' analysis, and key actors like police force, affected communities and local authorities are not part of it. Other missing actors in the ProDoc are laboratory analysis who should take part of determination of Hg in several matrices.
- 65. The project document did not present an analysis on weakness and strengths for these actors, but key ones are Environment and Health Ministries (in charge of regulations and enforcement), and mining companies associations of participant countries. Other important actors are customs offices, technical research institutes, analytical labs and universities. Communities or populations affected by the project or by mercury related activities were not included in the project document, but it stated that these groups will be kept informed and it will promote participation. However, these groups were not identified during the execution of the project, since the risk management approaches (component 3.4) was changed by management plans.
- 66. Table 2: Stakeholders participating in the project, their roles and importance. presents the stakeholders who really participated in the project implementation and summarizes their roles in mercury issues. It is worth noting that Nicaragua withdraw from this project to implement one more suitable to its needs.

Table 2: Stakeholders participating in the project, their roles and importance.

Country	Stakeholder	Overall responsibilities in the country	Responsibility in this project	Importance
	Government's Secretariat for Environment and Sustainable Development	National authority on environmental and technical focal point in international negotiations on mercury	· ·	High
	Government's Secretariat for Industry (Ministry of Production and Labour)	· · · · · · · · · · · · · · · · · · ·	Participation in the PSC, collection of information on mercury uses in the industry sector	High
	Government's Secretariat for Mining (Ministry of Production and Labour)	National authority competent on the issue of the implementation of mining policy and which regulates the mining sector	Participation in the PSC, collection of information on mercury uses and emissions from the mining sector.	High
Argentina	Government's Secretariat for Energy (Ministry of Finance)	, ,	Participation in the PSC, collection of information on mercury uses and emissions from energy sector.	High
	Government's Secretariat for Health (Ministry of Health and Social Development)	Authority for implementing the national health care policies, including replacing mercury-containing devices in the medical sector.	Participation in the PSC, collection of information on mercury uses and emissions from hospitals and clinics.	High
	Agri-food's National Sanitary and Quality Service (Ministry of Production and Labour)	Elaborates and implement national policies on food safety and quality of vegetal and livestock food.	Participation in the PSC, collection of information on agri-food industry and processes.	Medium
	GIHON-Laboratorios Químicos SRL	Thimerosal producing company	Participation in the PSC, collection of information on thimerosal production	Medium

Country	Stakeholder	Overall responsibilities in the country	Responsibility in this project	Importance
	Customs' National Directorate	Implementation of customs codes and control of imports/exports of goods and wastes.	Provided data on imports and exports of mercury containing products.	Medium
	Basel Convention Regional Center (BCRC)	It is focused in sound management of hazardous waste in the region of South America, through training, information dissemination, awareness raising and technology transfer efforts by developing and strengthening regional countries' capacities	It is the national project executing agency and presided the Argentina's national steering committee. It is also member of the PSC.	High
	Ministry of Environment (MINAM)	international negotiations on mercury	Substances made the project supervision. It is also member of the PSC.	High
	Directorate-General of Environmental Health and Food Safety (DIGESA), it is an entity from the Ministry of Health.	It is the national authority responsible for elaboration of regulations, technical, surveillance of persons' external risks related with environmental health and food safety.	International Conventions. Its	Medium
	Superintendence National of Customs and Tax Administration (SUNAT).	Implementation of customs codes and control of imports/exports of goods and it has a register of all types of industries.	It is working on implementing customs codes for mercury containing products and participates in the Action Plan for Illegal Mining.	Medium
	Ministry of Energy and Mines (MINEM)	It elaborates and assess policies for the energy-mining sector in order to achieve sustainable development of these activities and diminish their environmental impacts.	The Ministry participated in the project through its "Technical Secretariat for Mining Formalization". It attended 2 workshops organized by the project and provided information for the elaboration of the mercury inventory related with mining activities. It also participates in the Technical Group of Chemical Substances.	High
	Ministry of Environment (MAE)	National environmental authority which establishes the environment regulations related to mercury releases to the air, water and soil. Technical focal point in mercury international negotiations	Project national coordinating agency responsible for coordination with several stakeholders.	High
	EKO Consultants EKS S.A.	Private consulting company specialized on environmental issues.	This company was appointed as the project national executing entity.	High
Ecuador	Ministry of Mining	It regulates and controls small size and large mines. Currently, this Ministry became the Vice Ministry of Mining of the Ministry of Energy and Natural Non-renewable Resources.		High
	Geological- Miner - Metallurgical National Research Institute (INIGEMM)	Generates, systematizes and manages geological, miner and metallurgical scientific and technical information.		Medium

Country	Stakeholder	Overall responsibilities in the country	Responsibility in this project	Importance
	National Customs Service of Ecuador (SENAE)	Facilitates and controls international commerce with Ecuador.	It controls imports of mercury containing products and can open national tariff codes for these products.	Medium
	Ministry of Health	Authority responsible for implementing the national health care policies, including replacing mercury-containing devices in the medical sector	It can elaborate remediation actions for contaminated sites.	High
	National Directorate for the Environment (DINAMA)	Support the definition of environmental aspects of products at the end of its useful life and aspects of the analytical capacity to measure mercury in environmental matrices. It also has analytical capacity for determining mercury in different environmental matrices.	DINAMA's lab participated in training to enhance analytical capacity of DINAMA and the	High
	Ministry of Public Health (MSP)	Management of potential contaminated sites.		High
	Basel Convention Coordinating Centre, Stockholm Convention Regional Centre, for Latin America and the Caribbean Region (BCCC- SCRC) hosted by Uruguay	Regional coordination entity for Basel Convention issues.	Project executing agency responsible for coordination of 5 participant countries. It chaired the PSC.	High
Uruguay	National Customs Bureau	It Supports measures related to mercury imports and its monitoring and it also elaborated new tariff codes for importing mercury products.	It provided data on imports of mercury containing products and helped to improve the national inventory.	Medium
	Department of Toxicology from Faculty of Medicine, University of the Republic	Analytical capacity to measure mercury in environmental and biological matrices.		Medium
		LATU is a non-state public law organization aimed to provide services to the production chain. It is a national and international reference in innovation, technology transfer and value solutions in analytical services, conformity assessment, metrology and technological services.	It elaborates national technical standards on mercury containing products.	Medium
	The World Alliance for Mercury-Free Dentistry	It works with RAPAL Uruguay to eliminate mercury form dentistry.	Dissemination of information across Uruguay and Latin-America	Medium

# D. Project implementation structure and partners

67. The project was organized as shown in Figure 1. UN Environment was the GEF Implementing Agency, where its main responsibilities were the overall coordination and supervision of the project and provision of technical, financial and management advise. UN Environment submitted timely reports on project progress to the GEF Secretariat.

- 68. The Project Steering Committee (PSC) was conformed and met three times between 2016-2018. Members of this PSC were the same institutions that implemented the project at national level.
- 69. BCCC-SCRC was the Executing Agency and it coordinated all project activities implemented by the participant countries, and it also provided technical assistance and guidance to the countries. It also managed the project funds and submitted quarterly reports on project progress and financing to the Implementing Agency.
- 70. Most of the participating countries implemented the activities through their respective Ministries of Environment, except for Argentina, where the BCRC was the National Executing Agency. In Ecuador, the Ministry of Environment (MAE) appointed a local consulting company to execute the project.
- 71. All countries set up national coordination groups/committees to keep the main stakeholders informed and participating in the different project activities.

GEF Implementing Agency **UN Environment Project Steering Committee** UN Environment, BCCC-SCRC, National executing partners Project Executing Agency Basel Convention Coordinating Centre-Stockholm Convention Regional Centre for Latin America and the Caribbean Region (BCCC-SCRC) National Executing Partners **Argentina** Uruguay Ecuador Peru Basel Center for Regional National Directorate for the Ministry of Environment Ministry of Environment Cooperation (BCRC) Environment (DINAMA) National National National National **Coordination Group** Coordination Group **Coordination Group Coordination Group** 

Figure 1: Project organization and main partners.

#### E. Changes in design during implementation

- 72. As this project was very similar to the MIA project implemented by UN Environment ("Development of Minamata Initial Assessment in LAC4"), it was decided to implement joint activities such as workshops and exchange of experiences between these two projects. This decision was meant to reduce projects' costs, make better use of resources available in both projects, and it also responded to the desire of participant countries to share their experiences from the implementation of these individual projects, to discuss the implications of the Minamata Convention provisions and the ways to address different regional issues.
- 73. The original project document intended to elaborate "national risk management approaches" as one of the key components of the project (3.4: "Number of prioritized national mercury risk management approaches for mercury reduction"). Since these approaches required more resources than those available for the project, it was decided to align this component to "national action plans" as defined in the MIA project.
- 74. BCCC-SCRC adjusted project activities according to the needs of each country, which resulted in important changes in Component 3: "Development/ Identification of national mercury risk management approaches and improved regional understanding of key mercury challenges". As development of risk management approaches needed more resources than the project was able to provide, the participating countries considered that sub-components 3.3 (Number of data sets collected and analysed greatly contribute to the development of national risk management approaches) and 3.4 ("Number of prioritized national mercury risk management approaches for mercury reduction") should be re-defined into something more similar to the MIA project's elaboration of actions plans and strengthening of countries' analytical capacities. These changes also allowed to have a more intense exchange with

<sup>&</sup>lt;sup>4</sup> Participant countries in this project are Bolivia, Chile, Dominican Republic and Paraguay.

countries that were executing the activities of the regional MIA project, since both projects were oriented to complete similar activities and achieve similar outcomes.

- 75. For sub-component 3.3 changes are related with the strengthening of analytical capabilities for each country (interlaboratory exercise, training on technics to determine mercury contents in air, human hair, water, soils, fish, etc.), whereas sub-component 3.4 was oriented to the preparation of national action plans and included training and webinars on waste management, identification of contaminated sites and monitoring campaigns to determine mercury contents using the technique of passive tubes (sample analysis would be made in Italy).
- 76. In March 2016, the Government of Nicaragua decided to withdraw from the project due to the lack of funds to meet its co-financing commitments and opted to develop an independent and more ambitious project to be submitted to the GEF during the first semester of 2018.
- 77. The project was expected to last 36 months (June 2014 May 2017), but due to delays from participant countries' bureaucratic issues, the finalization date was deferred to December 2018, with no cost to GEF. In October 2016, the PSC also decided to make changes in the workplan and project budget.

#### F. Project financing

- 78. The project was extended for approximately two years to allow achievement of its outcomes and objectives.
- 79. The regional project was designed to last 36 months (June 2014-June 2017) with a total budget- after deduction of Nicaragua's contribution- of US\$ 3,510,434 from which GEF resources in cash were US\$ 916,000. In-kind contributions from participant countries and UN Environment were to amount to US\$ 2,594,434 and in-cash contributions were to amount to U\$ 143,400. Detailed project budget and co-finance are shown in Table 3. Unfortunately, as UN Environment formats for reporting project expenditures are designed in terms of budget lines, it was not possible to analyse this data according GEF requirements (by outcome), thus the consultant approached this issue by analysing project annual disbursements versus planned at design, as it is shown in *Table 4*.
- 80. Components to which more resources were allocated are the national inventories (component 2) and development of risk management approaches (component 3), accounting 29% and 35% of GEF resources respectively. Regarding co-financing commitments, components 2 and 3 amounted to 75% of co-financing from national governments. The inventory component amounted US\$ 1.66 million and the development of risk management approaches reached US\$ 734,000, this is 35% of and 29% the total co-financing respectively, both totalling 75% of all co-financing.
- 81. In October 2016, the participant countries made a self-evaluation exercise, where important items from project budgets were re-allocated to satisfy new demands from participant countries5.
- 82. The data collected during the evaluation showed that disbursements were well below from what was planned in the project document. In 2014 expenditures were null, in 2015 and 2016 only 49% and 41% of the annual budgets were executed. The bureaucracy (no institutions available to manage funds in Peru and Ecuador) and change of national authorities in some of the participating countries were identified as the main reasons for these delays, thus the project was extended for almost 2 years in order to achieve the results stipulated in the project document. While MOUs were signed in 2015 for Argentina, Peru and Uruguay, whereas Ecuador signed in November 2016.
- 83. By September 2018, the project spent approximately US\$ 817,000 (89%) of GEF resources, leaving an unspent balance of US\$ 98,600 (11%).
- 84. Regarding co-financing as Nicaragua left the project in 2016, its co-financing commitments do not appear in this table. The results show that only 38% of the committed resources haven been made available to the project. At this moment, UN Environment and Uruguay need to submit their in-kind contributions to complete the co-finance table.

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<sup>&</sup>lt;sup>5</sup> US\$ 230,000 were re-allocated: i) US\$ 81,000 from consultancies; ii) US\$ 90,000 from analytical; iii) US\$ 16,000 from inventories and US\$ 43,000 from Nicaragua's budget.

Table 3: Project co-financing according GEF format

Co- financing	UN Environment own Financing (US\$1,000)		Governments (US\$1,000)		Other (US\$1,000)		Total (US	\$ 1,000)	Total Disbursed (US\$
	Planned	Actual	Planned	Actual	Planned	Actual	Planned	Actual	1,000)
Grants (in cash)			143,40	3,29					3,29
In-kind support	914,13		1.536,90	983,18					983,18
Other (*)									-
Totals	914,13	-	1.680,30	986,47	-	-	•	-	986,47

Table 4: Planned rate for expenditures versus actual.

	2014 (*)	2015	2016	2017	2018 (**)	Total	Unspen
year/expenditures (US\$)	1	2	3	4	5	(US\$)	balance (US\$)
Planned	438.667	296.667	180.667			916.001	
Actual	-	144.824	74.526	474.272	123.684	817.306	98.695
Rate (actual/planned)	0%	49%	41%				
Cumulative rate (expenditures/GEF budget)	0%	16%	24%	76%	89%	89%	11%

<sup>(\*):</sup> Expenditures from June 2014

# IV. Theory of Change at Evaluation

# Reconstructed Theory of Change at Evaluation

- 85. As mentioned in Section III.E, there is a difference in concepts between the project's name suggesting the development of "risk management approaches" and the main project objective "to strengthen national capacities" for establishing national inventories, determine Hg contents in humans and some environmental matrices, and development of Hg management plans. In any case, for the present analysis "risk management approaches" means the systematization of information about Hg sources and impacts, identification of priority sectors, and the elaboration of new regulations and management plans to control Hg emissions, management of stocks and disposal of wastes, with the ultimate objective of protecting human health and environment from Hg releases.
- 86. It is important to note that this project does not imply that participating countries will take actions to regulate/enforce Hg activities, since it was designed as a "strengthening project", thus commitments are limited to the elaboration of national risk management approaches.
- 87. The project logic assumes that participant countries will strengthen their Hg management capabilities through a detailed gap analysis on information and regulations needed to setup proper Hg management systems in each country. Once gaps and information needs have been assessed, countries would be able to identify Hg sources and identify priority actions to reduce Hg emissions and get better understanding of mercury

<sup>(\*\*):</sup> Expenditures until sept 30, 2018: there is a difference of US\$ 25,216 respect to reports from the center.

risks to human health and environment through the elaboration of national mercury risk management approaches and plans.

- 88. With this new knowledge and understanding, participant countries would require implementation of technical standards to involve economic activities and the private sector. The countries would enforce regulations and public policies to diminish risks from Hg exposure.
- 89. Each participant country would share their lessons learnt with others in similar conditions to promote new regulations and standards that would lead to dissemination of sound mercury management systems around the globe.
- Some important assumptions (external conditions that are beyond the power of influence of the project) and drivers (external conditions the project can influence to some extent) are underlying this logic. The key driver for the transition from the identification of needs and availability of information to the capability of countries to identify mercury sources is that stakeholders are conscious of the problem and are committed to share information on some key production processes and current mercury management practices. In order for the project to move from identification of mercury sources to countries having enhanced capacity to manage mercury, the important driver is that the UN Environment Toolkit needs to be properly understood and applied and a critical assumption is that stakeholders cooperate in collecting data and applying the toolkit. In order for the countries to take action to revise/develop technical standards, policies and regulations on Hg management, the important driver of 'training is provided to public officials and companies involved on elaboration of management plans' is in place, and that the important assumption 'participant countries collaborate and coordinate action' holds. There are two critical assumptions that need to hold, for the project to lead towards impact; these are that governments prioritize mercury issues, and that stakeholders are willing to adopt new technologies and practices.

Table 5 and Figure 2 show a representation for ToC for the project logic according to what the evaluator concluded from the document review and project intended outcomes. This ToC includes intermediate states that are necessary to achieve the impact stated in the ProDoc.

Table 5: Reconstructed ToC at evaluation. Outputs/outcomes and intermediate states are numbered according discussion followed in Section D for ease of reference.

ToC at design		Reconstructed ToC					
<u>Objective:</u> To strengthen the capacity of participating LAC countries (Argentina, Ecuador, Peru, Nicaragua and Uruguay) to identify mercury sources and the priority actions to be undertaken.		<u>Objective:</u> To strengthen the capacity of participating LAC countries (Argentina, Ecuador, Peru, Nicaragua and Uruguay) to identify mercury sources and the priority actions to be undertaken.					
Output	Outcome Interme		Output	Outcome	Intermediate State	Impact	
UNEP Toolkit for Identification and Quantification of Mercury Releases, Level 1 and Level 2 disseminated for project use.	1: Information needs identified in participating countries		D.1.1: Information needs identified in participating countries	D.2.1: Participating LAC countries are able to identify mercury sources	1.: Countries take actions to revise/develop technical standards on Hg management		
Level 1 and Level 2 mercury inventories for each participating country, identifying key sectors	2: Comprehensive information on mercury sources and releases enable a better understanding of mercury risks to human health and the environment for participating countries		D.1.2: Comprehensive information on mercury sources and releases available.	D.2.2: Participating LAC countries are able to identify priority actions to reduce mercury releases.  D.2.3: Better understanding of mercury risks to human health for participating countries  D.2.4: Better understanding of mercury risks to the environment for participating countries	2.: Countries take actions to revise/developed regulations and public policies	Risks to human health and the environment from mercury releases reduced	
3.1 Number of mercury priorities set in each participating country.	3: Enhanced understanding of national priority sources and capacity for		D.1.3: Development of national mercury risk management approaches	<u>D.2.5:</u> Understanding of national priority sources enhanced			

ToC at design			Reconstructed ToC				
<u>Objective:</u> To strengthen the capacity of participating LAC countries (Argentina, Ecuador, Peru, Nicaragua and Uruguay) to identify mercury sources and the priority actions to be undertaken.			<u>Objective:</u> To strengthen the capacity of participating LAC countries (Argentina, Ecuador, Peru, Nicaragua and Uruguay) to identify mercury sources and the priority actions to be undertaken.				
Output	Outcome	Intermediate State	Output	Outcome	Intermediate State	Impact	
3.2 Number of assessments on regulatory aspects and means for mercury emissions control 3.3 Number of data sets collected and analysed greatly contribute to the development of national risk management approaches. 3.4 Number of prioritized national mercury risk management approaches for mercury reduction	mercury management through the development of national mercury risk management approaches including the identification of management gaps and needs		<u>D.1.4</u> Mercury management gaps and needs identified	<u>D.2.6:</u> capacity for mercury management enhanced	4.: Countries apply technical standards to diminish risks from Hg exposure  3.: Countries enforce regulations and public policies to diminish risks from Hg exposure		
4.1 Number of regional key sector identifying mercury management gaps	4: Lessons Learned available and shared regionally allow better practices in future projects		D.1.5 Lessons Learned available and shared regionally	<u>D.2.7:</u> better practices implemented in future projects	5.: Countries not participating in the project take actions to revise/develop technical standards on Hg management		

ToC at design			Reconstructed ToC				
<u>Objective:</u> To strengthen the capacity of participating LAC countries (Argentina, Ecuador, Peru, Nicaragua and Uruguay) to identify mercury sources and the priority actions to be undertaken.			<u>Objective:</u> To strengthen the capacity of participating LAC countries (Argentina, Ecuador, Peru, Nicaragua and Uruguay) to identify mercury sources and the priority actions to be undertaken.				
Output	Outcome	Intermediate State	Output	Outcome	Intermediate State	Impact	
4.2 Final project report on lessons learned and main outputs (inventories, national mercury risk management approaches) endorsed and diffused			<u>D.1.6:</u> Regional understanding of Hg challenges enhanced (from ProDoc)		6.: Countries not participating in the project take actions to revise/develop regulations and public policies		

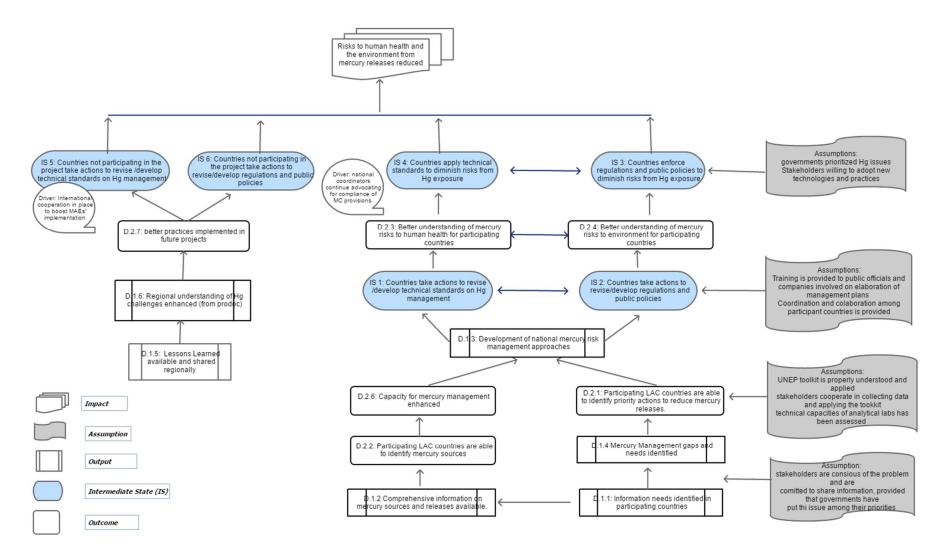


Figure 2: Reconstructed ToC. Outputs/outcome numbers according discussion in Section D.

#### **Evaluation Findings** V.

#### A. Strategic Relevance

- The environmental issues targeted by this project are in line with GEF-5 for POPs' Strategic Objective Chem-3: "Pilot sound chemicals management and mercury reduction", and its expected outcome 3.1: "Country capacity built to effectively manage mercury in priority sectors".
- 92. Regarding UN Environment Medium-Term Strategy (MTS) 2014-2017, the project fits into Strategic Direction ("Sub-programme") 5: "Harmful substances and hazardous waste" (to minimize the impact of harmful substances and hazardous waste on the environment and human beings) and its Expected Accomplishments (EA): 1)"Enabling environment: Countries increasingly have the necessary institutional capacity and policy instruments to manage chemicals and waste soundly including the implementation of related provisions of the multilateral environmental agreements"; 2) "Chemicals: Countries, including major groups and stakeholders, make increasing use of the scientific and technical knowledge and tools needed to implement sound chemicals management and the related Multilateral Environmental Agreements"<sup>6</sup>. The Sub-programme 5 indicator of achievement to which this project contributes to is indicator (i): "Increase in number of countries reporting the adoption of policies for the sound management of chemicals and waste, with the assistance of UNEP".
- This project is complementary with a MIA project implemented by UN Environment ("Development of Minamata Initial Assessment in LAC").

#### Relevance to the regional and global priorities

This project contributed to the LAC countries' regional efforts to the development of a sound legal and technical framework to comply with the Minamata Convention's main commitments by providing continuity to previous projects implemented in this region.

#### The relevance of the project objective to the participating countries

- Regarding project relevance to participating countries, it is worth noting that all countries participating in this project have elaborated their national mercury inventories with a varied degree of details and regulations to introduce controls on mercury imports, uses, storage and disposal. As part of their efforts to protect human health and environment from the dangerous mercury emissions, UN Environment has implemented the GEF project to assist Argentina and Uruguay to develop sustainable healthcare waste management practices and protecting public health and global environment from the impacts of dioxin and mercury releases in Argentina and Uruguay<sup>7</sup>. At the same time Ecuador and Peru have documented the risks for human health and environment as result of the use of mercury in the small artisanal gold mining sector and developed strategies to strength health services in the mining areas and mercury handling in medical centers8.
- Despite of the efforts mentioned above, mercury is still in use in the health and smallscale gold mining sectors, and development/upgrade of technical standards and regulations to ensure the sound management and disposal of mercury waste is needed. Gaps in information regarding this were also noted during the project elaboration stage. In addition, participant countries must comply with the relevant provisions of the Minamata Convention on Mercury (MC), thus they must either develop or update their mercury inventories and

<sup>&</sup>lt;sup>6</sup> "Medium term strategy 2014-2017"; UN Environment 2015, page 21.

<sup>&</sup>lt;sup>7</sup> Global Healthcare Waste Project (2008-2013).

<sup>&</sup>lt;sup>8</sup> The Ministry of Health of Peru participated in the first UN Environment Mercury Storage Project for the Latin American and Caribbean Region, and in the Regional Project with Bolivia to develop a National Strategy to Reduce the Use of Mercury in Artisanal and Small-Scale Gold Mining.

elaborate specific regulations and mercury sound management systems to comply with Minamata deadlines for phasing-out mercury containing products and wastes.

97. Therefore, this project is relevant to all participant countries to assist them to identify mercury sources and strengthen their capability to analyse samples from different matrices and elaborate proper national regulations needed to comply their international commitments and protect the human health and the environment by preventing hazardous mercury releases.

#### The relevance of the project implementation approach to the participating countries

98. The project approach considered extensive collaboration and sharing of experiences among all participant countries. Benefits from this collaborative work and exchange provided activities shaped to the countries' needs and realities, and project relevance and possibly sustainability were increased through this strategy.

#### Factors affecting this criterion

- 99. During this review process, it was noted that implementers from the participant countries were committed to achieve the desired products and results, thus this engagement was very positive to achieve the participation of each country internal actors, both from government institutions and private sector stakeholders involved in this matter. Several institutions involved in these countries- such as Ministries of Health, Environment, Mining and Customs Offices, and companies from chlor-alkali industry, drinking water and mines; cooperated to collect the required information needed to elaborate the Mercury inventories with the quality and accuracy required for this kind of activity.
- 100. The regional coordination agency also provided assistance and inputs for each country when required and facilitated the financial management to these countries and assisted with the hiring of national and international experts to implement each of the project products and established a participative approach where involved countries could redefine some project activities to fit them to each country's reality and capacities.

#### Rating for strategic relevance: Highly Satisfactory

### B. Quality of Project Design

#### **External Context**

101. The project document does not assess the occurrence of conflicts. This is a sensitive situation in where illegal artisanal gold mining is depredating vast areas of rain forest in Madre de Dios and is a very violent area in the country. Likelihood of natural disasters are not mentioned, where earthquakes are very common in Chile, Ecuador and changes in governments were not considered during the project preparation.

#### Project preparation

- 102. There is a comprehensive analysis on institutional and regulatory frameworks for all participant countries, and at the same time the project document presents relevant prior experiences about mercury issues implemented in every country, but there is no mention about political and other shortcomings related to illegal gold mining activities and risks underlying with these issues.
- 103. Regarding stakeholder analysis, most of relevant actors from public and private sectors are identified. However, inclusion of NGOs or other CSO was not considered (except for Argentina), and gender, indigenous people issues are not assessed neither. However, the project document recognized that mercury issues affect children, women and indigenous

peoples and stated that it will find the way to work with communities and other vulnerable groups.

#### Strategic Relevance

- 104. The project is well aligned with UNEP's priorities expressed in its PoW and MTS. GEF objectives and regional and national priorities were also identified during project preparation in order to obtain the desired results and ownership in each participant country. Therefore, the project constituted a serious and advanced effort to address the main mercury issues present in every country, when Minamata Convention was still under discussion.
- 105. Complementary actions carried out in the LAC by UN Environment and other implementing agencies were assessed in order to avoid duplication of efforts in the participant countries. This project was complementary to another UN Environment regional project titled "Development of Minamata Initial Assessment (MIA) in LAC", whose main objective is the "Ratification and early implementation of the Minamata Convention". Main outputs from MIA project are the assessment of institutional capacities, confirm commitment of national stakeholders, establish coordination mechanisms, assess mercury sources and inventory using UNEP's toolkit, development of strategies to assess and manage contaminated sites, and develop priority actions for each country<sup>10</sup>.

#### Intended Results ad Causality

- 106. One of the main project objectives was to develop national and sectorial inventories using the "UNEP toolkit for Identification and Quantification of Mercury Releases". This toolkit provides both simplified and detailed mercury release assessments, called inventories Level 1 and Level 2 respectively. After determining individual country's releases, a risk management system for priority sectors will be developed during project implementation.
- 107. All countries were to elaborate Level 1 inventories (except for Uruguay) and at least 2 to 3 Level 2 inventories for key priority sectors in each country.
- 108. Once emissions sources are identified, the project would make mercury analysis in various matrices (mainly air and human hair) to determine mercury impacts on environment and human health.
- 109. Finally, each participant country would develop risk analysis and elaborate mercury sound management systems and regulations, and lessons learnt would be distilled and spread via workshops among LAC countries.
- 110. The strength of this project is that it provides room for discussion of common issues affecting environment and human health amongst participant countries. Joint learning on how to address political, institutional and regulatory aspects were thought to be discussed and relevant experiences shared in a group, in order for the countries to gain a common understanding on key mercury issues and the measures for their resolution.
- 111. The project document presents confusing language for the statement of the project name itself: "Development of mercury risk management approaches in Latin America", which immediately suggests concepts such as "risk assessment" and "risk management". In this regard, there is an UN Environment publication on assessing populations at risk from

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<sup>&</sup>lt;sup>9</sup> See report of the inception workshop "Taller Regional de Lanzamiento de proyectos sobre Mercurio", Montevideo, Uruguay, Nov 18-20, 2014, BCCC-SCRC. In the inception workshop the name of the project was changed to "Desarrollo de inventarios y planes de manejo de mercurio en América Latina y la región del Caribe (Development of inventories and mercury management plans in LAC Region)".

<sup>&</sup>lt;sup>10</sup> See Project Document "Development of Minamata Initial Assessment in LAC", Id 5879; page 14

mercury releases<sup>11</sup>, where focus is on clinical and biomonitoring of mercury in selected populations and different matrices to assess exposure to the element. Then risk management options are characterized (maximum levels of Hg in fish, changes in consumption patterns, regulations, etc.).

- 112. Therefore, the concept of "risk management" is more associated to epidemiologic studies on populations exposed to mercury emissions, rather than identification of mercury sources, assessment of regulatory options to comply with Minamata provisions, and development and implementation of management plans, as was the intention of this project. A project design weakness is that the term for "risk management approach" is not defined and remains ambiguous, since concepts "risk assessment" and "risk management" would also be applied as discussed above.
- 113. On the other hand, the main project objective is "to strengthen capacity" of participant countries, but no assessment is made on analytical capacity for these countries, which is a significant issue for some of the countries. Analytical capacity is critical, since levels of mercury in several matrices should be made in order to identify health risks and environmental impacts.
- 114. For outcome 1: "Information needs identified", the associated indicator "workplans, budgets, M&E plan endorsed" does not seem appropriate, since these are more related with products and project management activities.
- 115. With regards to "lessons learnt", this component does not have replication activities, nor strategy to ensure that the experiences of participant countries would be spread to other LAC countries or disseminated worldwide.
- 116. Finally, the project document does not include an exit strategy to promote the sustainability of its results.
- 117. Considering the elements described and other issues risen during the document review and exchanges with BCCC-SCRC staff, the evaluation rating for the project design according to UN Environment guidelines is shown in Table 6 below. A detailed version with comments and individual scores for each evaluation criterium was presented in inception report of this evaluation.

Table 6: Project design ratings according to a review of the project document

	SECTION	<b>RATING</b> (1-6)	WEIGHTING	<b>TOTAL</b> (Rating x Weighting)
Α	Nature of the External Context	3,0	0,4	1,2
В	Project Preparation	3,6	1,2	4,3
С	Strategic Relevance	3,6	8,0	2,9
D	Intended Results and Causality	3,6	1,6	5,8
E	Logical Framework and Monitoring	3,9	0,8	3,1
F	Governance and Supervision Arrangements	4,5	0,4	1,8
G	Partnerships	3,0	0,8	2,4
Н	Learning, Communication and Outreach	3,3	0,4	1,3
- 1	Financial Planning / Budgeting	4,5	0,4	1,8
J	Efficiency	4,3	0,8	3,4
K	Risk identification and Social Safeguards	2,3	0,8	1,9
L	Sustainability / Replication and Catalytic Effects	2,3	1,2	2,7

<sup>&</sup>lt;sup>11</sup> "Guidance for Identifying Populations at Risk from Mercury Exposure"; UN Environment DTIE Chemicals Branch and WHO Department of Food Safety, Zoonoses and Foodborne Diseases; Geneva, 2008.

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M	Identified Project Design Weaknesses/Gaps	4,5	0,4	1,8
			TOTAL	
			SCORE (*)	3,43

(\*) Sum of totals divided by 10.

1 (Highly Unsatisfactory)	< 1.83	4 (Moderately Satisfactory)	>=3.5 <=4.33
2 (Unsatisfactory)	>= 1.83 < 2.66	5 (Satisfactory)	>4.33 <= 5.16
3 (Moderately Unsatisfactory)	>=2.66 <3.5	6 (Highly Satisfactory)	> 5.16

## Rating for quality of project design: Moderately Satisfactory

#### C. Nature of the External Context

118. No severe political issues took place in the five participant countries. There were changes in national authorities (presidential elections in Uruguay (2014), ministry of environment changed twice in Ecuador (2013) and Argentina (2015). Risks for political instability or natural disasters were absent during project implementation.

#### Rating for nature of the external context: Favourable

#### D. Effectiveness

#### D.1 Delivery of outputs

- 119. The project started in June 9, 2014 and it was planned to finish in June 9, 2017 (36 months). The project document stated milestones for delivering key project deliverables as shown in *Table*  $7^{12}$ .
- 120. Despite that, signature of MOU was identified as the main cause of delays during the implementation of the project. It was noted that limited availability of data from public institutions and private sector companies involved was also an important issue. In Argentina it is difficult to get data from Customs Office since there is a law that protects confidentiality to owners of this information. Data from sanitary, waste and mining sector companies was also difficult to obtain, since some considered this information as sensitive regarding their activity.
- 121. The Terminal Evaluation found that most of activities were finalized in 2018 and that the final report was being prepared by BCCC-SCRC in December 2018, thus project activities were not yet closed by that time, and a delay in the implementation of approximately two years was noted. As signing of agreements of BCCC-SCRC with the respective countries had significant issues (Ecuador signed in November 2016), the overall project experienced a significant delay in its activities, thus the overall rating for this subsection is "moderately unsatisfactory" because timeliness for delivery of main project outputs could not be achieved in the desired timeframe.
- 122. For example, elaboration of national inventories finished in October 2017 (planned October 2015), whereas identification of mercury management gaps and assessment of regulatory aspects was done in June 2018 (planned December 2015). All these activities are related with project Components 2 and 3 which together amounted for almost two-third of GEF resources.

Table 7: Initial milestones for key project products and their proximate actual delivery.

Key deliverables	Timeline (months after project start)	Date	actual	comments
Agreement between UNEP and the Uruguay Centre	1	9-7-2014	26-05-2014	
Establishment of Project management     Unit at the Uruguay Centre	1-2	9-8-2014	26-05-2014	
Contact with National Focal Points.     Establishment of National Coordination     Committees (NCC) in project countries.	3	9-9-2014	09-09-2014	
Agreements between BCCC-SRC and Argentina, Ecuador, Peru and Uruguay	not defined in ProDoc	not defined in ProDoc	Argentina, Peru, Uruguay: June 2015;	assessed as key issue in project delays.

<sup>&</sup>lt;sup>12</sup> See Appendix 8, page 38 Project Document.

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	Timeline		-	
Key deliverables	(months after project start)	Date	actual	comments
			Ecuador: Nov. 2016	
4. Inception meeting - convened by the Uruguay Centre.	3-4	9-10-2014	18-11-2014	
5. Finalization and endorsement of the project workplan, budget and M&E plan	3-4	9-10-2014	09-10-2014	
6. National technical assistants recruited	6	9-12-2014		
7. Existing materials and information on mercury identified and utilized	6	9-12-2014	30-06-2017	80% achieved, gaps presented as inventories are being elaborated
8. Number of key industrial sectors identified through regional consultation	6-8	9-2-2014	30-06-2017	inventories
Mercury inventories developed for each participating country	6-16	9-10-2015	19-09-2017	Ecuador was the last one.
Number of regional laboratories able to perform mercury analysis defined	8-16	9-10-2015	22-11-2017	Training in Slovenia
11. Mercury management gaps identified in key sectors	14-18	9-12-2015	30-06-2018	only 3 out of 10 identified. Just disposal sites are mentioned as problem
12. Assessment of regulatory aspects and means for mercury emissions control	14-18	9-12-2015	30-06-2018	
13. Assessment of needs for mercury monitoring in humans and the environment at priority sites	14-16	9-10-2015	30-06-2018	screening of previous studies made, but no conclusions on needs reported.
14. Prioritized national risk management approaches for mercury reduction developed in all participating countries	20-28	9-10-2016	18-01-2018	It was changed to the elaboration of national action plans and monitoring of Hg in Peru. Ecuador is the only country with a risk management plan
15. Compilation of regional lessons learned report based on national inventories and risk management approaches	28-32	9-02-2017	30-6-217	All countries submitted their lessons learned reports, but compilation still pending.
16. Workshop for participating countries on lessons learned and regional priority setting	28-30	9-12-2016	22-11-2017	November 2017 in Montevideo, Uruguay.
17. Dissemination of lessons learned	36	9-6-2017		No report available yet. Ecuador issued its lessons learnt report on March 2018.
Final project report	not defined in ProDoc	not defined in ProDoc	30-11-2018	in process

#### D.1.1 Information needs identified in participating countries

240. The project successfully identified the information needs for every participating country. This was achieved through several activities such as the implementation of a regional workshop (October 2014) where attendants identified information gaps and needs for regulations and infrastructure to implement sound mercury management systems. Approximately ten countries participated of this workshop.

- 241. The project participant countries also implemented national workshops with local stakeholders that contributed to defining the main issues that were preventing the implementation of sound regulations and mercury management. Thanks to these workshops, national project coordinators could elaborate proper terms of reference to hire national consultants that elaborated studies on the status of current regulations and technical standards and propose amendments in line with MC provisions.
- 242. Peru and Ecuador also assessed the situation of use of mercury and the contamination resulting in locations where small gold mining activities take place. A screening of all relevant scientific studies on sites contaminated with mercury and their level in humans and environment was carried-out.
- 243. All countries updated their national inventories with the assistance of a senior regional consultant and UN Environment experts who provide training on the use of the UN Environment Toolkit to elaborate these inventories. The use of the toolkit was a key decision since it as the first time that all countries used it as standard methodology.

Status: achieved

makers at every country

#### D.1.2 Comprehensive information on mercury sources and releases available

- 244. The use of the UN Environment toolkit provided information on mercury sources and releases with a varied level of details according to the information available at every country. All countries developed Level<sup>13</sup> 1 and Level 2<sup>14</sup> inventories.
- 245. Argentina elaborated its Level 1 and Level 2 inventories. The Level 2 inventory was focused in four key sectors (gold extraction, chlor-alkali production, elaboration of pharmaceutical products (thimerosal) and liquid effluent waste treatment), from which gold extraction and wastewater treatment are the main sources for mercury releases.
- 246. Ecuador considered 10 mercury sources in the elaboration of its Level 1 inventory (extraction and use of fuels, primary virgin metal production, production of mineral and other materials with mercury traces, mercury use in industrial processes and products, production of recycled metals, waste incineration and disposal and cemeteries). Further analysis at a Level 2 inventory for some key sectors identified gold extraction as one of the main emission sources, along with the use of products with mercury content.
- 247. Peru developed Level 1 and Level 2 inventories using 2014 as base year. Level 2 showed that gold extraction with/without mercury amalgam was one of the most important sources of mercury releases.
- 248. Uruguay elaborated an inventory Level 2 and determined that the main source of mercury releases was the chlor-alkali facility, followed by the extraction and use of fuels/energy.

Level 1 inventories use pre-defined emission factors used worldwide.
 Emission factors are estimated at national level thus it provides more accurate information to decision.

Status: achieved

#### D.1.3 Development of national mercury risk management approaches

- 249. The way the Center considered country needs was a key feature developed during project implementation. In fact, as each country defined their own needs, BCCC-SRC identified individual and common needs, and searched for the appropriate expert knowledge available at local and global scale. This resulted in interventions towards relevant targets previously defined by the participant countries and steered by the project.
- 250. As an example of the above, the Center organized specific activities and workshops to respond to the different countries needs to strength their capacities for the elaboration of national action plans and risks management approaches: i) an international expert was appointed to train the personnel that was using the toolkit for elaboration of inventories; ii) there was a specific training conducted at the Department of Environmental Sciences, Jozef Stefan Institute, in the City of Ljubljana, Slovenia for enhancing capacities in analysis of mercury in different matrices (soil, air and water); iii) there was a regional workshop for discussing different approaches to implement sound mercury management systems; iv) as an additional not planned activity, 3 international experts were appointed by the project to provide technical assistance during the mercury pollution emergency in Madre de Dios, Peru.
- 251. Under this component, several training and exchange activities were carried out to update analytical techniques to determine mercury in humans, soil, water and air in order to perform monitoring of this element and provide reliable data on pollution in several matrices.
- 252. Examples for strengthening activities are the organization of a Sub-regional Workshop on Enhancing Parties Capacities for Environmentally Sound Management of Mercury Wastes (2015), a risk communication training in Ecuador and Peru (2017), training on contaminated sites with mercury was carried out at the Center for Energy, Environmental and Technological Research (CIEMAT) in 2017, a webinar on Communication of Mercury risks (2018). As air could be an obligatory matrix to measure the effectiveness of the Minamata Convention, the PSC decided to hire the Consiglio Nazionale delle Ricerche (CNR) from Italy, to obtain primary results from passive air monitoring samples taken from September through October 2018 (5 weeks) at each participant countries' selected sites. The report for this activity was not available for review since this information is considered confidential by the participant countries. An inter-laboratory exercise for different matrices with the Research Centre for Toxic Compounds in the Environment (RECETOX), Brno, Czech Republic (2018) was also performed.
- 253. Argentina established a strategy for elaborating its national risks under 5 cross-cutting areas: i) work on information gaps; ii) research to identify vulnerable population groups; iii) elaboration of studies on current in facilities that release and/or as a result of mercury handling; iv) elaboration of mercury sound management practices and; v) elaboration of awareness strategies to disseminate amongst the population.
- 254. Based on the information generated by the project, Ecuador elaborated its Mercury National Risk Management Plan 2018-2019 which include 4 areas: i) phase-out of mercury uses in artisanal and small- scale gold mining sectors; ii) minimization in the use of mercury containing products and equipment; iii) optimization of management and disposal of products and equipment containing mercury; iv) implementation of waste water treatment systems.
- 255. Peru identified the main issues that must be addressed, and elaborated proposals to reduce risk levels: i) report on ore content by the large gold mining sector; ii) awareness

campaign on risks associated with the use of mercury containing products; iii) implementation of a register for gold production from small and artisanal gold miners; iv) improvement in certainty of inlet and outlet quantities from gold mining sector and their monitoring.

256. Uruguay developed a regulation to control the imports, use and disposal of lamps containing mercury as a starting point for the elaboration of its risk management plan.

Status: achieved

#### D.1.4 Mercury management gaps and needs identified

- 257. As mentioned before, all countries made a screening of legal, technical and scientific information available and identified the gaps and needs to address the sound management of mercury products and wastes. Common findings are related to low availability of information from key economic sectors like mining and wastewater treatment facilities for example. Other gaps identified are related to regulations that are not comprehensive or accurate to control mercury uses, its management and disposal.
- 258. Argentina does not have a specific regulation addressing the lifecycle of substances, products and wastes containing mercury, and it is usually dispersed in regulations dealing with hazardous substances, use of chemicals in agroindustry and health sectors.
- 259. Access to information for imports/exports from Argentina Customs Office is restricted by law, since it is considered confidential and thus, data for imports of mercury containing products from key economic sectors is not widely available for review and elaboration of the inventory for example.
- 260. As a federal country, there is a challenge to establish alliances with provincial governments to share information and implementation of collaborative work to address mercury issues. Another gap found was the inexistence of a national policy for treatment and disposal of elemental mercury and the current legislation just addresses disposal of wastes containing this element.
- 261. Ecuador identified the following gaps of information and needs: i) there are no specific regulations to address mercury issues, thus an upgrade of the current legislation will be necessary; ii) bad practices in the mining sector are not considered an offense and it should be included in new regulations; iii) monitoring and control of mercury in the small-scale gold mining sector; iii) current legislation does not define the concept of a mercury waste for products and substances containing this element; iv) there is a need for developing technical standards for mercury management and disposal, as well as good practices for different sectors; v) development of a regulation including mercury in the amount of wastes reported by the National Association of Municipalities.
- 262. Peru identified gaps and needs mainly for upgrading regulations and technical standards for the main economic sectors, and establishment of multisectoral task force to address mercury issues. The following list is a summary of main needs identified: i) implementation of safety and hygiene programs in facilities with mercury releases; ii) elaboration and implementation of programs for prevention and control of intoxication in mining areas; iii) prohibition of imports and production of cosmetic, pesticides and medical products containing mercury; iv) a technological transfer program for the small-scale gold mining sector for replacement of mercury based processes; v) establishment of maximum allowable level of mercury and gaseous releases from the mining sector; vi) availability of technical processes for decontamination of soil and hydric resources.

263. Uruguay identified the following needs: i) improvement in the control of imports/exports of mercury containing products by the opening of the respective national tariff codes; ii) development of new regulations for maximum mercury contents for different type of lamps; iii) technological change to eliminate mercury based processes in the chlor-alkali facility before 2025; iv) updating of the national inventory; v) inclusion of mercury as compulsory monitoring parameter for basins and water courses; vi) technical standards for storage and disposal of mercury and its wastes at the end of its lifecycle; vii) revision and update of potentially mercury contaminated sites; viii) development of analytical techniques for determining mercury in human hair, blood, urine and food; ix) determination of mercury baselines for populations at risk; x) elaboration of awareness activities or the sanitary sector on management of wastes and their disposal.

Status: achieved

#### D.1.5 Lessons Learned available and shared regionally

264. All countries submitted reports on lessons learnt and these were shared and discussed during the project closure workshop (2017). Main lessons learnt distilled are related to the project administrative process and necessary conditions for successful implementation: i) proper adaptive management from BCCC-SRC was critical for the project success; ii) establishment of national multisectoral taskforces allowed the participation of the different type of knowledge needed to address diverse issues resulting from mercury uses and production and enhanced the political support needed for the implementation of the project and the measures to protect human health and the environment; iv) success in chemicals' management requires the settlement of a mechanism of coordination and collaborative work with all stakeholders involved in mercury issues; v) establishment of committees that facilitate the transfer project responsibilities and commitments in cases of changes of authorities contributes to improve project performance; vi) identification of local financial intermediates and definition of strategies and mechanisms for transferring funds should be addressed during the project elaboration stage; vii) the cooperation international accelerated the implementation of the MC in some of the countries; viii) perception of potential partners from private sector and organizations like NGOs should be assessed during the project preparation and define objectives, targets and activities accordingly to ensure viability for compliance by these partners.

265. BCCC-SRC implemented a regional workshop where these lessons learnt where discussed, but there is no publication or report posted in the BCCC-SRC or participant agencies/governments websites, thus limited dissemination of these lessons would be expected. It was reported that these lessons learned would be published in 2019.

Status: partially achieved

#### D.1.6 Regional understanding of Hg challenges enhanced

266. This project was implemented jointly with the MIA project involving additional 6 countries from the LAC region. During this evaluation, most actors perceived that the enhanced exchange of experience with countries resulting from this joint implementation contributed to understanding of the challenges that LAC countries must address to implement the Minamata Convention. Similarities and specific circumstances amongst participant countries were also identified and collaborative work facilitated the implementation of the project in each individual country. Finally, as a result of the approach implemented by BCCC-SCRC, an informal network was set for LAC countries that would be a source of exchange and collaboration in the future.

267. As illegal small-scale gold mining is a relevant issue in Peru and Ecuador, the Peru's national coordinator cooperated with a specialized unit from the Ministry of Mining responsible for collecting information about illegal mining and work conditions and it promotes regularization among these small miners. The project helped this unit to understand the environmental problems associated to this type of mining activity to include this issue in its plans.

Status: achieved

#### Stakeholder Ownership and Usefulness

- 268. Based on the information made available to the evaluator, the project outputs were achieved to varying levels of success and the project either enhanced or built the necessary capacities for identifying the main issues affecting human health and environment from mercury releases in every participant country. Annex 11 shows a summary of the main activities implemented by the project, which resulted in the outputs described in this section.
- 269. Although the project achieved most of its desired outputs, there is a situation that needs to be considered and it is related with the participation of key stakeholders involved in the process of the elaboration of the inventories. All countries appointed national consultants (a consulting firm elaborated all the products in Ecuador) that faced serious barriers to collect the information needed to run the toolkit. Some consultants had access to the information in some sectors, but in Argentina for instance, there is limited access to customs data due to a law that ensures confidentiality to companies/individuals importing/exporting goods. Some ministries have limited or aggregated information about mercury uses in small gold mining activities, since there is incomplete information about mercury sales from large mines that have mercury as by-product. In most of the participant countries, there is no obligation to report both, mercury stocks and uses for elaborating national inventories.
- 270. All countries developed their national inventories, but key stakeholders like the Health and Energy Ministries in Argentina, the Mining Ministry in Peru, and Health Ministry in Uruguay have not yet endorsed the results from the national inventories. The same situation applies to the private sector involved. Some reasons invoked are that companies have their own calculations that do not match with the inventories, but these companies do not share their results making difficult to make comparisons on both methodology and assumptions used.
- 271. Although the use of the toolkit is definitively considered useful and valuable by all participant countries, and it facilitated technical exchange among national consultants with the international expert that elaborated the toolkit. However, it has some technical challenges that would limit its use in the future. Firstly, it is an excel sheet and as such, it is not user friendly and data requires to be entered manually, thus an upgrade as a software would greatly enhance its use. Secondly, the user manual for this toolkit is focused on the use of the tool, but it does not provide any guidance on how to collect the data and check for consistency. Third, the language used by the toolkit is not in line with that used by the Minamata Convention, thus some results would not mean the same for both.
- 272. Finally, although most outputs were achieved at varied degree of success, their achievement needed much more time than that initially planned in the project document, and the project presented a delay of approximately two years.

Rating for delivery of outputs: Moderately Unsatisfactory

#### D.2. Achievement of direct outcomes

#### D.2.1 Participating LAC countries are able to identify mercury sources

- 273. Four national inventories were developed under this project using an innovative approach that included the use of a standardized instrument to assess mercury emissions and releases (UN Environment toolkit) in each participant country. On the other hand, the elaboration of these inventories required the coordination, participation and cooperation of all stakeholders involved and who own the critical information required to use the toolkit.
- 274. Personnel from all participant countries were trained on the use of the UN Environment toolkit to assess mercury sources, thus skilled professionals are available for continuous update of the national inventories.
- 275. On the other hand, the project introduced a collaborative approach where all national stakeholders formed local committees to identify key information sources and stakeholders who would provide the information needed to elaborate a complete inventory for mercury sources.
- 276. All participants agreed that without cooperation amongst government authorities, private sector, scientific researchers and citizen organizations, efforts to phase-out mercury from different processes and products will be useless.
- 277. In despite of the above, as discussed in paragraphs 264-266, results from cooperation among stakeholders have been limited, and appropriation of national inventories by some ministries, state-owned and private sector companies is not ensured because none of them have endorsed these inventories.
- 278. Therefore, this outcome was partially achieved.

Status: Partially achieved

## <u>D.2.2</u> Participating LAC countries are able to identify priority actions to reduce mercury releases

- 279. All countries identified their existing gaps and needs of information to elaborate more accurate national inventories and regulations to control mercury emissions from different sources.
- 280. All countries elaborated national action plans indicating the measures needed to comply with the Minamata Convention provisions and protect the environment. The range of these actions was adequate and included elaboration of technical standards for management and disposal of mercury wastes, report on ores' mercury content for the gold mining sector, establishment of maximum allowable mercury emissions in some countries, opening of national Harmonized Tariff Codes by Customs to control imports/exports of mercury containing products. The Section D.1 explained in detail the priority actions identified in every country.
- 281. The exchange of experiences between national coordinators from this and the MIA project allowed identification of a wider range of cultural, institutional, political and economic scenarios in the participant countries as well as approaches to identify mercury release sources and the approaches to address and prioritize them were discussed during the regional workshops performed by the project.
- 282. Therefore, this outcome was fully achieved.

Status: Achieved

## D.2.3 Better understanding of mercury risks to human health for participating countries

- 283. Comprehensive training workshops were performed addressing this issue, thus main stakeholders have improved their knowledge about these risks and the measures needed to minimize them. However, more awareness activities for general public are needed in some countries, especially where small-scale gold mining sector.
- 284. All countries implemented either national committees or workgroups to implement this project, where participation of government officials were the main audience. On the other hand, national and closure workshops were also performed, where private sector representatives attended and learned about risks from exposure to mercury releases and products.
- 285. Therefore, this outcome was fully achieved among key stakeholders from governments and private sector companies as expected in the project document. However, further awareness addressed to the general public opinion and citizen organizations is needed to strength support for the results achieved by this project.

Status: achieved

## D.2.4 Better understanding of mercury risks to the environment for participating countries

286. As noted previously, all key stakeholders are aware on the negative effects of mercury pollution and awareness is needed for the general public. Awareness activities specially addressed to small-scale mining sector's workers in countries like Ecuador and Peru are needed.

287. This outcome was achieved as expected by the project document, which focused its intervention in government institutions and key private sector stakeholders.

Status: achieved

#### D.2.5 Understanding of national priority sources enhanced

288. All countries made Level 1 inventories, and the elaboration of national action plans was in process in all countries prior to the implementation of this project and thus, a rough assessment on main mercury sources were already known to all national stakeholders. However, the elaboration of these new national inventories using the standard toolkit for measurement of release sources improved the accuracy and scope of the previous assessments, as a result of the training provided for using the toolkit and the increased exchange of experience with countries participating of the MIA project. In addition, participation of international experts provided by UN Environment, contributed to update the understanding on how these emission sources can be identified and their negative impacts assessed.

289. Therefore, this outcome was achieved according the expectations of the project document.

Status: achieved

Rating for achievement of direct outcomes: Satisfactory

#### D.3. Achievement of project outcomes

#### D.3.1 Capacity for mercury management enhanced

290. All interviewees reported that this project contributed to improve countries capacities to deal with mercury issues. Analytical skills to determine mercury contents in several matrices (humans, water, air and soil) will allow to accurately measure pollution levels and define right regulations and actions to mitigate this problem. On the other hand, every country is aware of the measures needed to comply with the Minamata Convention and the main sectors needing regulations, improved enforcement and technological upgrades, are all signs indicating that countries are better prepared to address mercury issues than before this project started.

291. However, the problem for accessing information from state owned and private sector companies suggests that mercury management at key production facilities would not be assessed and, therefore, action plans focused on measures that should be implemented at national level only. This review could not collect evidence that main facilities from the production sector owned by private or state-owned companies had improved their sectoral management in all countries. Large mining companies in Peru stated that they apply international standards in their management systems, since most of these companies are owned by transnational firms that apply their standards elsewhere.

292. Overall, this outcome was partially achieved, since governments have better understanding about their needs to improve national environmental management systems, but it was partially achieved in private and state-owned companies, as suggested by the limited participation of this sector in the process of the inventory.

Status: partially achieved

# D.3.2: Countries take actions to revise /develop technical standards on Hg management

293. One of the main project assumptions was that sectors responsible of mercury releases would agree to participate in the elaboration of national mercury inventories, provide data and information during the process and endorse the inventories' results. This assumption would contribute to attaining a better understanding of mercury risks for the environment and human health.

294.During this review, all consultants working on the national inventories pointed-out the difficulties of obtaining data from government agencies, state-owned and private companies holding this information. As in Peru and Ecuador, mining sector activities are not required to report on their mercury emissions and data of use of mercury and production on small-scale gold mining sector were not recorded or incomplete.

295. It was also stated that use of consultants' personal contact with companies and authorities was of critical importance to reach the different sources of information on mercury releases.

296. The national environmental ministries/agencies from each country were found to support the implementation of the project activities, but considering the low level of co-financing achieved, commitment from other national state sector partners was limited. Another indication for this partial support from government actors is the fact that results from national inventories have not been endorsed by relevant government authorities like Ministries of Mining, Energy, Health and production sectors.

297. The above is an indication that the assumption of willingness of cooperation on the implementation of the inventories was partially present and depended on the discretion of the national consultants, as provision of information is not mandatory in all countries.

298. However, the outcomes and outputs leading to this intermediate state have been achieved and are available for further actions that each government will have to take in order to comply their international commitments. In this regard, all countries have identified main release sources and elaborating new regulations to control activities in key sectors.

Status: partially achieved

#### D.3.3: Countries take actions to revise/develop regulations and public policies

299.Main assumptions were the willingness for participation from government institutions and other stakeholders to participate in project activities. The second assumption was training was to be provided to the countries in order to strength management and technical skills for elaborating national action plans and monitoring activities on mercury sources. The third assumption was that collaboration and coordination among participant countries would be exercised.

300. The elaboration of proposals for new regulations was enhanced when national environmental ministries/agencies obtained legal capabilities to draft new regulations like in the case of Uruguay where DINAMA elaborated a proposal for controlling mercury contents in lamps and promoted the incorporation of new national customs entries to the customs harmonized system to track imports of some specific lamps containing mercury. However, this impulse decreases when other government partners have to elaborate these regulations as for example in Ecuador, where the project elaborated in 2018 a "National Risk Management Plan for Mercury" whose implementation greatly depends on the Ministries of Health and Mining. Advances were noted in Peru, where DIGESA approved in 2018 a new regulation to control hazardous wastes in the hospital sector and the approval in 2019 of the "National Action Plan for Application of the Minamata Convention on Mercury" 15.

301.On the other hand, training was provided to all countries through national and regional workshops on hazardous waste management, use of the toolkit to elaborate the national inventories, and hands-on workshops for personnel working in analytical laboratories were organized in renown European laboratories.

Status: partially achieved

#### D.2.7 Better practices implemented in future projects

302. Lessons learnt from this project were distilled, shared and discussed by all participant countries from the LAC region, but as the project is just finishing its activities, there is no indication that these lessons are being applied in the elaboration of new projects. However, most of government officials that participated in the project are still working in their respective institutions, thus the likelihood of applying best practices in future projects is high in this regard.

303. One of the main lessons learnt indicated that financial intermediates for canalizing project funds should be identified during the project preparation stage, but there was no evidence of implementation at the time of the evaluation.

<sup>&</sup>lt;sup>15</sup> Presidential Decree No 004-2019- MINAM, El Peruano, April 4th, 2019.

- 304. Regarding the usefulness of these lessons learnt, one of the main conclusions for government officials, is that this type of environmental issue cannot be solved in isolation, thus collaboration and solutions applied in realistic steps will be needed.
- 305. All documentation and interviews also revealed that international cooperation is needed to address and boost the implementation of Minamata Convention in the countries, thus these kinds of projects are perceived as important to introduce these issues in government agendas, and as a source of funding for the countries.
- 306. Therefore, this outcome will probably be achieved in the short and medium term, as new projects come out.

Status: partially achieved

#### D.4. Likelihood of impact

307. The approach to the use of TOC in project evaluations is outlined in a guidance note<sup>16</sup> issued by the UN Environment Evaluation Office and is supported by an excel-based flow chart<sup>17</sup>. Essentially the approach follows a 'likelihood tree' from direct outcomes to impacts, taking account of whether the assumptions and drivers identified in the reconstructed TOC held<sup>18</sup>. A discussion on the likelihood of/or the extent of achieving the intermediate states is also required.

- 308. The main assumptions and drivers identified by this evaluation are all cross-cutting to every causal pathway in the TOC. For instance, the assumption of that government and private sector stakeholders are willing to participate is present through all project activities reviewed, being this participation of critical importance in the elaboration of national inventories and upgrade of current regulations.
- 309. Another important assumption is the presence of international cooperation for funding to boost intermediate states towards impacts in the medium and long term.
- 310. The general assessment made during this evaluation, suggests that "willingness to participate" (in terms of facilitating information, adopting good practices, reveal current mercury management practices in different economic sectors) was only partially present in government and private sector actors, considering the difficulties encountered to collect information from these sources during the elaboration of national inventories. Cooperation and coordination from government institutions other than environment agencies/ministries need further strengthening to achieve full participation.
- 311. The international cooperation as a driver to sustain and boost improvements in national environmental management systems and ensure compliance with international conventions, in this case the Minamata Convention, is present along all this project and it is considered a key factor by all countries involved in this project.

# Intermediate State 1: Countries enforce regulations and public policies to diminish risks from Hg exposure

312. The main assumption was that governments were to prioritize mercury sources and issues at national level. The project contributed to assessing main mercury release sources by developing national inventories and conducted a screening of information on monitoring of mercury in different environmental matrices and humans. At the same time, studies to

<sup>16 &</sup>quot;Use of Theory of Change in Project Evaluations", Last reviewed: 26.10.17; Evaluation Office of UN Environment

<sup>17 &</sup>quot;Likelihood of Impact Assessment Decision Tree" (12\_Likelihood\_of\_Impact\_Decision\_Tree\_17.04.18.xls); Evaluation Office of UN Environment.

<sup>&</sup>lt;sup>18</sup> 1\_Criterion\_rating\_descriptions\_matrix\_22.01.19.pdf; Evaluation Office of UN Environment.

identify gaps in current regulations and highlight key sectors to be addressed by the regulations was performed in all countries.

- 313. As a result, all countries developed their national actions plans to improve the national mercury management systems and priority actions, thus <u>this assumption held</u> during the whole project life. It is worth noting that Peru is the only country which approved a regulation establishing its national action plan for the application of the Minamata Convention in the country.
- 314. However, although proper regulations would be in place, weakness in monitoring and enforcement is an institutional issue in all participant countries and its solution is beyond of project capabilities. Main drivers for improving this situation would be the presence of international cooperation to assist participant countries to strengthen government enforcement agencies, but this is beyond national capabilities of the government officials that participated in the project.

Status: Likelihood of being achieved: moderately unlikely; assumptions held; drivers: partially in place

# Intermediate State 2: Countries apply technical standards to diminish risks from Hg exposure

- 315. This intermediate state also depends on willingness of stakeholders to participate and adopt new technologies and best practices for their operations. As was mentioned earlier, this assumption was partially presented in this project as difficulties to collect information from these stakeholders was identified as a major challenge during the elaboration of national inventories.
- 316. As it was not possible to assess mercury management systems in most of the state-owned and private sector companies, the willingness for adopting new technical standards by these actors could not be proved. Some interviews with representatives from the large mining sector in Peru, revealed that large transnational mining companies transferred their technical standards and practices to all their operations worldwide, so it is probably that this and similar sectors apply improved technologies to avoid mercury releases. What is happening in small and medium size companies operated by both governments and private sector is not clear at this time, thus it is most probable that this assumption was partially held during the implementation of the project.
- 317. However, this intermediate state would be completely attained if national coordinators from participant countries (drivers) continue to advocate and raise awareness in their home countries (drivers). It is highly probable that this assumption will be maintained in the future, since these officials are responsible for mercury issues in their countries.

Status: Likelihood of being achieved: Moderately Unlikely; assumptions partially held; drivers: in place

# Intermediate Levels 3 & 4: Countries not participating in the project take actions to revise /develop technical standards, regulations and public policies on Hg management

318. The main assumption for these intermediate levels is that participant countries can successfully develop and apply technical standards and regulations, in order to demonstrate the practical feasibility of these measures. This would trigger replication of good practices and regulatory processes in other LAC countries and beyond.

319. This review indicated that actual development of national sound management systems is still underway in all LAC countries, as new proposals need further discussion among key stakeholders before approval, provided that national project coordinators will continue to push regulatory reforms. As example of these actions taken by countries from LAC and other regions, GEF has approved dozens of projects to address similar mercury management issues in order to allow compliance with Minamata Convention provisions and avoid unwanted harmful emissions to the environment and affectation to human health<sup>19</sup>. Therefore, the assumption is still present, but it will need time to bring about some results considering the varied degree of development of mercury management systems in LAC countries.

Status: Likelihood of being achieved: Moderately Likely; assumptions held; drivers: in place

320. The project's desired impact is stated as "Risks to human health and the environment from mercury releases reduced". Based on the assessment above it can be stated that this project contributed to improve countries knowledge to prioritize mercury sources, identify regulatory and information gaps to improve sound management for this pollutant. Outputs from this project have been used as inputs for other projects in most participant countries, but all of them face the issue of this environmental problem still depends on funding from international cooperation; it is difficult to obtain information from government institutions and private sector companies to assess mercury use, releases and management practices. Effective enforcement of existing and new regulations is still a challenge in all countries and that would either prevent, delay or minimize effectiveness in reducing mercury emissions in all countries, thus the overall rating for this item is "Moderately Unlikely".

#### Rating for likelihood of impact: Moderately Unlikely

#### E. Financial Management

#### E.1. Completeness of project financial information

- 321. The cooperation agreement between UN Environment and BCCC-SCRC was signed in May 2014. Argentina, Peru and Uruguay signed their agreements with BCCC-SCRC in 2015, and Ecuador signed in November 2016, leading to a significant delay in the implementation of project activities specially in the case of Ecuador.
- 322. The identification of national financial intermediates that would manage the project funds locally was also an issue, and BCCC-SCRC had to manage these funds for Peru, Ecuador and Uruguay.
- 323. Audit requirements were established under the agreement between UN Environment and BCCC-SCRC: Annual audits until December 31, and the respective reports submitted before June 30 of every year<sup>20</sup>. This meant 5 audit reports should be available for review (2014, 2015, 2016, 2017 and 2018), but only 2 were made available to the consultant, but it was reported that the rest of the audits are being performed in 2019.
- 324. According to data provided by BCCC-SCRC, the impact of project extension on the original budget cannot be determined, since the information provided does not allow to perform this analysis. The UN Environment format based on budget lines and not on project

<sup>&</sup>lt;sup>19</sup> http://www.thegef.org/projects-faceted?search api views fulltext=mercury&page=1

<sup>&</sup>lt;sup>20</sup> PCAl2014I0-02 GFL-2310-2760 -4E47 "United Nations Environment Programme Project Cooperation Agreement (PCA) for a Global Environment Facility Medium Size Project Development of Mercury Risk Management Approaches in Latin America, May 2014.

outcomes make it difficult to identify re-allocation of resources among the different outcomes.

- 325. The analysis of the financial information was a difficult issue in this evaluation. Since UN Environment report templates do not track expenses by project components and subcomponents as described in the GEF's project document, but it uses general budget lines like "consultants", "personnel", "training", etc., it became difficult to assess where the money is spent. For example, the appendix 3 of the project document presents planned budget by year and component, but the actual annual expenses are presented by UN Environment budget lines, making impossible to track expenditures by every component and year of project execution.
- 326. The quarterly reports submitted to UN Environment also show the expenses by budget lines and there is no way to track these expenses by each project component neither.
- 327. Co-financing reports are also presented in terms of UN Environment budget lines that do not have relation with GEF projects tables which are elaborated with project components. Discrepancy between both formats is a barrier that makes it difficult to track expenditures and co-financing by project components, as it is usually done in most GEF financed projects.
- 328. During the revision of the project financial figures, uncomplete co-financing reports were noted: whereas Peru and Ecuador sent their reports based on the UN Environment template, Argentina sent a letter indicating the main in-kind contribution made, and Uruguay has not yet reported its contribution.
- 329. The executing agency presented two independent financial audits in order to assess adherence to standard international practices for fund management. Both audits concluded that funds are managed according to standard practices. However, these audits covered periods from June-July instead for January-December as stipulated in the agreement between UN Environment and BCCC-SCRC. For the period July 2015-June 2016, the expenses made by Argentina, Ecuador, Nicaragua and Peru were excluded from the analysis since the auditor was unable to obtain sufficient appropriate audit evidence for their records and documents supporting such expenses<sup>21</sup>.
- 330. For the period June 2014-July 2015, the auditor recommended to make a reference to the project involved in the printed copy of the purchase orders and establish a more precise system where the staff would register the tasks carried daily in order to make the allocation of fees more objective<sup>22</sup>.

#### E.2. Communication between finance and project management staff

- 331. Regarding the communication between UN Environment financial staff and the project, it can be concluded it was smooth, but again, issues that should be addressed to reconcile GEF and UN Environment report formats were not discussed with BCCC-SCRC during project implementation.
- 332. Sharing of criteria by which UN Environment's terminal reviews assess project management practices was not provided during project implementation.

 <sup>21 &</sup>quot;Laboratorio Tecnológico del Uruguay: Development of mercury risk management. approaches in Latin America, Project 70115.4; July 2015 - June 2016; Grant Thornton Uruguay, September 28, 2016.
 22 IDEM 15; September 29, 2016.

#### 333. Table 8 shows the rating for this item according UN Environment criteria.

Table 8: Financial Management Table

Fin	ancial management components:	Rating	Evidence/ Comments
	1. Completeness of project financial information <sup>23</sup> :	MU	Not all annual audits reports were provided for review, and formats for annual expenses and cofinancing do not allow to assess impacts of extensions on project costs and it is not possible to analyse expenses per project component/outcome.
	ovision of key documents to the evaluator (based on the ponses to A-G below)		Not all information was provided <sup>24</sup> .
A.	Co-financing and Project Cost's tables at design (by budget lines)	Partly	Received 3 quarterly expense reports for 2015, 2016 and 2017.
В.	Revisions to the budget	Yes	Provided
C.	All relevant project legal agreements (e.g. SSFA, PCA, ICA)	Partly	No all MOUs provided
D.	Proof of fund transfers	No	Not provided
E.	Proof of co-financing (cash and in-kind)	Partly	Co-financing reports submitted by Peru, Ecuador and Argentina, but no support for estimations made in these reports.
F.	A summary report on the project's expenditures during the life of the project (by budget lines, project components and/or annual level)	No	There was not a single report consolidating expenses over the years, just annual reports by budget lines were provided.
G.	Copies of any completed audits and management responses (where applicable)	Partly	Received two audits reports for June 2014-July 2015 and July 2015-June 2016.
Н.	Any other financial information that was required for this project (list): Annual Expenses by outcome	Partly	Not provided by BCCC-SCRC
ind	y gaps in terms of financial information that could be icative of shortcomings in the project's compliance <sup>25</sup> h the UN Environment or donor rules	Yes	The executer provided information in UN Environment formats based on budgets lines, making impossible to analyse expenses by project outcomes.  Co-financing reports incomplete.

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<sup>&</sup>lt;sup>23</sup> See also document "Criterion Rating Description", Update 04.04.2018 for reference

<sup>&</sup>lt;sup>24</sup> BCCC-SCRC reported that audits for 2017, 2018 and 2019 were underway in August 2019.

<sup>&</sup>lt;sup>25</sup> Compliance with financial systems is not assessed specifically in the evaluation. Nevertheless, if the evaluation identifies gaps in the financial data, or raises other concerns of a compliance nature, a recommendation should be given to cover the topic in an upcoming audit, or similar financial oversight exercise

Financial management components:	Rating	Evidence/ Comments
Project Manager, Task Manager and Fund Management Officer responsiveness to financial requests during the evaluation process	MS	Although communication was good, not all information could be collected.
Communication between finance and project management staff	MS	Although communication with finance staff was good, not all information was checked for consistency, like the completeness of annual audits, and no participation is seen for solving the financial intermediate issues.
Project Manager and/or Task Manager's level of awareness of the project's financial status.	MS	Just 2 out 4 audits performed.
Fund Management Officer's knowledge of project progress/status when disbursements are done.	S	Disbursements on time
Level of addressing and resolving financial management issues among Fund Management Officer and Project Manager/Task Manager.	MS	Key issues regarding financial intermediates were solved satisfactorily, but not active participation of finance officials is evident.
Contact/communication between by Fund Management Officer, Project Manager/Task Manager during the preparation of financial and progress reports.	S	Good relationship/communication was noted.
Overall rating	MU	Main factor that determined this rating was the usefulness of financial formats to perform expenditure analysis as requested by GEF.

#### Rating for financial management: Moderately Unsatisfactory

## F. Efficiency

#### F.1. Implications of delays and no cost extensions

- 334. As discussed before, the project presents an implementation delay of almost two years, which is related with changes in authorities in some of the participant countries that prevented the signing of the respective MOUs. Ecuador changed the Minister of Environment three times during project implementation and MOUs for Argentina, Peru and Uruguay were signed in 2015, and Ecuador in November 2016.
- 335. Related with the above, identification of financial intermediates to manage the funds in each country was a serious problem that prevented project disbursements. The issue was solved with the decision of making BCCC-SCRC the agency that managed the funds for Peru, Argentina and Ecuador. This issue was identified for all participant countries as the result that financial intermediates were not identified during the project elaboration. Thus, previous agreements on conditions to manage project resources at local level with national financial entities would have facilitated the transfer of funds to the participant countries.
- 336. Although BCCC-SCRC implemented some time and resource savings measures, there was no way to assess the impact of these in the budget, but they clearly affected the sequence and opportunity of delivery of project outputs.

- 337. The impact on project finances from the extension cannot be assessed since financial reports do not permit to check if there were reallocations of resources from one component to another to cover expenditures for personnel working in the project, for example.
- 338. Regarding the project cost effectiveness, it is not possible to assess it with the information available. The same applies for the cost effectiveness by component, due to the reasons of inconsistency of the financial format reports between GEF and UN Environment.

#### F.2. Time-saving measures put in place to maximize results

- 339. BCCC-SCRC made two key decisions that allowed savings of both, time and GEF resources. The first decision was the close implementation of this project with the MIA regional project, both executed by BCCC-SCRC. This decision was aimed to have a positive impact on both project finances from savings coming from air tickets, accommodation, venues for workshops and international consultants.
- 340. The second decision taken was the management of funds for Peru and Ecuador by BCCC-SCRC, which facilitated the implementation of project activities in these countries, by directly hiring consultants and services proposed by the national coordinators and performing the required disbursements.
- 341. Another good adaptive practice implemented by BCCC-SCRC was its flexibility to accommodate new demands and priorities from national project coordinators, leading as a result to better ownership and relevance of the project results for each country. As an example, Peru had a crisis with mercury pollution in Madre de Dios (an artisanal gold mining area) and UN Environment and BCCC-SCRC provided international experts to assist in the solution for this problem.

#### F.3. Use of/building on pre-existing institutions and complementarities

- 342. The organization of the project took the advantage of appointing known institutions with long expertise in chemical issues. The executing agency was BCCC-SCRC which is a regional coordinating center for Stockholm and Basel convention for LAC region. The national executing agency in Argentina was the BCRC that is a coordinator of the Basel Convention for South America. The executing agencies in Ecuador, Uruguay and Peru were the ministries/secretariats of environment that today are the focal points for the Minamata Convention. The experience of all these institutions would have been enough for smooth project implementation at national level. However, these institutions are usually affected by government changes that prevent decision taking processes during the transition to a new government or environmental authority.
- 343. As discussed before, the partnership created with the regional MIA project provided, according to the BCCC-SCRC and UN Environment staff, savings and expanded the scope of discussions and exchange of participant countries from both projects, having as a results that national coordinators would get a wider view on mercury issues and elaboration of policies and plans to control emissions since more diversity of countries, scenarios, issues and potential solution pathways were discussed during workshops, training sessions and expert exchange.
- 344. However, as the most outputs were delivered late, and there is no way to assess the impacts of project extensions in the general budget, the overall assessment for this section is rated as "moderately satisfactory".

#### Rating for efficiency: Moderately Satisfactory

#### G. Monitoring and Reporting

#### G.1. Monitoring design and budgeting

- 345. The project document established a schedule for key deliverables in order to track project progress during its implementation along with approximate dates for conclusion as per PIR reports. Some key deliverables not included in the project document are also shown.
- 346. As a first comment, signing agreements between BCCC-SRC with individual countries does not appear in the original schedule, this it is seems that this important milestone was not considered as a risk for this project. As it can be seen from the table, most of the important products like national inventories, analytical strengthening and national risks approaches were significantly delayed. Most of interviewees pointed out that this type of projects should have a more realistic timetable and objectives, and they should consider time needs of individual participant countries.
- 347. The project document also established that a M&E plan should be elaborated as part of Outcome 4, but the logical framework only mentions implementation of Steering Committee meetings. Guidelines for contents of this plan are shown, however, in Appendix 10 of the project document (Terms of Reference Standard Terminal Evaluation).
- 348. A total of US\$ 56,000 were assigned in the project budget for the implementation of the M&E plan<sup>26</sup>, but analysis of expenditures under this heading could not be made in this review, since formats for expenses reports do not allow this analysis. No assessment for the properness of this budget can be done neither, as no M&E plan was elaborated.
- 349. It seems this plan was confused with annual planning of activities, as PIRs defined M&E as an activity carried out during the whole project. The project document also considered this M&E plan as a constant activity, as it appears on Appendix 7: Workplan and Timetable.
- 350. Therefore, M&E activities were performed without the existence of a plan, and some GEF important tracking tools were not used, and in absence of M&E reports, it can be concluded that monitoring and evaluation activities lack a systematic application according to defined parameters and they would be considered insufficient to track project progress.

#### **G.1.1** Quality of project indicators

- 351. The analysis of the logical framework shows that most of indicators are for products and activities. Workplans and M&E plan are included for outcome 1.
- 352. For Outcome 2, national inventories are used as indicators of better understanding of mercury risks to humans and environment. However, identification of emission sources does not provide by itself a better understanding of these risks, since training, scientific research and awareness activities would be better instruments to enhance the knowledge on these risks. It seems that the situation is the reverse: the understanding of mercury risks was known before the identification of their sources thus elaboration of national inventories is the result of this previous awareness. Perhaps a better indicator for outcome 2 would be "improved accuracy/coverage in estimated mercury releases compared with previous inventories".
- 353. For outcome 3, perhaps "risk management plans including monitoring and performance assessment activities" would be a more interested indicator than "number of mercury priorities" or "number of data set collected", being the late ones more indicative of products. Another potential indicator referring to the use of the new capabilities provided by

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<sup>&</sup>lt;sup>26</sup> Project document Appendix 2: Overall Project Budget

the project "% of increase in analytical analysis performed by strengthened labs" or "increase in analysis at national level performed".

- 354. Outcome 4 also included activity indicators like "number of PSC meetings" or number reports submitted. A more specific indicator for "lessons learnt" would be "new projects, regulations and technical standards developed by LAC countries incorporate best practices distilled by the project".
- 355. As a summary, the definition of indicators for this project are referred to products and activities. Although they are easier to measure and monitor, they do not provide additional any indication about the use of these products or their quality.

#### Rating for monitoring design and budgeting: Highly Unsatisfactory

#### G.2 Monitoring implementation

- 356. The implementation of the M&E system was based on the progress of delivery of products, activities and collection of the studies, consultancy reports, workshops and provision of expertise from international experts to track inventory data and their consistency.
- 357. It was noted that the PSC was composed by the same national coordinators that were implementing the project at local level (PSCs are usually composed by high level authorities and it supposed to provide strategic guidelines to implementers). This PSC was conceived by the project management as a coordinating group, thus there was not a real PSC for this project.
- 358. The BCCC-SCRC also implemented regional workshops where countries tracked the performance of the project and proposed activities and adaptive management to improve project implementation speed and results. A midterm workshop was organized in November 2016 where national coordinators, BCCC-SRC Coordinator and UN Task Manager made a self-evaluation exercise to introduce important changes in the project. Although mid-term reviews are not mandatory for small and medium-size GEF projects, this activity was included in the M&E plan and it constituted a good effort to assess project progress. However, this type of self-evaluation is not optimal, and it would be better to consider a third independent party in order to obtain a more objective review and conclusions.
- 359. A final workshop was also implemented in order to discuss the results obtained and lessons learnt among all participant countries from both regional projects.
- 360. Informal communications among BCC-SR, UN Environment staff and national coordinator was also used to track project progress.

#### Rating for monitoring implementation: Moderately Unsatisfactory

#### G.3 Project Reporting

- 361. The project document established a schedule for issuing timely reports which is shown in *Table*9. BCCC-SRC and national coordinators submitted their quarterly and annual reports on expenses and progress on activities.
- 362. The M&E system implemented by BCCC-SCRC relied on by-annual activity reports submitted by each national project partner (BCRC, DINAMA, MAE, MINAM).
- 363. The national reports provided for review by BCCC-SCRC are from Argentina only, no samples were available for Peru and Ecuador. These reports use a table template describing the products and activities, along the planned deadlines for their completion. The progress for these is indicated by a percentage whose base for determination is not explained and

relative importance of these products and activities in the desired results are not stipulated, thus in theory all products/activities have the same importance for obtaining the desired project objectives. National progress reports also included a section for reporting risks and their management, but the sample of reports revised do not contain any identification of potential or actual risks.

364. Based on the information received, BCCC-SCRC compiled relevant information and submitted its bi-annual progress reports, along the annual PIRs. These progress reports had the same format than those used for national progress reports, thus they present the same shortcomings such as lack of assessment of risks or identification of critical activities.

Table 9: project reporting schedule and responsibilities according the project document<sup>27</sup>

Reporting requirements	Due date	Responsibility of	Current status
Procurement plan (goods and services)	2 weeks before project inception meeting	Project Coordinator	Not available for review
Inception Report	1 month after project inception meeting	Project Coordinator	Submitted (no date available)
Progress report (technical and financial)	Half-yearly on or before 31 January	Project Coordinator	submitted
Project implementation review (PIR) report	Yearly on or before 31 July	Project Coordinator, UNEP TM and FMO	2015, 2016, 2017 and 2018 (draft)
Minutes of steering committee meetings	Yearly (or as relevant)	Project Coordinator	2 available
Mission reports and "aide memoire" for executing agency	Within 2 weeks of return	UNEP TM	One available (Nov. 2017)
Final report	2 months of project completion date	Project Coordinator	Not submitted (in draft at December 2018)
Final expenditure statement	3 months of project completion date	Project Coordinator	Not yet available
Mid-term review	Midway through project	Task Manager/ UNEP EO	Self-assessment report made by the PSC (Oct. 19, 2016)
Independent terminal evaluation report	6 months of project completion date	UNEP TM in coordination with UNEP Evaluation Office (EO)	Ongoing at March 2019.
Yearly audits	3 months after each calendar year	Project Coordinator	Only 2 available for review (2014-2015; 2015-2016)

365. Implementation of M&E activities were made using revised annual workplans indicating schedules for attainment of outputs and activities, as found in the PIRs reviewed.

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<sup>&</sup>lt;sup>27</sup> Appendix 8.

366. For financial tracking, the BCCC-SRC compiled quarterly reports on expenses and then elaborated consolidated annual reports based on UN Environment templates, which as it was mentioned before, these templates did not show the information needed by GEF evaluations.

367. In general, most of the progress reports elaborated by the participant countries and BCCC-SRC were based on activities and identification of issues, but no solutions were proposed to solve them. Progress reports based on a M&E plan and the use of the GEF Tracking Tools were not prepared, since a proper M&E plan was not set to measure project progress. The TTs are very important tools for comparing projects' initial, midterm and ending conditions. The GEF Tracking Tools for Mercury projects appeared in June 2015<sup>28</sup>, this is, almost one year after the start of this project, thus its use should have been encouraged.

#### **Project Implementation Reports**

- 368. Perhaps, the most detailed reports were the annual Project Implementation Reports (PIRs) that identified delays and their reasons. It is worth noting that quarterly reports and PIRs did not inform the activities organized by project component, making this difficult to associate some activities to a defined project component and sub-component.
- 369. Reviews of PIR made available to the consultant (2015 and 2018 without ratings, 2016 and 2017 with ratings) included the narrative on annual accumulative progresses, but the content does not follow the project logic, this is, it does not report according project outcomes, thus mixing all components in one section.
- 370. As the project document contained indicators for products and activities, the ratings for project performance (Section 3.1 from PIRs) are based on these activities/products. Ratings for progress towards project objectives (elaboration of inventories) in 2016 appears as "Marginally Satisfactory (MS)"<sup>29</sup>, outcome 2 which is related with this objective is rated as "Moderately Unsatisfactory (MU)"<sup>30</sup>, thus these ratings seem not consistent. Beside this, ratings for outputs and outcomes are well set.
- 371. Regarding risk ratings, PIR 2016 identified that better communication between the executing agency and UN Environment (rated as High risk) and with stakeholders was needed (rated as "Substantial"), thus the ratings seems consistent with the issues encountered during project implementation.
- 372. Project progress improved in 2017, with most "Satisfactory" and "Moderately Satisfactory" ratings. This is in line with the improvement of disbursements made in 2017 (52% of GEF resources). Risk ratings for 2017 declined substantially as well.
- 373. As noted before, a M&E plan was not elaborated, but Section 4 of the reviewed PIRs mentions the M&E plan and responded the sub-sections 4.1 and 4.2 as "Yes" but no ratings are provided. Answers related with the use of indicators and lessons learnt from the implementation of the M&E plan were not responded (Points 4.4 through 4.10 from PIRs).
- 374. It is noted that in general terms, PIRs ratings properly denoted the main risks and level of project performance, despite of some inconsistencies noted for 2016. However, Section

<sup>29</sup> According GEF terminology: **Moderately Satisfactory (MS):** Project is expected to achieve **most** of its major relevant objectives, but with either significant shortcomings or modest overall relevance. Project is expected not to achieve **some** of its major global environmental objectives or yield some of the expected global environment benefits; GUIDELINES ON THE PROJECT AND PROGRAM CYCLE POLICY; April 18, 2017

<sup>30</sup> "Moderately Unsatisfactory (MU)": Implementation of some components is not in substantial compliance with the original/formally revised plan with most components requiring remedial action; idem 20.

<sup>&</sup>lt;sup>28</sup> Chemicals and Waste Tracking Tools (CWTT), June 2015

4: "Rating Monitoring and Evaluation" presented inconsistencies, no ratings and questions not responded, thus strengthening would be necessary to explain the scope of this section, since it seems confused with progress on activities.

#### Rating for project reporting: Moderately Satisfactory

#### H. Sustainability

#### H.1. Socio-political Sustainability

375.Participant countries are able to identify mercury sources and priority actions thanks to the training provided and development of national inventories. However, all countries and consultants interviewed remarked that lack of access to information sources was severe in some cases, and collecting data depended on willingness of holders and personal contacts. Therefore, commitment from some government institutions and private sector companies would be an issue if this tendency of not provide information continues in the medium and long-term.

- 376. Regarding the Environmental Ministries and other government institutions participating of the project, it is expected that changes in authorities would delay some projects/activities in the future, but as the technical personnel are stable government officials, they will continue the activities promoted by the project, thus it is likely that sustainability is ensured.
- 377. All countries have drafted their mercury national management plans and there is evidence that project outputs have been used in newer projects dealing with mercury issues. At the same time, all countries have outlined the actions required to comply with the Minamata Convention which all countries have already signed, thus it is expected that all countries will continue implementing actions to comply with the convention.
- 378. Therefore, sustainability presents a moderate dependency on socio-political factors and the project identified the necessary actions and priorities that should be considered in the elaboration of future laws and regulations, the overall assessment this subsection is likely.

#### Rating for socio-political sustainability: Moderately Likely

#### H.2. Financial Sustainability

- 379. According the interviews made during the terminal evaluation, resources for mercury activities are scarce in all participant countries, thus support for this type of activities would continue to be dependent from international cooperation.
- 380. The project did not elaborate an exit strategy and identification of funding needed for securing the sustainability of project outcomes is still pending. Therefore, an assessment of the resources needed to implement sustainable, sound management systems in all countries is unknown.
- 381. As already mentioned in the report, collecting information to update national inventories is an expensive activity that needs support in new regulations that will require compulsory reporting from mercury sources to sustain accurate national inventories, as well as to assess contaminated sites that would sustain the analytical technics strengthened during by this project. All countries made progresses in drafting these required regulations, but as they are still under discussion, no funding is already secured to update these inventories and remediation of impacts on environment and human health. On the other hand, international cooperation is likely to continue assisting developing countries in their efforts to comply with the Minamata Convention to trigger the required actions to ensure

their effectiveness upon national resources, the financial sustainability for sustaining project outcomes is Moderately Unsatisfactory.

#### Rating for financial sustainability: Moderately Unlikely

#### H.3. Institutional Sustainability

- 382. National executing partners are stable institutions with high level of technical expertise. INTI (Argentina) is a research institution that provides advise to government and companies on better production processes, analytical services and elaboration of technical standards. The personnel working in this issue is stable, so the knowledge is likely to be maintained in the future. The same applies to LATU (Uruguay), since its mission and technical expertise are very similar to INTI. DIGESA is a regulatory entity for food safety and environmental health in Peru, and is capable to perform complex analytical procedures, and it is likely that the technical personnel trained by the project will continue working in this institution. The Ministry of Mining of Peru is also a stable government agency and, among other duties, is responsible for collecting information about illegal mining and work conditions, and it promotes regularization among these small miners.
- 383. In Ecuador, the Ministry of Environment's Under Secretariat of Environmental Quality participated in the project's analytical strengthening activities and determination of mercury contents in humans and environment for country's gold mining areas, thus it is likely that these skills will be maintain in the future.
- 384. Government agencies have limited information about these sources and sharing amongst government institutions is also difficult, for example, in Argentina, since it is a federal nation, the provinces had autonomy and are reluctant to share their information.
- 385. However, there is a key aspect that should be further analysed by UN Environment officials and national coordinators. From document review and interviews arose that results from some national inventories still need further discussion among relevant stakeholders from government and private sectors involved in this issue. If there is not a common understanding on the methodology used and the results obtained, there is a probability that the results from national inventories would have a limited use by these stakeholders. Key sectors like health, waste treatment, energy and mining still need to endorse these results in order to be used as sectoral planning and decision-making tool for both, public authorities and private sector stakeholders.
- 386. Finally, the project did not develop an exit strategy with an institutional component, thus project outcomes are highly dependent on institutional issues, but planning was noted and the need of better coordination amongst government institutions was also identified in most of countries.

#### Rating for institutional sustainability: Moderately Unlikely

#### Overall rating for sustainability: Moderately Unlikely

### I. Factors Affecting Performance

#### I.1 Preparation and readiness

387. BCCC-SCRC prepared a detailed annual work plan and the inception workshop was held in November 2014 in Montevideo, Uruguay. During this workshop, a project Steering Committee was conformed with UN Environment, BCCC-SCRC and national coordinators.

388. Although problems with MOUs signatures were reported in the PIR 2015 (June 2014-July 2015), but there is no evidence that project management anticipated issues regarding securing funds transfer through local financial agencies. An early assessment on risks was not performed in the first steering committee meeting or within the first six months of project implementation.

#### Rating for preparation and readiness: Moderately Satisfactory

#### I.2 Quality of project management and supervision

- 389. BCCC-SRC management took some key decisions that allowed the project to achieve its outputs and objectives. Examples are the decision of a centralized management of national funds by BCCC-SCRC that untangle the implementation of activities, and the merge of activities of this project with the other regional MIA project that resulted in an expanded share of experiences and knowledge for all participant countries of both projects.
- 390. BCCC-SCRC managed well to tackle the challenges imposed by changes in national authorities and the lack of national financial agents that would manage the project funds in some of the countries involved (Peru, Ecuador). In the first place, there was a wide flexibility in the project management in order to introduce the changes desired by the national coordinators. For example, component 3 was changed to redefine subcomponents "3.3: Number of data sets collected and analysed greatly contributed to the development of national risk management approaches" and "3.4: Number of prioritized national mercury risk management approaches for mercury reduction" into something like "action plans" as defined by MIA projects. These changes were considered more in line with the project budget since risk management approaches required more resources than those available in the project and allowed join implementation of activities with other countries participating in the MIA project: "Development of Minamata Initial Assessment in Latin America and the Caribbean" also executed by BCCC-SCRC and UN Environment. The change made to the project expanded the exchange of expertise and experience with another 5 participant countries, which meant better guidance for the countries to overcome the challenges found during project implementation.
- 391. BCCC-SCRC did also make reallocation of project funds in order to meet the different country requirements, thus it re-accommodated project activities to the national needs of participant countries. Besides, BCCC-SCRC also managed the funds for Peru and Ecuador, who requested so to avoid further and unnecessary bureaucratic delays existing in these countries.
- 392. However, an important shortcoming was the inexistence of a M&E plan for the project. This affected the quality of supervision on progress towards project objectives and outcomes.
- 393. Another important issue was the use of template reports for expenditures that did prevented a proper track of expenses by project outcomes. Although this would not affect project performance, it made it difficult to assess cost-effectiveness, impacts of project extensions, allocation of funds according the defined project components and outcomes, and detection of re-assignation of funds.
- 394. Finally, although the project document did not include an exit strategy, BCC-SCRC, UN Environment staff and national coordinators should have discussed and defined this strategy, considering its relevance and standard good practice to improve sustainability of the results attained.

Rating for quality of project management and supervision: Moderately Satisfactory

#### I.3 Stakeholder participation and co-operation

- 395. Although all countries established national committees to discuss and follow-up on implementation of the different project components, there are some evidence that participation was not completely achieved.
- 396. Interviews revealed that results from national inventories have not been endorsed by relevant authorities: Health and Energy Ministries in Argentina, the Mining Ministry in Peru, and Health Ministry in Uruguay.
- 397. This review also revealed that some private sector actors would not agree the results from some of the inventories, since their estimations are different from those of the project. The reluctance of private companies to share their information as input for the inventories suggests that the nature of these national committees and the level of real participation should be assessed before commencing activities.
- 398. PIR from 2016 also reported that better communication between BCCC-SCRC and UN Environment staff, and with stakeholders was necessary.
- 399. As summary, the review indicated that national stakeholders participated in committees that followed-up the project activities. However, collection of information from private company actors and from some government authorities was very difficult, and the fact that some authorities have not yet endorsed the results from national inventories lead to question the real commitment of these actors with mercury issues.

# Rating for stakeholder participation and co-operation: Moderately Satisfactory I.4 Responsiveness to human rights and gender equity

- 400. The project document presents a policy and some specific activities or goals addressing gender issues. It mentions that BCCC-SCRC and national coordinators will ensure "women are well represented" in the national committees and consultations with communities will be made<sup>31</sup>. The role of women on mercury management was to be assessed, representatives of women associations were to be invited to actively participate in the development of risk assessment approaches. Pregnant women are also mentioned as susceptible to risks from mercury releases and in general, women are exposed to risks from cosmetics containing mercury<sup>32</sup>.
- 401. The review indicated that no criteria/guidelines for gender participation was elaborated and shared with participant countries. Although project activities led to benefits to both women and men in terms of exposure to the risks associated with some production processes and products, only Peru implemented a study on mercury contents in facial cosmetic creams
- 402. The project document mentioned Human Rights just once (about Nicaragua's UNDAF) and does not include any policy or activity/strategy for ensuring its inclusion during its implementation.
- 403. In summary, participation of women is high at project management and national committee levels in all countries, and most activities are expected to deal with gender issues, but participation of women organizations or assessments on women needs were not including in planning of activities nor in budgets.

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<sup>&</sup>lt;sup>31</sup> Project Document, page 14.

<sup>&</sup>lt;sup>32</sup> Project Document. Page 37, Appendix 6: Environmental and Social Safeguards.

## Rating for responsiveness to human rights and gender equity: Moderately Unsatisfactory

#### I.4Country ownership and driven-ness

- 404. All countries set national committees formed by several government institutions and some private sector actors. In Argentina, a national committee coordinated by the BCRC included representatives from the Ministries of Health, Industry and Mining, and the Under-Secretariat for Environment. This committee met regularly to discuss and contribute with information to implement project activities.
- 405. Uruguay settled a working group within DINAMA where LATU, the UNDP project on Mercury reduction, the faculty of Chemistry of the state University of La República were also included.
- 406. Peru used the Technical Group for Chemical Substances where key sectors like the Ministry of Mining and Energy, Health and Industry were present. This group discussed mercury issues within the general framework of chemical substances management, thus meetings dealt with general subjects regarding chemicals and it seems that specificities and details of this project were not addressed.
- 407. Ecuador left the implementation of project activities to a consultant firm who delivered all project products and results. Working groups were established during the inception workshop for the elaboration of the national inventory where representatives of the Ministry of Mining participated. Several meetings with regional and local authorities were organized and a workshop to present the project results.
- 408. All countries have signed the Minamata Convention thus they will have to implement all the necessary measures to comply with the convention's main provisions. In this regard, all countries are developing new regulations for mercury containing products and activities related with its use and production.
- 409. The environmental ministries/agencies have led and implemented the project, but further actions are needed to ensure that other government and private sector actors endorse the results from the national inventories. Although inter-ministry committees have been established, institutional coordination amongst state bodies is still an issue to implement the required measures to comply with commitments under the Minamata Convention.
- 410. Private sector participation and ownership also needs more encouragement. In countries like Ecuador and Peru, information on mining activities is not publicly available, and in Argentina data for imports is considered undisclosed information.

#### Rating for country ownership and driven-ness: Moderately Satisfactory

#### I.5Communication and public awareness

- 411. According the interviewees, communication amongst BCCC-SRC, the national coordinators and UN Environment staff was of good level (despite of initial issues on this found during the first stage of implementation).
- 412. All countries implemented several workshops and published the results and studies performed during this project and arranged national inter-institutional working groups where mercury issues were shared and discussed. Thus, introduction of this subject at different government levels were achieved.

- 413. However, awareness and participation of private sector and government owned companies is still insufficient, as revealed the by the issues found to collect information on production processes at this level in all countries.
- 414. In a wider sense, all project activities focused on technical and government officials, but no awareness, nor publications for general public opinion was noted. In addition, the project did not encourage participation of citizen organizations, as evidence from the attendance of workshops implemented in all countries.

Rating for communication and public awareness: Moderately Unsatisfactory

Rating for factors affecting performance: Moderately Satisfactory

## VI. Conclusions, Lessons and Recommendations

#### A. Conclusions

- 415. The project addressed important issues related with mercury management in all countries, thus making it relevant for updating/upgrading information gaps and to improve current regulations or develop new ones. It was also important to GEF and UN Environment in order to strengthen national capabilities of participant countries to comply with national commitments. However, the project had some weakness in its formulation. The M&E system was not properly delineated in the project document, and important components such as the requirement for elaboration of an exit strategy was missing. In addition, elaboration of indicators for outcomes and objectives were mostly for products rather than results.
- 416. The project reached most if its desired outcomes and contributed to effectively identifying information gaps in all countries through the search of current national regulations dealing with mercury and chemicals. In the same way each national inventory updated relevant information on mercury sources and thus, assessed priority actions for decision making processes and elaboration of regulations to comply with Minamata Convention provisions. On the other hand, activities of strengthening of analytical capacities in each of the participant countries contributed to determination of mercury in several environmental matrices such as air, soil, water and fish. Thanks to these, all countries could either elaborate or update their action plans with more precise data for decision taking. Finally, analytical capacities were improved in all countries and it will contribute to update the list of potentially contaminated sites in all countries.
- 417. BCCC-SRC showed good adaptive management capacity to solve the problems related with the impossibility to find proper financial intermediates to canalize the funds assigned to the participant countries. In addition, changes in countries' government authorities and priorities were well managed by BCCC-SRC by adjusting project activities according to the requirements from national coordinators, thus updating and maintaining in this way, the relevance of this project in the participant countries.
- 418. The most noticeable effect of implementing joint activities with the regional UN Environment project "Development of Minamata Initial Assessment in LAC", was the enhancement of experiences shared among participant countries and therefore, more technical, policy and legal instruments could be discussed. As both projects had similar activities that were implemented in common, and the documentation reviewed suggested some savings in resources were achieved but this could not be assessed properly due to the financial reports' format used. The inexistency of a M&E program to track progress on

desired project outcomes, and the implementation of bi-annual standard report templates consisting in progress of activities whose relative importance for the project was not identified and their risks not assessed, was an important shortcoming for assessing project's real progress and risks.

- 420. The project had a grant from GEF of US\$ 916,000 for 36 months of execution and disbursements reached US\$ 817,000 with a remaining of US\$ 98,600 to September 2018, this is, after 51 months of implementation of activities. The co-financing committed in the project document was of US\$ 2,894,434 but actual co-financing reported reached only US\$ 986,470.
- 420. As national financial intermediates in Peru and Ecuador could not be appointed to transfer project funds to the respective countries, the performance of the project was severely affected by this situation as shown by the slow pace of disbursements made in 2014, 2015 and 2016.
- 421. Formats used for expenses and co-financing reports did not allow a more precise analysis by outcomes, outputs and project activities, due to that these formats were designed for reporting by UN Environment budgets lines only. Re-assignation of GEF resources were also made during the implementation of the project, but for the same reasons explained before, an assessment of impacts from project savings or non-cost extensions could not be performed.
- 422. The elaboration of the national inventories generated a dynamic in each country that required that companies and public bodies had to coordinate and participate in national committees to discuss the results on mercury emissions by sources and regulations needed to comply with Minamata provisions. However, some key government agencies such as the ministries of health, energy and mining in Argentina and Peru did not endorse the inventories, and some private companies challenged the inventory findings.
- 423. As an exit strategy to ensure replication and follow-up of project results at national and regional level was not elaborated, it is possible that this experience would have reduced or diffuse impact.
- 424. Private sector and government owned companies do not easily shared their information about production processes, collection of information has been a significant challenge for elaborating the national inventories in all countries, and suggest that ownership of these important project partners needs a further work to identify the right incentives to align them with the adoption of new technical standards without affecting their productivity.
- 425. Although technological and management capacities for dealing with mercury issues have been transferred to all participant countries, funding for these activities still depends on international cooperation, since resources are scarce in all countries that participated of this project.
- 426. This review found that these human rights and gender considerations were mentioned in the project document, but not specific activities dealing with special needs of women or vulnerable groups was present during the implementation of this intervention. However, high participation of women at project management level was noted in all countries, and the activities implemented all have positive impacts in the human rights and gender areas.

## **Project Ratings**

	Evaluation criteria	Summary Assessment	Rating
Α	Strategic Relevance (select the ratings for sub-categories)	Project aligned with main UN Environment objectives and strategic programs and GEF strategic programs and priorities.  Project is relevant for all participant countries for strengthening their institutional and technical capabilities to comply with MC provisions.  Complementary with current MIA projects and ongoing mercury activities carried out by participant countries.	Highly Satisfactory
A.1	Alignment to MTS and POW	Project aligned with main UN Environment objectives and strategic programs.	Highly Satisfactory
A.2	Alignment to UNEP/GEF/Donor strategic priorities	In line with GEF strategic programs and priorities.	Highly Satisfactory
A.3	Relevance to regional, sub-regional and national issues and needs	Project is relevant for all participant countries for strengthening their institutional and technical capabilities to comply with MC provisions.	Highly Satisfactory
A.4	Complementarity with existing interventions	Complementary with current MIA projects and ongoing mercury activities carried out by participant countries.	Satisfactory
В	Quality of Project Design	Project document lack of proper indicators for results, it did not require a M&E plan, does not include adequate gender activities.	Moderately Satisfactory
С	Nature of External Context	Nicaragua withdrawn the project in 2016, and changes in government authorities affected project performance.	Favourable
D	Effectiveness	Summary: although the project achieved most of its outputs with a varied degree of success, and delivered some additional ones, project duration was delayed by almost 2 years. Although most outcomes were achieved and they are important for the attainment of intermediate states, these still need further impulse from government and private sector stakeholders, thus project's impact is moderately unlikely.	Satisfactory
D.1	Delivery of outputs	Although the Project achieved most of its outputs and delivered some additional ones, project duration was delayed by almost two years.	Moderately Unsatisfactory
D.2	Achievement of direct outcomes	Most outcomes were achieved, and they are important to attain intermediate states to sustain project results.	Satisfactory
D.3	Likelihood of impact	Most of intermediate states needed to step to higher level outcomes still need more political decisions, and regulations that are still under discussion in some countries need some time to be approved. Enforcement of these regulations and reporting from regulated entities is still an issue in all countries.	Moderately Unlikely
Ε	Financial Management	Information provided was not suited to estimate key financing statistics for cost-effectiveness, savings and costs by project components. Communication was smooth, but information on issues regarding UN Environment financial report formats and criteria for financial practices by which BCCC-SCRC would be evaluated was nor properly provided.	Moderately Unsatisfactory

	Evaluation criteria	Summary Assessment	Rating
E.1	Completeness of project financial information	effectiveness, savings and costs by project components.	Moderately Unsatisfactory
E.2	Communication between finance and project management staff	Communication was smooth, but information on issues regarding UN Environment financial report formats and criteria for financial practices by which BCCC-SCRC would be evaluated was nor properly provided.	Moderately Satisfactory
F	Efficiency	Cost and time saving measures and impacts from non-cost extension could not be assessed. Timeliness of project implementation was not as expected in the project document, but most of outputs and outcomes were delivered with various degrees of success.	Moderately Satisfactory
G	Monitoring and Reporting	A M&E plan was not elaborated, no use of TT during implementation and limited assessment of risks were noted. Reports provided a limited view on project progress.	Moderately Unsatisfactory
G.1	Monitoring design and budgeting	Indicators focused on products and activities rather than results.	Highly Unsatisfactory
G.2	Monitoring of Project Implementation	A M&E plan was not elaborated, no use of Tracking Tool during implementation and limited assessment of risks were noted.	Moderately Unsatisfactory
G.3	Project Reporting	Reports provided a limited view on project progress.	Moderately Satisfactory
н	Sustainability	The participant countries have stable political systems and institutions and changes are not likely to constitute a risk to sustainability. However, ownership is still an issue regarding that sectoral regulations are needed in order to support project outcomes and their financing, financial sustainability is uncertain, since financing to support project outcomes needs new regulations and mercury activities are still relying on international funds. Finally, some key stakeholders have not yet endorsed the results from some national inventories ((Health and Energy Ministries in Argentina, the Mining Ministry in Peru, and Health Ministry in Uruguay have not yet endorsed the results from the national inventories) and the project did not elaborate an exit strategy to address these issues.	Moderately Unlikely
H.1	Socio-political sustainability	Outcomes have a moderate degree of dependency on political-social factors, but ownership of main government and private sector stakeholders needs more strengthening actions.	Moderately Likely
H.2	Financial sustainability	Mercury activities in most of the countries still relies on internationally funded activities, and regulations securing local funds to update national inventories, reporting and enforcement are still under discussion.	Moderately Unlikely
Н.3	Institutional sustainability	Although most of national institutions participated in the project, collecting information from public owned and private sector companies is still difficult, where some sectoral regulations need to be amended in order to obtain this information. As there is no common understanding on the methodology used to assess mercury emissions, key stakeholders have not yet endorsed the results from the national inventories in some of	Moderately Unlikely

Evaluation criteria		Summary Assessment	Rating
		the participant countries and no exit strategy to address this issue was elaborated by the project.	
1	Factors Affecting Performance	Initial activities on track during the first 6 months of project implementation is noted, but no early assessment of risks performed. PSC did not assess problems caused by change of authorities or for identification of local financial agencies for funds transfer. BCCC-SRC showed good adaptive management to solve key issues related with funds transfer to national coordinators, but as a M&E plan was not in place, follow-up was performed just by activity. Outcomes/activities were not categorized and prioritized by importance or critical nature.  Good participation from environmental ministries/agencies, but less commitment from private sector and other government partners was noted.  Outcomes/activities do not have gender/human rights considerations, but they would have high impacts on improvement in human health conditions and awareness for women and other minority groups.	Moderately Satisfactory
l.1	Preparation and readiness	Initial activities on track during the first 6 months of project implementation is noted, but no early assessment of risks performed. PSC did not assess problems caused by change of authorities or for identification of local financial agencies for funds transfer.	Moderately Satisfactory
1.2	Quality of project management and supervision	BCCC-SRC showed good adaptive management to solve key issues related with funds transfer to national coordinators, but as a M&E plan was not in place, follow-up was performed just by activity. Outcomes/activities were not categorized and prioritized by importance or critical nature.	Moderately Satisfactory
1.3	Stakeholder participation and cooperation	Good participation from environmental ministries/agencies, but less commitment from private sector and other government partners was noted.	Moderately Satisfactory
1.4	Responsiveness to human rights and gender equity	Outcomes/activities do not have gender/human rights considerations, but they would have high impacts on improvement in human health conditions and awareness for women and other minority groups.	Moderately Unsatisfactory
1.5	Country ownership and driven-ness	Key institutions such as environmental ministries/agencies are engaged, but other partners like private sector and other government partners institutions need more involvement.	Moderately Satisfactory
1.6	Communication and public awareness	Environmental agencies/ministries driving the desired change have high awareness of project's main messages, but other partners like private and state-owned companies need further awareness to sustain project results.	Moderately Unsatisfactory
	Overall Rating		Moderately Satisfactory

#### B. Lessons Learned

- 427. Lesson 1. The project experienced major delays in its implementation as financial intermediaries for supporting project activities were not properly identified during the preparation stage, resulting in a severe shortcoming when the project started its activities. This is clearly a deficit in planning and negotiation of institutional arrangements carried-out during the elaboration of the project. Therefore, project managers should take special attention to anticipate this type of situations and advance as much as possible in the definition of financial mechanisms to implement new projects, otherwise problems will arise as soon as a project start its activities.
- 428. Lesson 2. The M&E plan was not clearly defined in the project document and this resulted in the elaboration of inadequate progress report templates with indicators that did not identify critical activities and risks. The consequence of this during the implementation of the project was that M&E was based on progress of activities without any prioritization (at least formally) and indicators that did not reveal the real progress towards the desired results.
- 429. Lesson 3. Merging activities of one project with a similar one proved to bring some benefits -in this case- to all participant countries who could expand the sharing of experiences, and possibly produced some savings in resources as demonstrated by the unspent GEF resources and the quantity of useful additional activities that favoured both projects. However, this was made at the cost of changing some key outcomes that headlined the initial project objective (development of risk assessment approaches). This raises questions about the usefulness of establishing complex and ambitious goals -during the project elaboration-, that are matched with very limited funds available, and that would produce a high level of frustration among actors when implementation starts.
- 430. Lesson 4. As small and medium size projects are not required a mid-term evaluation, some flexibility in the application of important M&E tools to track project progress was noted during this review. A mid-term self-evaluation was performed by the agency which was implementing the project at national and regional level. As a result of this MTR, important changes to some outcomes and budget took place. In addition, the PSC was formed by the same national coordinators, thus the project did not benefit from independent views that would be provided by an external evaluator or from a PSC composed by high level authorities/officials with more strategic views. This should lead to newer projects to think about the convenience of settling this type of institutional arrangements independent from national coordinators in projects that show early symptoms of failure in key issues like transfer of funds or where outcomes seem too difficult to accomplish. Self-evaluations and PSC conformed by project coordinators would not be recommended as a good practice, since root causes for low performance are likely not to be properly identified by individuals who are either committed to implement the project or involved during its elaboration, thus efforts from UN Environment task managers to identify a better approach to assess project performance issues and monitoring should be encouraged for medium and small size projects.

## C. Recommendations

Context:	The project has not been closed yet, so some reports are still under progress and it would be a good opportunity to improve the contents of them. The Project Implementation Report (PIR) describe the progress in a way that it is very difficult to assign which activity belongs to which outcome. These PIRs also reported mixed activities with the other UN Environment MIA project. The draft final project report is still underway, but it does not show how countries organized themselves to implement this project and financial aspects are omitted.  For PIR 2018, the narrative section should be organized by project
	component/outcome. For the project final report, a better description of institutional arrangements at national level and main barriers encountered should be included. Details on changes introduced to some project outcomes/activities and their reasons would also be explained, along with the re-assignation of GEF resources and a more complete data on co-financing. Additional activities performed and their usefulness for attainment of project objectives are also needed. Contributions made by this regional project and the MIA project to the project objectives would also be assessed. They would also indicate if there are current mercury activities in each country that are using the project inputs and how their continuity would be ensured in the short and mid-term.
Responsible:	BCCC-SRC, UN Environment
Time-frame:	Immediately
Indicator for compliance:	Reports following these guidelines
0 1 1	
Context:	Some interviewees stated that some countries' relevant ministries such as health, mining and industry have not yet endorsed the results obtained by the inventories. Some government owned companies and private sector seems not convinced about the inventories' results.
Recommendation 2:	As it seems there are some funds remaining, a documented process for validating the results obtained in the inventories among government and private sector stakeholders at national level is recommended, in order that all have a common understanding of the main mercury sources and priorities. This exercise would include a draft schedule on updates and responsibilities of each stakeholder in the process of elaborating and validating inventories in the future.
Responsible:	BCCC-SRC and national coordinators.
Time-frame:	Immediately
Indicator for	National inventories validated and endorsed by countries relevant ministries and
	key sectoral companies.
Context:	All interviewees stated the usefulness of the use of the UNEP Toolkit for Identification and Quantification of Mercury Releases, but its limitations of being an excel worksheet, the high learning curve and its limited user-friendly features made its use and input of data very complex and tedious. At the same time, differences of terminology and concepts with the Minamata Convention may limit its use and scope in the future. The user guide explains the use of the toolkit assuming that the user had already collected the data, thus there are no guidelines on how to capture these data and assess its quality.
Recommendation 3:	To promote an update/upgrade for this toolkit amongst relevant international institutions, which would include its conversion to a real software with automatic data entries, user friendly operation, and alignment of its concepts with those from Minamata Convention. A user manual providing guidelines on best practices during data collection, templates and tips would also be elaborated.
Responsible:	UN Environment

Time-frame:	August- December 2019	
Indicator for	Revised toolkit.	
compliance:		
Context:	As small and medium-size GEF projects do not require mid-term evaluation, a self-evaluation (Review) was performed by the same individuals who were implementing the project, where important changes to project budget and outcomes were introduced. This would not be considered as a good practice as an independent third party would provide a better assessment to identify root causes of project failures.	
Recommendation 4:	Elaboration of guidelines to assess mid-term reviews for small and medium sized projects should be developed and shared among task managers and national coordinators. These guidelines should include tips for institutional arrangements for PSC conformation, identification of capacities and needs for executing agencies and partners. A list of signs for early shortcomings found in key features/activities missed in project documents, and a summary of key minimum contents for a M&E plan for small and medium size projects should be highlighted.	
Responsible: GEF Coordination Office / Programme Coherence & Assurance Unit		
Time-frame:	August-December 2019	
Indicator for compliance:	New guidelines for small & medium-size projects are developed.	
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Context:	Audit requirements were established under the agreement between UN Environment and BCCC-SCRC: Annual audits until December 31, and the respective reports submitted before June 30 of every year. This meant 5 audit reports should be available for review (2014, 2015, 2016, 2017 and 2018), but only two were made available to the consultant, but it was reported that the rest of the audits are being performed in 2019.	
Recommendation 5:	The project audit requirements should be completed. The project executing agency should commission the required audits and submit them to UN Environment. UN Environment should ensure that the audit requirements are fully met.	
Responsible:	Task Manager, Fund Management Officer, Portfolio Manager	
Time-frame:	August-December 2019	
Indicator for compliance:	Completed audit reports	

## Annex I.Schedule of the evaluation

Milestone	Dates
Desk Review	Early July 2018
Inception Report	Mid July 2018
Telephone interviews, surveys etc.	September 2018-January 2019
Evaluation Mission – Santiago, Buenos Aires, Montevideo	November 6- December 7,2018
and Lima	
PowerPoint/presentation on preliminary findings and	February 13, 2019
recommendations	
Draft report to Evaluation Manager (and Peer Reviewer)	February 18, 2019
Draft Report shared with UN Environment Project Manager	Mid-March 2019
and team	
Draft Report shared with wider group of stakeholders	Late March 2019
Final Report	Late April 2019
Final Report shared with all respondents	Mid-May 2019

ld	Evaluation criteria/sub- criteria	Key guide questions	Key Indicators	Data/information sources and collection procedures (*)		
A. Str	ategic Relevance					
A.1	Alignment to MTS and POW	i) verify if project is in line with UN Environment MTS 2014-2017; ii) with POW 2014-2015; iii) work program of UNEP's Harmful substances and hazardous wastes subprogram; iv) general UNEP's goals for environmental governance, gender policies and green markets.	i) successful relation of project outcomes with UNEP's targets; ii) project targets and outcomes are part of relevant units within UNEP; iii) project outputs and achievements reported as UN Environment contribution to global BD targets.	i) MTS 2014-2017; ii) POW 2014- 2015; iii) work programs of relevant hazardous wastes units; iv) ProDoc; v) UN Environment publications; vi) interviews with TM, BCCC-SCRC, national coordinators and Ministries involved.		
A.2	Alignment to UN Environment /Donor/GEF strategic priorities	i) check if project is in line with GEF-5 Hg strategic area	i) project objective in line with GEF-5 SP for Hg? ii) project objectives in line with GEF priorities and objectives.	i) GEF strategic programming; ii) ProDoc; iii) interviews with TM, BCCC-SCRC, national coordinators and project partners.		
A.3	Relevance to regional, sub- regional and national environmental priorities	i) Check if project is in line with Minamata commitments for pilot countries, ii) if project had contributed to elaboration of new national regulations and institutional strengthening activities to tackle Hg issues in all countries; ii) verify if activities are in line with national wastes management plans; iii) verify if local and national authorities have developed plans to support project outcomes (new regulations, surveillance; cooperation agreements, etc.)	i) successful link between project targets and national priorities and development plans; ii) Hg is included in environmental authorities annual planning	i) government plans; ii) NIPs; iii) regulations on Hg and wastes; iii) ProDoc; iv) interviews with TM, BCCC-SCRC, national coordinators and project partners, and Ministries involved.		
A.4	Complementarit y with existing interventions	i) check if project is not redundant with other Hg initiatives in progress at regional, local and national levels; ii) check if project had coordination with other Hg initiatives.	i) number of relevant Hg and waste management initiatives fully coordinated to avoid redundancy.	i) project documents, ii) ProDoc, iii) interviews with TM, BCCC- SCRC, national coordinators and project partners, and Ministries involved.		
B. Qu	B. Quality of Project Design					
	Baseline analysis determination for mercury in the mining sector and socio- economic situation	i) check if surveys and studies were made during project preparation; ii) check process for determining project logic and goals with key stakeholders (communities, companies, local/national authorities); iii) check if project data is based on earlier/complementary activities such elaboration of inventories at national and regional levels; iv) check if project indicators are SMART	i) baselines and inventories determined according UNEP's standards and methodologies.	i) ProDoc; ii) Hg inventories, iii) reports from studies and consultancies; iv) interviews with TM, BCCC-SCRC, national coordinators and project partners, and Ministries involved.		

ld	Evaluation criteria/sub- criteria	Key guide questions	Key Indicators	Data/information sources and collection procedures (*)
	Project approach	<ul> <li>i) assess project approach to check its relevance, efficiency and its strategy to deliver outputs, outcomes and desired benefits for environment, communities, mining companies, analytical labs and ministries of environment and health.</li> </ul>	i) number of key stakeholders consulted; ii) number of documents on national policies about Hg and wastes consulted.	i) ProDoc; ii) regulations; iii) interviews with TM, BCCC-SCRC, national coordinators and project partners, and Ministries involved.
	Stakeholders' participation	i) check if workshops and consultations to local beneficiaries were made; ii) check if there was involvement of local/ national authorities; iii) if there were specific activities for women and minority groups in pilot sites/countries	i) number of key stakeholders consulted; ii) criteria adopted for choosing beneficiary companies and labs; iii) criteria used to approach local communities and citizen organizations.	i) ProDoc; ii) Hg management plans; iii) interviews with TM, BCCC-SCRC, national coordinators and project partners, and Ministries involved.
C. Na	ture of External Co	ntext		
	Determination of political and socio-economic situation during elaboration of the project	i) check if there was an analysis of type of government and political trends at site/national level that could benefit/prevent project achievements; ii) if institutional strengthening capacities appropriate to improve analytical and technical skills to elaborate sound regulations and Hg management practices in all pilot countries; iii) local/national governance situation in gold mining locations/countries/health sector	i) number of stakeholders consulted; ii) analysis of government and congress election schedules.	i) ProDoc; ii) context reviews; iii) interviews with TM, BCCC-SCRC, national coordinators and project partners, and Ministries involved.
D. Eff	ectiveness			
D.1			i)number of products; ii) number of stakeholders making use of the products.	i) progress reports; ii) PIR; iii) national reports; iv) consultants' reports; v) interviews with TM, BCCC-SCRC, national coordinators and project partners, and Ministries involved.
D.2	Achievement of direct outcomes	i) current progress to desired outcomes; ii) check quality and relevance of outcomes; iii) check if outcomes can be related with health and Hg management improvement at country level; iv) assess if Hg regulations and management approaches are in place and enforced.	i) Number of Hg management approaches; ii) number of regulations elaborated and enforced; iii) number of prioritized sectors.	i) progress reports; ii) PIR; iii) national reports; iv) consultants' reports; v) interviews with TM, BCCC-SCRC, national coordinators and project partners, and Ministries involved.

Id	Evaluation criteria/sub- criteria	Key guide questions	Key Indicators	Data/information sources and collection procedures (*)		
D.3	Likelihood of impact	i) check direct relation of outputs/outcomes achieved with improved Hg management and compliance with Minamata provisions; ii) check if there are alliances with local/national authorities and other local/national/regional stakeholders to ensure replication of outcomes; iii) check if there is cooperation with local/national agencies in charge of enforcement of mercury regulations; iv) check if there are institutional strengthening activities for women, local organizations and communities; v) if there are other complementary or similar activities carried out in the mining and health sectors, assess project contribution to improvement of Hg management, chemical analysis and regulations; vi) key drivers and assumptions.	i) Number of LAC countries implementing Hg management systems using the project experience; ii) amount of Hg containing equipment and wastes managed properly in pilot countries.	i) progress reports; ii) PIR; iii) national reports; iv) consultants' reports; v) interviews; v) policy papers; vi) new regulations; vi) interviews with FMO, Task Manager and BCCC-SCRC.		
E. Fin	ancial Managemen	t				
E.1	Completeness of project financial information	i) check annual work programs and budgets; ii) check if external audits were made; iii) check procedures for sharing and coordinating programming between environmental authorities, mining companies and their associations and UNEP; iv) revise procedures for biddings and check if these are in line with UN Environment requirements; v) check if there was reallocation of project funds; vi) check budgets and expenses for personnel costs versus project activities; vii) revise actual expenditures versus planned.	i) number of audit reports with no critical issues; ii) actual expenditures versus planned in line with project outputs and desired results.	i) audit reports; ii) annual expenditures; iii) budget planning; iv) Interviews with TM, BCCC- SCRC, national coordinators.		
E.2	Communication between finance and project management staff	i) check if there is a standard procedure for planning and budgeting; ii) check if there are regular meetings/communications among UN Environment staff, regional coordination (BCCC-SCRC) staff and national coordinators; iii) ask for BCCC-SCRC and national coordinators' internal procedures for defining budgets and activities.	i) no misunderstandings on project expenditures and products between UN Environment and BCCC-SCRC.	i) audit reports; ii) annual expenditures; iii) budget planning; iv) Interviews with TM, FMO, BCCC-SCRC and national coordinators.		
F. Effi	F. Efficiency					
		i) check if project was implemented efficiently, in-line with UNEP's standards and national norms; iii) check if planned activities/budgets are in line with their actual pace of execution; iv) if there were delays, ask for reasons and actions taken for tackling them; v) ask if management staff considered different modalities regarding time and resource savings when elaborating annual/biannual work programs and budgets; vi) assess	i) products and results obtained according UN Environment practices; ii) number of reallocation of funds and project extensions do not impacted project objectives and outcomes.	i) progress reports; ii) PIR; iii) national reports; iv) consultants' reports; v) PSC meeting minutes; vi) interviews with TM, BCCC-SCRC, national coordinators, project partners and Ministries involved.		

ld	Evaluation criteria/sub- criteria	Key guide questions	Key Indicators	Data/information sources and collection procedures (*)
		the project's planning cycle for BCCC-SCRC and national coordinators for consistency.		
G. Mo	onitoring and Repo			
G.1	Monitoring design and budgeting	i) check if there is a M&E system in place at different project levels (UNEP; BCCC-SCRC global coordination staff; national coordinators); ii) check consistency and relevance of project initial indicators; iii) check if capacity analysis for each company beneficiary was performed before allocating funds and activities; iv) verify if M&E activities are scheduled in AWP and budgets; vi) assess if UN Environment and BCCC-SCRC made a revision of project document and introduce changes where necessary; vii) asses if changes made to ProDoc, logic framework and indicators are explained and documented.	i) number of project's work programs and budgets.	i) AWP; ii) annual budgets; PSC meeting minutes; iii) PIR; iv) progress reports; v) interviews with TM, BCCC-SCRC and national coordinators.
G.2	Monitoring of project implementation	i) check if baseline analysis and indicators for each inventory was defined; ii) check if there are regular records for M&E of activities, outcomes and indicators from BCCC-SCRC and national coordinators; iii) check if project steering committee (PSC) provides strategic guidance, M&E and take corrective actions if necessary; iv) check if decisions taken by the PSC are followed-up for adoption; v) check if there is a reporting system to assess progress on the implementation of PSC decisions; vi) Assess adaptive management for: UNEP, BCCC-SCRC staff coordinating overall project's activities and national implementers (check if there is active monitoring for changes on external/internal site conditions and approaches to tackle them.	i) number of field visits; ii) number of baselines made; iii) number of changes introduced to original activities and products.	i) progress reports; ii) PIR; iii) national reports; iv) consultants' reports; v) PSC meeting minutes; vi) interviews with TM, BCCC-SCRC, national coordinators, project partners and Ministries involved.
G.3	Project reporting	i) check if the M&E system has standard formats and guidelines for reporting progress in each country; ii) check if reporting is complying ProDoc's reporting requirements and schedule; iii) check if reports have sections for distilling lessons learnt; iv) assess if reports contain adaptive management and approaches to tackle internal/external adverse/positive situations.	i) number of reports in compliance with UNEP's requirements.	i) progress reports; ii) PIR; iii) national reports; iv) consultants' reports; v) interviews with TM, BCCC-SCRC and national coordinators

ld	Evaluation criteria/sub- criteria	Key guide questions	Key Indicators	Data/information sources and collection procedures (*)
H. Su	stainability (the ove	erall rating for Sustainability will be the lowest rating am	nong the three sub-categories)	
H.1	Socio-political sustainability	i) assess if there are policies that have positive/negative impacts on project results; ii) assess if local/national authorities adopted activities to sustain project results; ii) assess if national authorities take project experience as reference for future elaboration of policies and regulations; iv) assess if national authorities and protected areas' managers adopted CA models as own policy for PA management.	i) increasing number of mercury inventories in the mining sector; ii) number of mining companies in compliance with new technical standards and regulations.	i) ProDoc; ii) context reviews; iii) interviews with government, communities affected and mining sector
H.2	Financial sustainability	i) assess if beneficiary companies have been provided with proper strengthening capacities for financial management and development of technical skills; ii) assess if mining companies have allocated funds and personnel for mercury management activities; iv) assess if new investments for replacing mercury equipment and wastes are in progress or in the pipeline as a result of project activities; v) verify if waste management and disposal companies have increase their incomes from mercury contracts.	i) number of budgets of mining companies including mercury waste activities.	i) progress reports; ii) PIR; iii) national reports; iv) consultants' reports; v) PSC meeting minutes; vi) Interviews with TM, BCCC-SCRC, national coordinators and project partners.
H.3	Institutional sustainability	i)verify if government agencies have plans including mercury issues; ii) verify if mining companies have plans to continue phase-out of mercury and their wastes.	i) number of staffs in ministries and health dealing with mercury and wastes; ii)	i) progress reports; ii) PIR; iii) national reports; iv) consultants' reports; v) PSC meeting minutes
I. Fac	tors Affecting Perfo	ormance		
1.1	Preparation and readiness	i) assess if UNEP, BCCC-SCRC and national coordinators made a revision of project document and introduce changes where necessary; vii) asses if changes made to ProDoc, logic framework and indicators are explained and documented; ii) asses if capacity analysis for labs, mining companies was made; iii) assess if needs for strengthening capacities for national coordinators and project partners were assessed and plans to tackle these weakness were prepared and implemented.	i) number of adaptive measures taken; ii) number of changes made to the original ProDoc.	i) progress reports; ii) PIR; iii) national reports; iv) consultants' reports; v) PSC meeting minutes; vi) Interviews with TM, BCCC-SCRC, national coordinators and project partners.
1.2	Quality of project management and supervision	i) asses if UNEP, BCCC-SCRC and national coordinators provided quality and timely technical and managerial support to different project stakeholders (mining companies, analytical labs, local/national authorities, mercury maintenance services providers); assess if UN Environment and BCCC-SCRC updated project's risks and mitigation measures.	i) number of products and outcomes reached.	i) progress reports; ii) PIR; iii) national reports; iv) consultants' reports; v) PSC meeting minutes; vi) Interviews with TM, BCCC-SCRC, national coordinators and project partners.

ld	Evaluation criteria/sub- criteria	Key guide questions	Key Indicators	Data/information sources and collection procedures (*)
1.3	Stakeholder participation and cooperation	i) asses if there is a plan for regular and formal consultations to mining companies, maintenance services providers and involved authorities; ii) assess if cooperation opportunities with communities, private sector, national and local authorities have been identified by UNEP, BCCC-SCRC and national coordinators (according the scope of influence of each of these actors); iii) assess if project teams had exchange of experiences with other organizations intervening in the project sites.	i) number of project activities executed and coordinated among different actors involved.	i) progress reports; ii) PIR; iii) national reports; iv) consultants' reports; v) PSC meeting minutes; vi) Interviews with TM, BCCC-SCRC, national coordinators and project partners.
1.4	Responsiveness to human rights and gender equity	i) assess if regional/national executing agencies have been trained in UN's Human Rights approach and how to incorporate this issue into the project; ii) verify if specific activities involving women were planned and implemented; iii) verify if indigenous people rights are considered at mine sites where experiences are designed and implemented.	i) number of specific products/activities/outcomes designed to benefit women and human rights at company and government level; ii) number of measures taken to minimize potential negative effect	i) progress reports; ii) PIR; iii) national reports; iv) consultants' reports; v) PSC meeting minutes; vi) Interviews with TM, BCCC-SCRC, national coordinators, project partners and communities if possible.
1.5	Country ownership and drivennes	i) check ownership of project results for local/national authorities in terms of support that these actors can provide in terms of maintain outcomes' momentum and scale-up; ii) check for new government plans and regulations; iii) check if there is an increased interest of companies and health sector to support regional efforts to improve Hg management practices; iv) check if Hg issues are among of mining companies and hospitals' corporate policies; iv) check if private sector and hospitals consider Hg management as part of its business's sustainability.	i) number of policies and regulations enforced by government authorities; ii) number of Hg management approaches and policies elaborated by mining companies and health sector; ii) funds allocated by government, mining companies and health sector to deal with Hg issues.	i) progress reports; ii) PIR; iii) national reports; iv) consultants' reports; v) PSC meeting minutes; vi) vi) interviews with TM, BCCC-SCRC, national coordinators and project partners, and Ministries involved.
1.6	Communication and public awareness	i) check if there is a public awareness plan to effectively introduce project experience of cooperation as a model for Hg sound management practices and setup of a regulatory network; ii) check if this plan has targeted audiences, messages and objectives (for government, opinion leaders, private sector, education, general public, financing sectors, etc.)	i) number of private companies and hospitals aware and working on Hg issues; ii) number of government/regional agencies working on Hg issues.	i) progress reports; ii) PIR; iii) national reports; iv) consultants' reports; v) PSC meeting minutes; vi) interviews with TM, BCCC-SCRC, national coordinators and project partners and Ministries involved.

(\*): documentation reviewed for all criteria will be complemented with interviews to key stakeholders.

## Annex III.List of stakeholders interviewed

No.	Name	Position	Institution	Country	Role
1	Virginia Santana	Technical staff	BCCC-SCRC	Uruguay	Consultant's counterpart, focal point for this evaluation, provision of information, assistance in mission and agenda elaboration. Stakeholder for interview. Provision of project contact names.
2	Gabriela Medina	Director	BCCC-SCRC	Uruguay	Consultant's counterpart, focal point for this evaluation, provision of information, assistance in mission and agenda elaboration. Stakeholder for interview.
3	Ludovic Bernaudat	Project Manager	UN Env.	Switzerland	Consultant's counterpart, focal point for this evaluation, provision of information, assistance in mission and agenda elaboration.  Stakeholder for interview.
4	Judith Torres	Project responsible	DINAMA	Uruguay	Responsible in DINAMA for Chemical agenda (POPs and mercury projects).
5	Griselda Castagnino	Coordinator of UNDP's mercury project	DINAMA	Uruguay	Project stakeholder
6	Dra. Leila Devia	Director	BCRC	Argentina	Project National Director, Argentina
7	Alejandro Eiroa	National Consultant	UNEP	Argentina	Project National Coordinator and elaboration of the inventory
8	Ana Corallo	Coordinator of MIA project for Argentina	Government Secretariat for Environment and Sustainable Development	Argentina	Coordinates the UNDP project "Minamata Initial Assessment for Argentina"
9	Vilma Morales	Project Coordination in Peru	Ministry of Environment	Peru	National Coordinator
10	Berenice Quiroz	Project national coordinator	Ministry of Environment (MAE)	Ecuador	National Coordinator. No interview yet
11	Anibal Andrade	National Consultant	BCCC-SCRC	Uruguay	Elaboration of national inventory
12	Aracelis Amadori	National Consultant	Arafils S.R.L	Peru	Elaboration of national inventory
13	Elmer Quichiz	Regulations and International Agreements Area	DIGESA-Ministry of Health	Peru	Regulations on Hg and enforcement in the health sector
14	Pamela Lisno		Customs office (SUNAT)	Peru	Opening of tariff codes for mercury products
15	Elizabeth Carreño	Chemical Auditor	Customs office (SUNAT)	Peru	Opening of tariff codes for mercury products and chemical import control.

16	Martha Rico	Technical Secretariat for Illegal Mining Formalization	Ministry of Energy and Mines	Peru	Works with small artisanal mining
17	Angel Murillo	Administration & Financing Manager	National Society of Mining, Petrol & and Energy Companies	Peru	Private mining companies' association
18	Carlos Rodríguez Vigo	Environmental Manager	Buenaventura Mining	Peru	Large mining company producer of copper, gold, zinc, lead and silver

No.	Document	No.	Document
1	10-25- 2015_ID5494_rev_MSP_req.pdf	60	Anexo F. Lista de Actores del Taller de Arranque .pdf
2	Informe DE CAPACITACIÓN ANALITICA.pdf	61	Anexo G. Formato de formularios por categorías.pdf
3	Informe DE CAPACITACIÓN Sitios Contaminados.pdf	62	INFORME PRODUCTO 1 A ACEPTADO DNCA.pdf
4	Informe del Taller Regional de inicio de proyectos de Hg.pdf	63	Informe 2A impreso PDF .pdf
5	Informe Taller final de proyectos de Hg nov 2017.pdf	64	Informe 2B - impreso PDF.pdf
6	PCA Signed.pdf	65	Informe 2C - Inventario - Impreso PDF.pdf
7	Agenda taller cierre Hg borrador.rtf	66	Informe 3AB - Impreso.pdf
8	GEFID5494-PIR17-Hg LAC (1).doc	67	Informe 3C - Impreso.pdf
9	Informe DE CAPACITACIÓN ANALITICA.pdf	68	Producto 3D - Plan riesgos - Impreso.pdf
10	Informe DE CAPACITACIÓN Sitios Contaminados.pdf	69	Producto 4 - Lecciones Aprendidas - Impreso.pdf
11	Informe del Taller Regional de inicio de proyectos de Hg.pdf	70	RESULTADOS INP.pdf
12	Informe Taller final de proyectos de Hg nov 2017.pdf	71	INFORME AGUAS Y SEDIMENTOS SUPLEMENTO.pdf
13	panel inventarios, brechas con el convenio, oportunidades para actividades futuras. PARAGUAY.pdf	72	INFORME AGUAS Y SEDIMENTOS.pdf
14	PANEL sobre inventarios, brechas con el convenio, oportunidades para actividades futuras. ARGENTINA.pdf	73	INFORME PECES Y MACROINVERTEBRADOS.pdf
15	PANEL sobre inventarios, brechas con el convenio, oportunidades para actividades futuras. BOLIVIA.pdf	74	Evaluación Mercurio Portovelo y Ponce Enríquez Informe Final.pdf
16	PANEL sobre inventarios, brechas con el convenio, oportunidades para actividades futuras. CHILE.pdf	75	GEF ID 5494-LAC Mercury Inventory-PIR 29092016- LB.doc
17	PANEL sobre inventarios, brechas con el convenio, oportunidades para actividades futuras. REPÚBLICA DOMINICANA.pdf	76	GEFID5494-PIR17-Hg LAC.doc
18	PANEL SOBRE LEGISLACIÓN Y PLANES NACIONALES. ECUADOR.pdf	77	GRULAC mercury_09.10.2013.doc
19	PANEL SOBRE LEGISLACIÓN Y PLANES NACIONALES. NICARAGUA.pdf	78	PIR 2015. Development of mercury risk management.doc
20	PANEL SOBRE LEGISLACIÓN Y PLANES NACIONALES. REPÚBLICA DOMINICANA.pdf	79	PRC Review sheet for Hg GRULAC_Minutes.doc
21	PANEL SOBRE LEGISLACIÓN Y PLANES NACIONALES. URUGUAY.pdf	80	PRC Review sheet for Hg GRULAC_Minutes_Signed final Minutes.doc

No.	Document	No.	Document
22	Panel SOBRE Minerìa y Sitios contaminados. PERÚ.pdf	81	PRC Review sheet for Hg GRULAC_Minutes_Signed final Minutes_With responses.doc
23	PANEL SOBRE MINERÍA Y SITIOS CONTAMINADOS. CURSO CIEMAT. NICARAGUA.pdf	82	Cremas Aclaradoras-Análisis.pdf
24	PANEL SOBRE MINERÍA Y SITIOS CONTAMINADOS. ECUADOR.pdf	83	Enfoques de gestión de riesgos por Mercurio- Propuesta-docx.pdf
25	PANEL SOBRE Minería y sitios contaminados. PARAGUAY.pdf	84	INFORME -Marco Legal Mercuriopdf
26	PANEL SOBRE MONITOREO DE MERCURIO. ECUADOR.pdf	85	Informe Final Hg_indice VERSION FINAL REV (1).pdf
27	PANEL SOBRE MONITOREO DE MERCURIO. URUGUAY.pdf	86	Inventario Nivel 1.pdf
28	Panel SOBRE Monitoreo y Analisis. PERÚ.pdf	87	Monitoreo de Hg en humanos y ambiente-Revision sistematica.pdf
29	PANEL SOBRE monitoreo y Análisis. Curso en Instituto Jozef Stefan.pdf	88	Recuperacion hidrometalurgica de Au y Hg a partir de relaves.pdf
30	5494-2015Q1 Expenditure report.pdf	89	1295-2018_DIGESA.pdf
31	5494-2015Q2 financial report GRULAC Hg 4E47.pdf	90	554-2012_MINSA.pdf
32	5494-2015Q3 Expenditure Report.pdf	91	NTS-N-096-MINSA-DIGESA-V.01 GESTION Y MANEJO DE RRSSEESSY SMA.pdf
33	5494-2015Q4 mercury project 5494.pdf	92	PRC Review sheet for Hg GRULAC_Minutes_Signed final Minutes.doc
34	5494-2016Q1 expenditure report Hg risks GRULAC.pdf	93	PRC Review sheet for Hg GRULAC_Minutes_Signed final Minutes_With responses.doc
35	5494-2016Q2.pdf	94	APENDICE 2 - REPORTE DE ACTIVIDADES SEMESTRALES ENERO - JUNIO 2016-min.pdf
36	5494-2016Q3.pdf	95	APENDICE 2 - REPORTE DE ACTIVIDADES SEMESTRALES ENERO - JUNIO 2017-min.pdf
37	5494-2016Q4.pdf	96	APENDICE 2 - REPORTE DE ACTIVIDADES SEMESTRALES ENERO - JUNIO 2018-min.pdf
38	5494-2017Q1.pdf	97	APENDICE 2 - REPORTE DE ACTIVIDADES SEMESTRALES JULIO - DICIEMBRE 2016 (1).pdf
39	5494-2017Q2.pdf	98	APENDICE 2 - REPORTE DE ACTIVIDADES SEMESTRALES JULIO - DICIEMBRE 2017 (1).pdf
40	5494-2017Q3.pdf	99	ARGENTINA Hg-Toolkit-IL1-report-año 2014 V23-06- 2017-rec4jul17-com10Aug2017 (1).pdf
41	5494-2017Q4.pdf	100	Informe Legal - Mayo 2017 ARGENTINA.pdf
42	GEFID5494-PIR17-Hg LAC (1).doc	101	Lecciones aprendidas Proyecto Mercurio.pdf
43	Q 2 2018 proyecto GEF 5494 (Latu 701154).xls	102	plan y otros productos del proyecto.pdf
44	Signed Agreement by BCCC (1).pdf	103	PRODUCTO 3.3 tema datos y mediciones.Antecedentes INTI relacionados al mercurio.doc

No.	Document	No.	Document
45	ToC proposal_Hg_Tiina.xlsx	104	180911_Informe final de proyecto riesgos Hg (1).docx
46	APENDICE 2 - REPORTE DE ACTIVIDADES SEMESTRALES ENERO - JUNIO 2016-min.pdf	105	5494-2018Q3.pdf
47	APENDICE 2 - REPORTE DE ACTIVIDADES SEMESTRALES ENERO - JUNIO 2017-min.pdf	106	informe 4 lienamientos hoja de Ruta UY-1.pdf
48	APENDICE 2 - REPORTE DE ACTIVIDADES SEMESTRALES JULIO - DICIEMBRE 2017 (1).pdf	107	Informe final del proyecto.docx
49	ARGENTINA Hg-Toolkit-IL1-report- año 2014 V23-06-2017-rec4jul17- com10Aug2017 (1).pdf	108	Q 3 2018 proyecto GEF 5494 (Latu 701154).xls
50	Informe Legal - Mayo 2017 ARGENTINA.pdf	109	apÉndice_5informe_de_co-financiamiento- ecuador.pdf
51	plan y otros productos del proyecto.pdf	110	Contrapartida MINAM Proyecto Mercurio LATU.pdf
52	PRODUCTO 3.3 tema datos y mediciones.Antecedentes INTI relacionados al mercurio.doc	111	Financial_tables_Hg_regional.xlsx
53	APENDICE 4 INFORME FINAL.pdf	112	Nota Co financiamiento.pdf
54	Informe 3C - Monitoreos Ambientales en la Zona Minera - Ene 03, 2018 (1).pdf	113	GEF_5_programming_doc.pdf
55	A1. Mapa geologico nacional.pdf	114	Hg-Toolkit-Inventory Level 1-Calculation-Spreadsheet- January2017.xlsx
56	A2. Mapa metalogenico nacional.pdf	115	mercuryexposure_risk_assessment.pdf
57	A3. Mapa de Indicios Minerales Metálicos.pdf	116	MIA_GEF_review.pdf
58	A4. Mapa de Indicios No Metálicos.pdf	117	MIA_LAC_2014.pdf
59	Anexo E. Actores por Categorías.pdf	118	Plan_Accion_Red_Quimicos_2019_2020_UN_env.docx
		119	Study on mercury sources and emissions_UNEP_2010.pdf
		120	undp-ee-wastemgt-Minamata-Initial-Assessment- Report-Guidance-Feb2017.pdf

# Preliminary findings from the Mercury Regional Project TE

Jorge Leiva February, 13, 2019

Note: click on the ppt to start the entire presentation

Jorge Leiva is a Chemical Engineer from the University of Santiago, Chile; MSc. in Chemical Engineering from Katholieke Unversiteit Leuven (KUL), Belgium and he has partial PhD studies in Bioengineering Sciences at KUL. With 23 years of professional experience in the field of environment, he has evaluated 38 projects funded by UNDP, GEF, UN Environment and IDB.

As Chile ozone officer and focal point for Montreal Protocol activities at the Chile National Commission for the Environment (CONAMA, 1994-2004, currently Ministry of Environment), he dealt with all aspects of project/programs' cycle, including identification, preparation, implementation, financing, monitoring, evaluation and reporting.

He also participated as expert in 3 IPCC special reports (2000, 2005, 5th assessment report) and he was the co-chair of the OEWG of the Parties to the MP (2003) and member of several technical and contact groups related with MP issues.

Since 2006, he performs evaluations (midterm and final) of several UNDP/GEF projects, including biodiversity conservation in terrestrial, mountain and marine ecosystems, protected areas (e.g., Financial Sustainability for the National System of Protected Areas (SNAP) in Ecuador), climate change (UNDP/GEF México's Green Plan); energy efficiency and biomass conversion.

Regarding issues related with chemical substances, he carried-out 5 evaluations of PCB projects in Uruguay, Costa Rica, Argentina, Mexico y Colombia (UNDP), verification of 4 ozone national action plans (UN Environment) and 2 mercury projects (UNDP, UN Environment).

He conducts these evaluations according the specific methodologies developed by each agency, such as IDB's "Environment and Safeguards Compliance Policy", which includes design and implementation phases.

He studied and lived in Belgium for almost 6 years, so he used to work in multicultural environments, and thus has a deep understanding of cultural and motivations of government officials and private sector partners in different countries.

#### **TERMS OF REFERENCE**

Terminal Evaluation of the UN Environment/Global Environment Facility project "Development of mercury risk management approaches in Latin America"

#### **Section 1: PROJECT BACKGROUND AND OVERVIEW**

## **Project General Information**

Table 1. Project summary<sup>33</sup>

GEF Project ID:	5494		
Implementing Agency:	UN Environment	Executing Agency:	Basel Convention Coordinating Centre and Stockholm Convention Regional Centre for Latin America and the Caribbean Region (BCCC-SCRC) hosted by Uruguay
Sub-programme:	Chemicals and Waste (Harmful Substances and Hazardous Wastes)	Expected Accomplishment(s):	
UN Environment approval date:	23/03/2014	Programme of Work Output(s):	
GEF approval date:	18/11/2013	Project type:	MSP
GEF Operational Programme #:		Focal Area(s):	Persistent Organic Pollutants/Chemicals
		GEF Strategic Priority:	Strategic Objective 3: Pilot Sound Chemicals Management and Mercury Reduction
Expected start date:		Actual start date:	9/06/2014
Planned completion date:	26/05/2017	Actual completion date:	31/12/2017
Planned project budget at approval:	\$ 3,810,434	Actual total expenditures reported as 31 Dec 17:	718,838 (only GEF)
GEF grant allocation:	\$ 916,000	GEF grant expenditures reported as of 31 Dec 2017:	\$ 718,838
Project Preparation Grant - GEF financing:	N/A	Project Preparation Grant - co- financing:	N/A
Expected Medium- Size Project co- financing:	\$1,980,400	Secured Medium- Size Project co- financing:	

<sup>33</sup> PIR 2015 unless other

First disbursement:	09 June 2014	Date of financial closure:	30 Jun 18	
No. of revisions:	1	Date of last revision:	09/02/2017	
No. of Steering Committee meetings:	2	Date of last/next Steering Committee meeting:	<b>Last</b> : 18/10/2016	Next:
Mid-term Review/ Evaluation (planned date):	9/12/2015	Mid-term Review/ Evaluation (actual date):		
Terminal Evaluation (planned date):		Terminal Evaluation (actual date):		
Coverage - Countries:	I Micarantia Perti and		Regional – Latin Am the Caribbean	erica and
Dates of previous project phases:	N/A	Status of future project phases:	Tbd.	

#### **Project rationale**

- 431. Mercury pollution is a serious concern in the Latin American and Caribbean Region. The 2013 UN Environment Global Mercury Assessment indicated that the Region account for 15% of the global emissions of mercury to the atmosphere while mercury use in Artisanal and Small-scale Gold Mining (ASGM) accounts for 37% of the total emission of mercury from anthropogenic sources globally. At the time of the project design ASGM was still widely practiced in Latin American countries but its real magnitude has not been determined in detail. The availability of data is reported as a major challenge to design adequate strategies for mercury reduction. For example, dental amalgam and waste incineration may be significant contributors of mercury releases in the region but are not accounted in the UN Environment Global Mercury Assessment and are lacking from national records of mercury releases.
- 432. Argentina, Ecuador, Nicaragua, Peru and Uruguay, developed with UN Environment support this Medium Size Project to generate data to inform and pilot-test innovations in risk management approaches to reduce human and environmental exposure to mercury.

#### **Project objectives and components**

433. The Project Goal is stated as "to improve the sustainable development of the participating countries through reduced risk to human health and the environment from mercury releases.". The project was structured along four components, each captured by an outcome statement as presented in table 2 below.

**Table 2. Project Results and Indicators** 

Results	Indicators
Objective To strengthen the capacity of participating LAC countries (Argentina, Ecuador, Peru, Nicaragua and Uruguay) to identify mercury sources and the priority actions to be undertaken	Mercury inventories developed for five participating countries.  National mercury risk management approaches with agreed priorities developed for five participating countries.
Outcome 1: Information needs identified in participating countries	1.1 Workplan, budget and M&E plan endorsed by all participating countries     1.2 Existing materials and information on mercury identified and utilized

Outcome 2: Comprehensive information on mercury sources and releases enable a better understanding of mercury risks to human health and the environment for participating countries	2.1 Level 1 and Level 2 mercury inventories for each participating country, identifying key sectors
Outcome 3: Enhanced understanding of mercury priority sources and capacity for mercury management through the development/ identification of national mercury risk management approaches including the identification of management gaps and needs	3.1 Number of mercury priorities set in each participating country. 3.2 Number of assessments on regulatory aspects and means for mercury emissions control 3.3 Number of data sets collected and analysed greatly contribute to the development of national risk management approaches 3.4 Number of prioritized national mercury risk management approaches for mercury reduction
Outcome 4: Lessons learned available and shared regionally allow better practices in future projects	4.1 Number of regional key sector identifying mercury management gaps 4.2 Final project report on lessons learned and main outputs (inventories, national mercury risk management approaches) endorsed and diffused 4.3 Number of Steering Committee Meeting reports available as part of the M&E plan

#### **Executing Arrangements**

- 434. The project was implemented by UN Environment's Chemicals Branch within the Economy Division and executed by the Basel Convention Coordinating Centre and Stockholm Convention Regional Centre for Latin America and the Caribbean Region (BCCC-SCRC) hosted by Uruguay (Uruguay Centre).
- 435. The project was implemented in closer coordination with a similar intervention also executed by the Basel Convention Coordinating Centre and Stockholm Convention Regional Centre for Latin America and the Caribbean Region (BCCC-SCRC) hosted by Uruguay (Uruguay Centre) in Chile, Bolivia, Paraguay and Dominican Republic.
- 436. UN Environment, as Implementing Agency (IA), was responsible for the overall project supervision and provided administrative support to the Executing Agency. Additionally, the Science Team of UN Environment DTIE Chemicals provided technical support to the project through the implementation of the laboratory proficiency survey and assessment. UN Environment Regional Office in Panama facilitated the dialogue with National Authorities in the Region and in leveraging project results to strengthen the national and regional chemicals management agenda.
- 437. The Uruguay Centre, as Executing Agency (EA) established a project team responsible for the delivery of project outputs and on managing the intervention on a day-to-day basis. In each participating country a National Project Team (NPT) coordinated project activities.
- 438. A Project Steering Committee (PSC), formed by representatives of the EA and IA, bilateral donors, interested organizations and national focal points from participating countries provided strategic direction to the project to guarantee the achievement of larger and more sustainable results. Figure 1 below shows the implementation arrangements at design.

Basel Centre for Regional Cooperation
Executing Agency

Argentina

Ecuador

Nicaragua

Project Steering Group
(UNEP, donors)

UNEP

Implementing Agency

Project Steering Group
(UNEP, donors)

Figure 1. Implementation Arrangements

Source: project document

## **Project Cost and Financing**

439. The intervention was a Medium Size Project with total expected cost of 2,392,461.20. GEF funding for the project was 818,300 USD. Table 3 below summarizes the over project cost and funding sources at design.

Table 3. Project costs at design

Project costs at design	USD			
Cost to the GEF Trust Fun	916,000			
	Government of Nicaragua	60,000		
	Government of Peru	10,000		
Co-financing in cash	Government of Uruguay	133,400		
	Sub-total in-cash co-financing	203,400		
	Government of Argentina	300,000		
	Government of Ecuador	312,300		
Co-financing in kind	Government of Nicaragua	240,000		
	Government of Peru	390,000		
	Government of Uruguay	534,600		
	UNEP DTIE (Chemicals Branch)	914,134		
	Sub-total in-kind co-financing	2,691,034		
Total Co-financing	2,894,434			
TOTAL 3,8°				

#### Implementation Issues

- 440. The Project Implementation Reports (PIRs) indicated that the project experienced a series of delays, some anticipated already during the inception workshop, such as changes of countries authorities and priorities, and workload of project focal points having other duties on top of project's responsibilities. In line with the above, the Government of Nicaragua decided in March 2016 to withdraw from the project due to the lack of funds to meet their co-financing commitments and opted instead to develop an independent and more ambitious project to be submitted to the GEF during the first semester of 2018. Another major challenge reported is linked to the different levels of capacity found in the five participating countries, requiring the development of tailor-made responses to fit specific needs. A Project Mid-Term workshop was held in Montevideo in October 2016 resulting in a revision of the work plan and the budget.
- 441. The project was implemented in closer coordination with the project "Development of Minamata Initial Assessment in Latin America and the Caribbean" also executed by the Basel Convention Coordinating Centre and Stockholm Convention Regional Centre for Latin America and the Caribbean Region (BCCC-SCRC) hosted by Uruguay (Uruguay Centre) in Chile, Bolivia, Paraguay and Dominican Republic. The terminal review of this complementary project started in April 2018 and should be completed by September 2018.
- 442. The complexity of the intervention is captured in the latest PIR (July 01, 2016- June 30, 2017) rating 12 out of 17 factors as medium risk and only five as low risk.

#### Section 2. OBJECTIVE AND SCOPE OF THE EVALUATION

#### **Key Evaluation principles**

- 443. Evaluation findings and judgements should be based on **sound evidence and analysis**, clearly documented in the evaluation report. Information will be triangulated (i.e. verified from different sources) as far as possible, and when verification is not possible, the single source will be mentioned (whilst anonymity is still protected). Analysis leading to evaluative judgements should always be clearly spelled out.
- 444. **The "Why?" Question.** As this is a terminal evaluation and a follow-up project is likely [or similar interventions are envisaged for the future], particular attention should be given to learning from the experience. Therefore, the "*Why?*" question should be at the front of the consultants' minds all through the evaluation exercise and is supported by the use of a theory of change approach. This means that the consultants need to go beyond the assessment of "*what*" the project performance was, and make a serious effort to provide a deeper understanding of "*why*" the performance was as it was. This should provide the basis for the lessons that can be drawn from the project.
- 445. **Baselines and counterfactuals**. In attempting to attribute any outcomes and impacts to the project intervention, the evaluators should consider the difference between *what has happened with*, *and what would have happened without*, *the project*. This implies that there should be consideration of the baseline conditions, trends and counterfactuals in relation to the intended project outcomes and impacts. It also means that there should be plausible evidence to attribute such outcomes and impacts to the actions of the project. Sometimes, adequate information on baseline conditions, trends or counterfactuals is lacking. In such cases this should be clearly highlighted by the evaluators, along with any simplifying assumptions that were taken to enable the evaluator to make informed judgements about project performance.
- 446. **Communicating evaluation results.** A key aim of the evaluation is to encourage reflection and learning by UN Environment staff and key project stakeholders. The consultant should consider how reflection and learning can be promoted, both through the evaluation process and in the communication of evaluation findings and key lessons. Clear and concise writing is required on all evaluation deliverables. Draft and final versions of the main evaluation report will be shared with key stakeholders by the Evaluation Manager. There may, however, be several intended audiences, each

with different interests and needs regarding the report. The Evaluation Manager will plan with the consultant(s) which audiences to target and the easiest and clearest way to communicate the key evaluation findings and lessons to them. This may include some or all of the following; a webinar, conference calls with relevant stakeholders, the preparation of an evaluation brief or interactive presentation.

#### **Objective of the Evaluation**

447. In line with the UN Environment Evaluation Policy<sup>34</sup> and the UN Environment Programme Manual<sup>35</sup>, the Terminal Evaluation (TE) is undertaken at completion of the project to assess project performance (in terms of relevance, effectiveness and efficiency), and determine outcomes and impacts (actual and potential) stemming from the project, including their sustainability. The evaluation has two primary purposes: (i) to provide evidence of results to meet accountability requirements, and (ii) to promote operational improvement, learning and knowledge sharing through results and lessons learned among UN Environment and Basel Convention Coordinating Centre, Stockholm Convention Regional Centre, for Latin America and the Caribbean Region (BCCC-SCRC) hosted by Uruguay. Therefore, the evaluation will identify lessons of operational relevance for future project formulation and implementation.

#### **Key Strategic Questions**

448. In addition to the evaluation criteria outlined in Section 10 below, the evaluation will address the **strategic questions** listed below. These are questions of interest to UN Environment and to which the project is believed to be able to make a substantive contribution:

- (a) Under effectiveness, to what extend and how did the project respond to changes in priorities and authorities in the project countries while providing appropriate guidance to face national challenges?
- (b) To what extent was the mix of knowledge and expertise made available by the project appropriate to steer the intervention in Argentina, Ecuador, Nicaragua, Peru and Uruquay?
- (c) To what extent and how did the data collected and made available by the project contribute to the development of action plans to reduce risks to human health and the environment from mercury releases?
- (d) To what extent and how did the cooperation with the project "Development of Minamata Initial Assessment in LAC" increased the knowledge base of the intervention to inform the development of feasible action plans in the project countries?

#### **Evaluation Criteria**

449. All evaluation criteria will be rated on a six-point scale. Sections A-I below, outline the scope of the criteria and a link to a table for recording the ratings is provided in Annex 1). A weightings table will be provided in excel format (link provided in Annex 1) to support the determination of an overall project rating. The set of evaluation criteria are grouped in nine categories: (A) Strategic Relevance; (B) Quality of Project Design; (C) Nature of External Context; (D) Effectiveness, which comprises assessments of the delivery of outputs, achievement of outcomes and likelihood of impact; (E) Financial Management; (F) Efficiency; (G) Monitoring and Reporting; (H) Sustainability; and (I) Factors Affecting Project Performance. The evaluation consultants can propose other evaluation criteria as deemed appropriate.

#### A. Strategic Relevance

450. The evaluation will assess, in line with the OECD/DAC definition of relevance, 'the extent to which the activity is suited to the priorities and policies of the target group, recipient and donor'. The

<sup>35</sup> http://www.unep.org/QAS/Documents/UNEP Programme Manual May 2013.pdf . This manual is under revision.

<sup>34</sup> http://www.unep.org/eou/StandardsPolicyandPractices/UNEPEvaluationPolicy/tabid/3050/language/en-US/Default.aspx

evaluation will include an assessment of the project's relevance in relation to UN Environment's mandate and its alignment with UN Environment's policies and strategies at the time of project approval. Under strategic relevance an assessment of the complementarity of the project with other interventions addressing the needs of the same target groups will be made. This criterion comprises four elements:

- i. Alignment to the UN Environment Medium Term Strategy<sup>36</sup> (MTS) and Programme of Work (POW)
- 451. The evaluation should assess the project's alignment with the MTS and POW under which the project was approved and include, in its narrative, reflections on the scale and scope of any contributions made to the planned results reflected in the relevant MTS and POW.
  - ii. Alignment to UN Environment / Donor/GEF Strategic Priorities
- 452. Donor, including GEF, strategic priorities will vary across interventions. UN Environment strategic priorities include the Bali Strategic Plan for Technology Support and Capacity Building37 (BSP) and South-South Cooperation (S-SC). The BSP relates to the capacity of governments to: comply with international agreements and obligations at the national level; promote, facilitate and finance environmentally sound technologies and to strengthen frameworks for developing coherent international environmental policies. S-SC is regarded as the exchange of resources, technology and knowledge between developing countries. GEF priorities are specified in published programming priorities and focal area strategies.
  - iii. Relevance to Regional, Sub-regional and National Environmental Priorities
- 453. The evaluation will assess the extent to which the intervention is suited, or responding to, the stated environmental concerns and needs of the countries, sub-regions or regions where it is being implemented. Examples may include: national or sub-national development plans, poverty reduction strategies or national plans to comply with relevant Multilateral Environmental Agreements or regional agreements etc.
  - iv. Complementarity with Existing Interventions
- 454. An assessment will be made of how well the project, either at design stage or during the project mobilization, took account of ongoing and planned initiatives (under the same sub-programme, other UN Environment sub-programmes, or being implemented by other agencies) that address similar needs of the same target groups. The evaluation will consider if the project team, in collaboration with Regional Offices and Sub-Programme Coordinators, made efforts to ensure their own intervention was complementary to other interventions, optimized any synergies and avoided duplication of effort. Examples may include UN Development Assistance Frameworks or One UN programming. Linkages with other interventions should be described and instances where UN Environment's comparative advantage has been particularly well applied should be highlighted.

Factors affecting this criterion may include:

- Stakeholders' participation and cooperation
- Responsiveness to human rights and gender equity
- Country ownership and driven-ness

#### B. Quality of Project Design

455. The quality of project design is assessed using an agreed template during the evaluation inception phase, ratings are attributed to identified criteria and an overall Project Design Quality rating

<sup>&</sup>lt;sup>36</sup> UN Environment's Medium-Term Strategy (MTS) is a document that guides UN Environment's programme planning over a four-year period. It identifies UN Environment's thematic priorities, known as Sub-programmes (SP), and sets out the desired outcomes, known as Expected Accomplishments (EAs), of the Sub-programmes.

<sup>37</sup> http://www.unep.org/GC/GC23/documents/GC23-6-add-1.pdf

is established (www.unep.org/evaluation). This overall Project Design Quality rating is entered in the final evaluation ratings table as item B. In the Main Evaluation Report a summary of the project's strengths and weaknesses at design stage is included, while the complete Project Design Quality template is annexed in the Inception Report.

Factors affecting this criterion may include (at the design stage):

- Stakeholders participation and cooperation
- Responsiveness to human rights and gender equity

#### C. Nature of External Context

456. At evaluation inception stage a rating is established for the project's external operating context (considering the prevalence of conflict, natural disasters and political upheaval). This rating is entered in the final evaluation ratings table as item C. Where a project has been rated as facing either an Unfavourable or Highly Unfavourable external operating context, and/or a negative external event has occurred during project implementation, the ratings for Effectiveness, Efficiency and/or Sustainability may be increased at the discretion of the Evaluation Consultant and Evaluation Manager together. A justification for such an increase must be given.

#### D. Effectiveness

#### i. Delivery of Outputs

457. The evaluation will assess the project's success in producing the programmed outputs (products, capital goods and services resulting from the intervention) and achieving milestones as per the project design document (ProDoc). Any formal modifications/revisions made during project implementation will be considered part of the project design. Where the project outputs are inappropriately or inaccurately stated in the ProDoc, reformulations may be necessary in the reconstruction of the TOC. In such cases a table should be provided showing the original and the reformulation of the outputs for transparency. The delivery of outputs will be assessed in terms of both quantity and quality, and the assessment will consider their ownership by, and usefulness to, intended beneficiaries and the timeliness of their delivery. The evaluation will briefly explain the reasons behind the success or shortcomings of the project in delivering its programmed outputs and meeting expected quality standards.

Factors affecting this criterion may include:

- Preparation and readiness
- •Quality of project management and supervision38

#### ii. Achievement of Direct Outcomes

458. The achievement of direct outcomes (short and medium-term effects of the intervention's outputs; a change of behaviour resulting from the use/application of outputs, which is not under the direct control of the intervention's direct actors) is assessed as performance against the direct outcomes as defined in the reconstructed39 Theory of Change. These are the first-level outcomes expected to be achieved as an immediate result of project outputs. As in 1, above, a table can be used where substantive amendments to the formulation of direct outcomes is necessary. The

<sup>&</sup>lt;sup>38</sup> In some cases 'project management and supervision' will refer to the supervision and guidance provided by UN Environment to implementing partners and national governments while in others, specifically for GEF funded projects, it will refer to the project management performance of the executing agency and the technical backstopping provided by UN Environment.

<sup>&</sup>lt;sup>39</sup> UN Environment staff are currently required to submit a Theory of Change with all submitted project designs. The level of 'reconstruction' needed during an evaluation will depend on the quality of this initial TOC, the time that has lapsed between project design and implementation (which may be related to securing and disbursing funds) and the level of any changes made to the project design. In the case of projects pre-dating 2013 the intervention logic is often represented in a logical framework and a TOC will need to be constructed in the inception stage of the evaluation.

evaluation should report evidence of attribution between UN Environment's intervention and the direct outcomes. In cases of normative work or where several actors are collaborating to achieve common outcomes, evidence of the nature and magnitude of UN Environment's 'substantive contribution' should be included and/or 'credible association' established between project efforts and the direct outcomes realised.

Factors affecting this criterion may include:

- Quality of project management and supervision
- Stakeholders' participation and cooperation
- Responsiveness to human rights and gender equity
- Communication and public awareness

#### i. Likelihood of Impact

- 459. Based on the articulation of longer-term effects in the reconstructed TOC (i.e. from direct outcomes, via intermediate states, to impact), the evaluation will assess the likelihood of the intended, positive impacts becoming a reality. Project objectives or goals should be incorporated in the TOC, possibly as intermediate states or long-term impacts. The Evaluation Office's approach to the use of TOC in project evaluations is outlined in a guidance note available on the EOU website, web.unep.org/evaluation and is supported by an excel-based flow chart, 'Likelihood of Impact Assessment Decision Tree'. Essentially the approach follows a 'likelihood tree' from direct outcomes to impacts, taking account of whether the assumptions and drivers identified in the reconstructed TOC held. Any unintended positive effects should also be identified and their causal linkages to the intended impact described.
- 460. The evaluation will also consider the likelihood that the intervention may lead, or contribute to, <u>unintended negative effects</u>. Some of these potential negative effects may have been identified in the project design as risks or as part of the analysis of Environmental, Social and Economic Safeguards.<sup>40</sup>
- 461. The evaluation will consider the extent to which the project has played a <u>catalytic role or has promoted scaling up and/or replication</u><sup>41</sup> as part of its Theory of Change and as factors that are likely to contribute to longer term impact.
- 462. Ultimately UN Environment and all its partners aim to bring about benefits to the environment and human well-being. Few projects are likely to have impact statements that reflect such long-term or broad-based changes. However, the evaluation will assess the likelihood of the project to make a substantive contribution to the high-level changes represented by UN Environment's Expected Accomplishments, the Sustainable Development Goals<sup>42</sup> and/or the high-level results prioritised by the funding partner.

Factors affecting this criterion may include:

- Quality of Project Management and Supervision (including adaptive management)
- Stakeholders participation and cooperation
- Responsiveness to human rights and gender equity
- Country ownership and driven-ness
- Communication and public awareness

<sup>&</sup>lt;sup>40</sup> Further information on Environmental, Social and Economic Safeguards (ESES) can be found at http://www.unep.org/about/eses

<sup>&</sup>lt;sup>41</sup> Scaling up refers to approaches being adopted on a much larger scale, but in a very similar context. Scaling up is often the longer term objective of pilot initiatives. *Replication* refers to approaches being repeated or lessons being explicitly applied in new/different contexts e.g. other geographic areas, different target group etc. Effective replication typically requires some form of revision or adaptation to the new context. It is possible to replicate at either the same or a different scale.

#### **E. Financial Management**

463. Financial management will be assessed under two themes: *completeness* of financial information and *communication* between financial and project management staff. The evaluation will establish the actual spend across the life of the project of funds secured from all donors. This expenditure will be reported, where possible, at output level and will be compared with the approved budget. The evaluation will assess the level of communication between the Project/Task Manager and the Fund Management Officer as it relates to the effective delivery of the planned project and the needs of a responsive, adaptive management approach. The evaluation will verify the application of proper financial management standards and adherence to UN Environment's financial management policies. Any financial management issues that have affected the timely delivery of the project or the quality of its performance will be highlighted.

Factors affecting this criterion may include:

- Preparation and readiness
- Quality of project management and supervision

#### F. Efficiency

464. In keeping with the OECD/DAC definition of efficiency the evaluation will assess the extent to which the project delivered maximum results from the given resources. This will include an assessment of the cost-effectiveness and timeliness of project execution. Focussing on the translation of inputs into outputs, cost-effectiveness is the extent to which an intervention has achieved, or is expected to achieve, its results at the lowest possible cost. Timeliness refers to whether planned activities were delivered according to expected timeframes as well as whether events were sequenced efficiently. The evaluation will also assess to what extent any project extension could have been avoided through stronger project management and identify any negative impacts caused by project delays or extensions. The evaluation will describe any cost or time-saving measures put in place to maximise results within the secured budget and agreed project timeframe and consider whether the project was implemented in the most efficient way compared to alternative interventions or approaches.

465. The evaluation will give special attention to efforts by the project teams to make use of/build upon pre-existing institutions, agreements and partnerships, data sources, synergies and complementarities with other initiatives, programmes and projects etc. to increase project efficiency. The evaluation will also consider the extent to which the management of the project minimised UN Environment's environmental footprint.

466. The factors underpinning the need for any project extensions will also be explored and discussed. As management or project support costs cannot be increased in cases of 'no cost extensions', such extensions represent an increase in unstated costs to implementing parties.

Factors affecting this criterion may include:

- Preparation and readiness (e.g. timeliness)
- Quality of project management and supervision
- Stakeholders participation and cooperation

#### G. Monitoring and Reporting

467. The evaluation will assess monitoring and reporting across three sub-categories: monitoring design and budgeting, monitoring implementation and project reporting.

#### i. Monitoring Design and Budgeting

468. Each project should be supported by a sound monitoring plan that is designed to track progress against SMART<sup>43</sup> indicators towards the delivery of the project outputs and achievement of direct outcomes, including at a level disaggregated by gender, vulnerability or marginalisation. The evaluation will assess the quality of the design of the monitoring plan as well as the funds allocated for its implementation. The adequacy of resources for mid-term and terminal evaluation/review should be discussed if applicable.

#### ii. Monitoring of Project Implementation

469. The evaluation will assess whether the monitoring system was operational and facilitated the timely tracking of results and progress towards projects objectives throughout the project implementation period. This should include monitoring the representation and participation of disaggregated groups in project activities. It will also consider how information generated by the monitoring system during project implementation was used to adapt and improve project execution, achievement of outcomes and ensure sustainability. The evaluation should confirm that funds allocated for monitoring were used to support this activity.

#### iii. Project Reporting

470. UN Environment has a centralised Project Information Management System (PIMS) in which project managers upload six-monthly status reports against agreed project milestones. This information will be provided to the Evaluation Consultant(s) by the Evaluation Manager. Some projects have additional requirements to report regularly to funding partners, which will be supplied by the project team (e.g. the Project Implementation Reviews and Tracking Tool for GEF-funded projects). The evaluation will assess the extent to which both UN Environment and donor reporting commitments have been fulfilled.

Factors affecting this criterion may include:

- Quality of project management and supervision
- Responsiveness to human rights and gender equity (e.g. disaggregated indicators and data)

#### H. Sustainability

471. Sustainability is understood as the probability of direct outcomes being maintained and developed after the close of the intervention. The evaluation will identify and assess the key conditions or factors that are likely to undermine or contribute to the persistence of achieved direct outcomes (i.e. 'assumptions' and 'drivers'). Some factors of sustainability may be embedded in the project design and implementation approaches while others may be contextual circumstances or conditions that evolve over the life of the intervention. Where applicable an <u>assessment of biophysical factors</u> that may affect the sustainability of direct outcomes may also be included.

#### i. Socio-political Sustainability

472. The evaluation will assess the extent to which social or political factors support the continuation and further development of project direct outcomes. It will consider the level of ownership, interest and commitment among government and other stakeholders to take the project achievements forwards. In particular the evaluation will consider whether individual capacity development efforts are likely to be sustained.

#### ii. Financial Sustainability

473. Some direct outcomes, once achieved, do not require further financial inputs, e.g. the adoption of a revised policy. However, in order to derive a benefit from this outcome further management action may still be needed e.g. to undertake actions to enforce the policy. Other direct outcomes may be dependent on a continuous flow of action that needs to be resourced for them to be maintained, e.g. continuation of a new resource management approach. The evaluation will assess the extent to which

<sup>&</sup>lt;sup>43</sup> SMART refers to indicators that are specific, measurable, assignable, realistic and time-specific.

project outcomes are dependent on future funding for the benefits they bring to be sustained. Secured future funding is only relevant to financial sustainability where the direct outcomes of a project have been extended into a future project phase. <u>Even where future funding has been secured</u>, the question still remains as to whether the project outcomes are financially sustainable.

#### iii. Institutional Sustainability

474. The evaluation will assess the extent to which the sustainability of project outcomes (especially those relating to policies and laws) is dependent on issues relating to institutional frameworks and governance. It will consider whether institutional achievements such as governance structures and processes, policies, sub-regional agreements, legal and accountability frameworks etc. are robust enough to continue delivering the benefits associated with the project outcomes after project closure. In particular, the evaluation will consider whether institutional capacity development efforts are likely to be sustained.

Factors affecting this criterion may include:

- Stakeholders participation and cooperation
- Responsiveness to human rights and gender equity (e.g. where interventions are not inclusive, their sustainability may be undermined)
- Communication and public awareness
- Country ownership and driven-ness

## **Factors and Processes Affecting Project Performance**

(These factors are rated in the ratings table, but are discussed within the Main Evaluation Report as cross-cutting themes as appropriate under the other evaluation criteria, above)

#### i. Preparation and Readiness

475. This criterion focuses on the inception or mobilisation stage of the project (i.e. the time between project approval and first disbursement). The evaluation will assess whether appropriate measures were taken to either address weaknesses in the project design or respond to changes that took place between project approval, the securing of funds and project mobilisation. In particular the evaluation will consider the nature and quality of engagement with stakeholder groups by the project team, the confirmation of partner capacity and development of partnership agreements as well as initial staffing and financing arrangements. (*Project preparation is included in the template for the assessment of Project Design Quality*).

#### ii. Quality of Project Management and Supervision

- 476. In some cases 'project management and supervision' will refer to the supervision and guidance provided by UN Environment to implementing partners and national governments while in others, specifically for GEF funded projects, it will refer to the project management performance of the executing agency and the technical backstopping and supervision provided by UN Environment.
- 477. The evaluation will assess the effectiveness of project management with regard to: providing leadership towards achieving the planned outcomes; managing team structures; maintaining productive partner relationships (including Steering Groups etc.); communication and collaboration with UN Environment colleagues; risk management; use of problem-solving; project adaptation and overall project execution. Evidence of adaptive management should be highlighted.

#### iii. Stakeholder Participation and Cooperation

478. Here the term 'stakeholder' should be considered in a broad sense, encompassing all project partners, duty bearers with a role in delivering project outputs and target users of project outputs and any other collaborating agents external to UN Environment. The assessment will consider the quality and effectiveness of all forms of communication and consultation with stakeholders throughout the project life and the support given to maximise collaboration and coherence between various

stakeholders, including sharing plans, pooling resources and exchanging learning and expertise. The inclusion and participation of all differentiated groups, including gender groups should be considered.

#### iv. Responsiveness to Human Rights and Gender Equity

- 479. The evaluation will ascertain to what extent the project has applied the UN Common Understanding on the human rights-based approach (HRBA) and the UN Declaration on the Rights of Indigenous People. Within this human rights context the evaluation will assess to what extent the intervention adheres to UN Environment's Policy and Strategy for Gender Equality and the Environment.
- 480. In particular the evaluation will consider to what extent project design, implementation and monitoring have taken into consideration: (i) possible gender inequalities in access to, and the control over, natural resources; (ii) specific vulnerabilities of women and children to environmental degradation or disasters; and (iii) the role of women in mitigating or adapting to environmental changes and engaging in environmental protection and rehabilitation.

#### v. Country Ownership and Driven-ness

481. The evaluation will assess the quality and degree of engagement of government / public sector agencies in the project. While there is some overlap between Country Ownership and Institutional Sustainability, this criterion focuses primarily on the forward momentum of the intended projects results, i.e. either a) moving forwards from outputs to direct outcomes or b) moving forward from direct outcomes towards intermediate states. The evaluation will consider the involvement not only of those directly involved in project execution and those participating in technical or leadership groups, but also those official representatives whose cooperation is needed for change to be embedded in their respective institutions and offices. This factor is concerned with the level of ownership generated by the project over outputs and outcomes and that is necessary for long term impact to be realised. This ownership should adequately represent the needs of interest of all gendered and marginalised groups.

#### vi. Communication and Public Awareness

482. The evaluation will assess the effectiveness of: a) communication of learning and experience sharing between project partners and interested groups arising from the project during its life and b) public awareness activities that were undertaken during the implementation of the project to influence attitudes or shape behaviour among wider communities and civil society at large. The evaluation should consider whether existing communication channels and networks were used effectively, including meeting the differentiated needs of gendered or marginalised groups, and whether any feedback channels were established. Where knowledge sharing platforms have been established under a project the evaluation will comment on the sustainability of the communication channel under either socio-political, institutional or financial sustainability, as appropriate.

#### Section 3. EVALUATION APPROACH, METHODS AND DELIVERABLES

483. The Terminal Evaluation will be an in-depth evaluation using a participatory approach whereby key stakeholders are kept informed and consulted throughout the evaluation process. Both quantitative and qualitative evaluation methods will be used as appropriate to determine project achievements against the expected outputs, outcomes and impacts. It is highly recommended that the consultant(s) maintains close communication with the project team and promotes information exchange throughout the evaluation implementation phase in order to increase their (and other stakeholder) ownership of the evaluation findings. Where applicable, the consultant(s) should provide a geo-referenced map that demarcates the area covered by the project and, where possible, provide geo-reference photographs of key intervention sites (e.g. sites of habitat rehabilitation and protection, pollution treatment infrastructure, etc.)

484. The findings of the evaluation will be based on the following:

#### (a) A desk review of:

- Relevant background documentation, inter alia UNEP Medium-Term Strategy and respective Programmes of Work; survey undertaken for the International Conference on Mercury as a Global Pollutant
- Project design documents (including minutes of the Project Review Committee meeting at approval); Annual Work Plans and Budgets or equivalent, revisions to the project (Project Document Supplement), the logical framework and its budget;
- Project reports such as six-monthly progress and financial reports, progress reports from collaborating partners, meeting minutes, relevant correspondence and including the Project Implementation Reviews and Tracking Tool etc.;
- Project outputs: national mercury inventories; mercury toolkit (Spanish version)
- Evaluations/reviews of similar projects e.g. draft terminal review of "Development of Minamata Initial Assessment in Latin America and the Caribbean"
- (b) **Interviews** (individual or in group) with:
- UN Environment Task Manager (TM), Mr Ludovic Bernaudat
- Project management team; Ms Virginia Santana, Ms Alejandra Torre
- UN Environment Fund Management Officer (FMO); Ms Anuradha Shenoy
- Sub-Programme Coordinator Chemicals and Waste; Ms Tessa Goverse
- Project partners, including [names to be provided by BCCC-SCRC during inception];

Relevant resource persons: Mr Ramon Jimenez, consultant conducting the terminal review of the project "Development of Minamata Initial Assessment in Latin America and the Caribbean"

- (c) **Surveys** [to be defined during inception]
- (d) Field visits [Buenos Aires, Montevideo, Lima]
- (e) Other data collection tools [to be defined during inception]

#### **Evaluation Deliverables and Review Procedures**

- 485. The evaluation team will prepare:
  - **Inception Report:** (see Annex 1 for links to all templates, tables and guidance notes) containing an assessment of project design quality, a draft reconstructed Theory of Change of the project, project stakeholder analysis, evaluation framework and a tentative evaluation schedule.
  - Preliminary Findings Note: typically, in the form of a PowerPoint presentation, the sharing
    of preliminary findings is intended to support the participation of the project team, act as a
    means to ensure all information sources have been accessed and provide an opportunity to
    verify emerging findings. In the case of highly strategic project/portfolio evaluations or
    evaluations with an Evaluation Reference Group, the preliminary findings may be presented
    as a word document for review and comment.
  - Draft and Final Evaluation Report: (see links in Annex 1) containing an executive summary
    that can act as a stand-alone document; detailed analysis of the evaluation findings organised
    by evaluation criteria and supported with evidence; lessons learned and recommendations
    and an annotated ratings table.
  - **Evaluation Bulletin:** a 2-page summary of key evaluation findings for wider dissemination through the EOU website.
- 486. **Review of the draft evaluation report**. The evaluation team will submit a draft report to the Evaluation Manager and revise the draft in response to their comments and suggestions. Once a

draft of adequate quality has been peer-reviewed and accepted, the Evaluation Manager will share the cleared draft report with the Project Manager, who will alert the Evaluation Manager in case the report contains any blatant factual errors. The Evaluation Manager will then forward revised draft report (corrected by the evaluation team where necessary) to other project stakeholders, for their review and comments. Stakeholders may provide feedback on any errors of fact and may highlight the significance of such errors in any conclusions as well as providing feedback on the proposed recommendations and lessons. Any comments or responses to draft reports will be sent to the Evaluation Manager for consolidation. The Evaluation Manager will provide all comments to the evaluation team for consideration in preparing the final report, along with guidance on areas of contradiction or issues requiring an institutional response.

- 487. Based on a careful review of the evidence collated by the evaluation consultants and the internal consistency of the report, the Evaluation Manager will provide an assessment of the ratings in the final evaluation report. Where there are differences of opinion between the evaluator and the Evaluation Manager on project ratings, both viewpoints will be clearly presented in the final report. The Evaluation Office ratings will be considered the final ratings for the project.
- 488. The Evaluation Manager will prepare a **quality assessment** of the first and final drafts of the main evaluation report, which acts as a tool for providing structured feedback to the evaluation consultants. The quality of the report will be assessed and rated against the criteria specified in template listed in Annex 1 and this assessment will be appended to the Final Evaluation Report.
- 489. At the end of the evaluation process, the Evaluation Office will prepare a **Recommendations Implementation Plan** in the format of a table, to be completed and updated at regular intervals by the Task Manager. The Evaluation Office will track compliance against this plan on a six-monthly basis.

#### The Evaluation Consultant

- 490. For this evaluation, the evaluation team will consist of a Consultant who will work under the overall responsibility of the Evaluation Office represented by an Evaluation Manager Mr Francisco Alarcon in consultation with the UN Environment Task Manager Mr Ludovic Bernaudat, Fund Management Officer Ms Anuradha Shenoy and the Sub-programme Coordinator of the Chemicals and Waste Sub-programme Ms Tessa Goverse. The consultant will liaise with the Evaluation Manager on any procedural and methodological matters related to the evaluation. It is, however, the consultants' individual responsibility to arrange for their visas and immunizations as well as to plan meetings with stakeholders, organize online surveys, obtain documentary evidence and any other logistical matters related to the assignment. The UN Environment Task Manager and project team will, where possible, provide logistical support (introductions, meetings etc.) allowing the consultants to conduct the evaluation as efficiently and independently as possible.
- 491. The consultant will be hired for up to six months spread over the period 01 June to 30 November 2018 and should have: an advanced university degree in environmental sciences, international development or other relevant political or social sciences area; a minimum of 10 years of technical / evaluation experience, including of evaluating large, regional or global programmes and using a Theory of Change approach; a broad understanding of the Minamata Convention; expert knowledge in Mercury cycle; proficiency in Spanish along with excellent writing skills in English; team leadership experience and, where possible, knowledge of the UN system, specifically of the work of UN Environment.
- 492. The consultant will be responsible, in close consultation with the Evaluation Office of UN Environment, for overall management of the evaluation and timely delivery of its outputs, described above in Section 11 Evaluation Deliverables, above. The consultant will ensure that all evaluation criteria and questions are adequately covered.
- 493. In close consultation with the Evaluation Manager, the Evaluation Consultant will be responsible for the overall management of the evaluation and timely delivery of its outputs, data collection and analysis and report-writing. More specifically:

Inception phase of the evaluation, including:

- -preliminary desk review and introductory interviews with project staff;
- -draft the reconstructed Theory of Change of the project;
- -prepare the evaluation framework;
- -develop the desk review and interview protocols;
- -draft the survey protocols (if relevant);
- -develop and present criteria for country and/or site selection for the evaluation mission;
- -plan the evaluation schedule;
- prepare the Inception Report, incorporating comments until approved by the Evaluation Manager

Data collection and analysis phase of the evaluation, including:

- conduct further desk review and in-depth interviews with project implementing and executing agencies, project partners and project stakeholders;
- (where appropriate and agreed) conduct an evaluation mission(s) to selected countries, visit
  the project locations, interview project partners and stakeholders, including a good
  representation of local communities. Ensure independence of the evaluation and
  confidentiality of evaluation interviews.
- regularly report back to the Evaluation Manager on progress and inform of any possible problems or issues encountered and;
- keep the Project/Task Manager informed of the evaluation progress and engage the Project/Task Manager in discussions on emerging findings throughout the evaluation process.

#### Reporting phase, including:

- draft the Main Evaluation Report, ensuring that the evaluation report is complete, coherent and consistent with the Evaluation Manager guidelines both in substance and style;
- liaise with the Evaluation Manager on comments received and finalize the Main Evaluation Report, ensuring that comments are taken into account until approved by the Evaluation Manager
- prepare a Response to Comments annex for the main report, listing those comments not accepted by the Evaluation Consultant and indicating the reason for the rejection; and
- prepare a 2-page summary of the key evaluation findings and lessons;

#### Managing relations, including:

- maintain a positive relationship with evaluation stakeholders, ensuring that the evaluation process is as participatory as possible but at the same time maintains its independence;
- communicate in a timely manner with the Evaluation Manager on any issues requiring its attention and intervention.

#### Schedule of the evaluation

494. The table below presents the tentative schedule for the evaluation.

#### Table 3. Tentative schedule for the evaluation

Milestone	Tentative Dates	
Desk Review	Early July 2018	
Inception Report	Mid July 2018	
Telephone interviews, surveys etc	Late July 2018	

Evaluation Mission – Santiago, Buenos Aires, Montevideo and Lima	End August- early September 2018	
PowerPoint/presentation on preliminary findings and	Mid-September 2018	
recommendations		
Draft report to Evaluation Manager (and Peer Reviewer)	End September 2018	
Draft Report shared with UN Environment Project Manager and	Early October 2018	
team		
Draft Report shared with wider group of stakeholders	End October 2018	
Final Report	November 2018	
Final Report shared with all respondents	Mid November 2018	

#### **Contractual Arrangements**

- 495. The Evaluation Consultant will be selected and recruited by the Evaluation Office of UN Environment under an individual Special Service Agreement (SSA) on a "fees only" basis (see below). By signing the service contract with UN Environment/UNON, the consultant(s) certify that they have not been associated with the design and implementation of the project in any way which may jeopardize their independence and impartiality towards project achievements and project partner performance. In addition, they will not have any future interests (within six months after completion of the contract) with the project's executing or implementing units. All consultants are required to sigh the Code of Conduct Agreement Form.
- 496. Fees will be paid on an instalment basis, paid on acceptance by the Evaluation Manager of expected key deliverables. The schedule of payment is as follows:
- 497. Schedule of Payment for the Consultant:

Deliverable	Percentage Payment
Approved Inception Report (as per annex document 7)	30%
Approved Draft Main Evaluation Report (as per annex document 13)	30%
Approved Final Main Evaluation Report	40%

- 498. <u>Fees only contracts:</u> Air tickets will be purchased by UN Environment and 75% of the Daily Subsistence Allowance for each authorised travel mission will be paid up front. Local in-country travel will only be reimbursed where agreed in advance with the Evaluation Manager and on the production of acceptable receipts. Terminal expenses and residual DSA entitlements (25%) will be paid after mission completion.
- 499. In case the consultant is not able to provide the deliverables in accordance with these guidelines, and in line with the expected quality standards by the UN Environment Evaluation Office, payment may be withheld at the discretion of the Director of the Evaluation Office until the consultants have improved the deliverables to meet UN Environment's quality standards.
- 500. If the consultant fail to submit a satisfactory final product to UN Environment in a timely manner, i.e. before the end date of their contract, the Evaluation Office reserves the right to employ additional human resources to finalize the report, and to reduce the consultants' fees by an amount equal to the additional costs borne by the Evaluation Office to bring the report up to standard.

## Annex VIII. Delivery of project activities in each participant country

Country/proje ct Component	Argentina	Ecuador	Peru	Uruguay	Regional			
Outcome 1: Infe	Outcome 1: Information needs identified in participating countries							
Regional Inception Workshop	i) Implemented a national inception workshop with relevant stakeholders (April 2016); ii) Settled a national worktable with relevant stakeholders	i) Implemented a national workshop for the inventory (February 2017); ii) Settled a national worktable with relevant stakeholders	i) National workshop on implementation of Minamata Convention implementation (March 2017); ii) implemented a government meeting with relevant state agencies involved in mercury issues (March 2017); iii) Settled a national worktable on chemical issues with relevant institutions.	workshops for launching the project; ii) settled a	and infrastructure to set-up			
1.1 Workplan, budget and M&E plan endorsed by all participant countries	i) MOU signed (2015); ii) workplans and budgets elaborated on an annual basis	i) MOU signed (Nov 2016); ii) workplans and budgets elaborated on an annual basis	i) MOU signed (2015); ii) workplans and budgets elaborated on an annual basis	i) MOU signed (2015); ii) workplans and budgets elaborated on an annual basis	BCCC-SCRC submitted: i) quarterly reports on project progress; ii) annual financial reports; iii) annual PIRs (2014, 2015, 2016, 2017 and 2018)			
1.2 Existing materials and information on mercury identified and utilized	Searching and compilation of existing information related with mercury management, contamination, existing regulations, etc.	information related with mercury management, contamination, existing regulations, etc.	Searching and compilation of existing information related with mercury management, contamination, existing regulations, etc.	compilation of existing information related with mercury management, contamination, existing regulations, etc.	regional Workshop on "Enhancing Parties Capacities for Environmentally Sound Management of Mercury Wastes" held in Montevideo (Nov 2015); iii) mercury toolkit translated into Spanish (2016).			

Outcome 2: Comprehensive information on mercury sources and releases enable a better understanding of mercury risks to human health and the environment for participating countries

Country/proje ct Component	Argentina	Ecuador	Peru	Uruguay	Regional		
2.1 Level 1 and Level 2 mercury inventories for each participant country identifying key sectors		i) Level 2 inventories for 10 key sectors (2017)	i) National inventory level 1 (2015-2016)	i) Level 2 inventory (2016) for 10 key sectors.	, ,		
	Outcome 3: Enhanced understanding of national priority sources and capacity for mercury management through the development of national mercury risk management approaches including the identification of management gaps and needs						
3.1 Number of mercury priorities set in each participating country	disposal of domestic wastes; iii) sewage		i) Gold extraction by means with and without mercury amalgam.	i) 1 chlor-alkali plant; ii) extraction and use of fuels/energy			

Country/proje ct Component	Argentina	Ecuador	Peru	Uruguay	Regional
3.2 Number of assessments on regulatory aspects and means for mercury emissions control	wastes in the hospital sector; iii) transport and hazardous waste management; iv) use and management of hazardous materials in labor environments; vi)	to imports of mercury; iii) It was identified that some of the regulations related with mining activities should be updated/revised to comply with the	Mercury related regulations were identified for Energy, Health, Domestic wastes, Agriculture, Industry, Mining and Environment sectors.: i) no regulations for batteries containing mercury; ii) content of mercury in lamps is regulated, but technical standards for sound mercury management and disposal for lamps is needed; iii) phase-out of mercury containing lamps is needed; iv) maximum content of hazardous chemicals in labor environments is regulated; vi) there is a technical guidelines for diagnosis and treatment of intoxications by mercury; vii) use of mercury in cosmetics is regulated since 2017; viii) mercury in toys and office products is regulated since 2007; ix) The plan of action for implementing the Minamata convention is into force since 2017 and includes a reduction schedule for mercury in dental amalgams; x) in 2017 there is an standard for maximum permissible amounts of gaseous mercury in air; xi) since 2008 limits for discharge of liquid effluents to the environment from oil activities are set.	regulations controlling discharge of effluents, transport and disposal of hazardous wastes and chemicals from different industries and agriculture. In 2019, it was approved a regulation on sound management and disposal of lamps and other wastes	
3.3 Number of data sets collected and analysed greatly contribute to the development of national risk management approaches	inorganic analytes for technical assistance to private and public sectors; ii) capacity for determination of total	ii) it seems that 2 studies were made during the project implementation: risk management for mercury (2017) monitoring of rivers in the province of	i) Compilation of 251 studies related with mercury content in several matrices (water, fish, sediments, humans); ii) analysis of mercury content in cosmetics	No information	i) Training on technics for monitoring and analysis of mercury in biotic and abiotic matrices for 10 technical officials from participant countries was made in Slovenia (Nov 2017); ii) in planning to be implemented by 2019: a) Mercury Passive air monitoring (3 months), with samples to be

Country/proje ct Component	Argentina	Ecuador	Peru	Uruguay	Regional
	shellfish, and in propylene; iii) trainings on good practices for chemical labs, prevention of labor risks, safety and management of chemical products, control of emissions of mercury, monitoring and technological approaches to reduce mercury in water and food products.				analysed by the Consiglio Nazionale delle Ricerche (CNR), Rome, Italy; ii) Mercury laboratory Intercomparison exercise in different matrices (standard solutions, biota and/or human hair) with the Research Centre for Toxic Compounds in the Environment (RECETOX), Czech Republic.
3.4 Number of prioritized national mercury risk management approaches for mercury reduction	Risk management plan includes: i) work on gaps found on mercury sources such as manometers and other measuring equipment; ii) identify potential contaminated sites; iii) small gold mining; iv) make research on population exposed to risks; v) studies on mitigation of risks from mercury sources; vi) elaboration of guidelines of good practices; vii) elaboration of communication strategies aimed at general public opinion.	Mercury 2018-2028 elaborated, which includes the following: i) program for eliminating mercury in artisanal and small-scale gold mines; ii) program to minimize imports of products and equipment containing mercury (thermometers, lamps, batteries); iii) program for management and disposal of	Peru has a National Risk Management Plan including: i) mining (requirement to companies to declare composition of gold ores to determine mercury as byproduct); ii) establishment of a policy to collect mercury containing products and public awareness campaign; iii) start registering gold production from artisanal and small scale gold mines; iv) training and awareness of small gold mines to define their own emission factors; v) standardization in methods for monitoring and determination of mercury in humans.	No info available.	i) Training on contaminated sites with mercury was carried out at BCCC-SCRC for Energy, Environmental and Technological Research (CIEMAT), Madrid (oct 2017); ii) risk communication training carried out in Ecuador and Peru (May 2017) and Argentina and Uruguay (Aug 2017), by specialists from the Center for Disease Control and Prevention (CDC), USA; iii) 2 Webinars on Communication of Mercury risks was organized by UNITAR and the BCCC-SCRC (Dec 2017, Jan 2018).

Country/proje ct Component	Argentina	Ecuador	Peru	Uruguay	Regional
Activity 4.1 Compile regional lessons learned in key sectors and develop regional report and organize 1st lessons learned workshop	project schedule considering local circumstances; ii) for good project planning the establishment workgroups with key stakeholders and early agreements with entities that manage the funds are key aspects; iii) no start activities if funds are not available to all participants; iv) during the project design stage it would be necessary to measure the perception of the stakeholders (private companies, NGO, industry associations) in projects requiring their participation to ensure compliance with project	projects promoted by the Ministry of Environment; iii) the information from the mining sector (metal) is of bad quality; iv) the participation of the public and private sectors in the inventory resulted in the agile collection of information and of better quality in comparison of the first inventory; v) the use of level 1 of the toolkit allowed a simpler learning process; vi) the use of level 2 of the toolkit allowed adjustments of parameters more in line with the real condition of the country; vii) the inventory revealed that lack of data on mercury content in products, the insufficient data from the mining sector and dispersed information on hazardous waste management existing in the country; viii) to improve access to information on labor and environmental conditions' public programs for small scale mining is needed; ix) mining sector is complex to tackle since there is informality, money laundry, mercury traffic and presence of illegal groups; x) project established a workgroup between the mining and environment ministries, but the collection of information from	for research from the national academic community was noted; iv) joint work among sectoral authorities demonstrated positive benefits for the project progress and allowed exchange and participation with several specialists that facilitated elaboration of conclusions and establishment of clear targets for the application of the Minamata Convention; v) the international cooperation allowed faster implementation of the Minamata Convention in the country, facilitating the discussion and consensus on mercury management of all public bodies involved in this issue (workshops, promotion of good practices in the mining sector, provision of international experts; vi) dissemination of results achieved by the project is the best tool available to the Peruvian state to aware key stakeholders of progress on the strengthening of national regulations related with mercury management in the country; vii) the use of an standardized tool (the toolkit) facilitated the process of identifying the key stakeholders and the information	No information	i) Each participant country elaborated their own lessons learnt reports, that were compiled and edited by BCCC-SCRC. The above resulted in a Regional Lessons Learnt Report elaborated by BCCC-SCRC (2017); ii) a joint regional workshop was implemented to discuss the results obtained and lessons learnt by both projects (Nov 2017).

Country/proje ct Component	Argentina	Ecuador	Peru	Uruguay	Regional
		monitoring of environmental quality in priority sectors is urgent; xiii) regulatory proposals should be elaborated with the participation of the institutions involved in mercury issues; xiv) the plans elaborated under this project are in line with the Minamata Convention provisions; xv) the international cooperation is needed; xvi) dissemination of results from the inventory and the national plan is the best tool on mercury management in the country.			
Activity 4.2 Develop and disseminate a final report on lessons learned report and organize last lessons learned workshop	Elaborated a national report on lessons learnt (2018)		Elaborated a national report on lessons learnt (2018)	Elaborated a national report on lessons learnt (2018)	BCCC-SCRC submitted an integrated regional report on lessons learnt from the implementation of the project (Aug 2018). This report should be shared among participating countries and uploaded into UN Environment webpage to make it available to all parties interested in mercury management issues.
Activity 4.3 Implement a Monitoring and Evaluation Plan	A national steering committee was set, and included the Secretariat for the Environment, INTI, Ministries of Health, Mining and Industry. Greenpeace also participated in this PSC; ii) quarterly reports on project progress were submitted, along annual financial reports.		i) This country did not set a PSC, but the Technical Group for Chemical Substances (composed for government institutions) performed the role of follow-up and planning of activities; ii) quarterly reports on project progress and annual financial reports were submitted.	committee lead by DINAMA (composed by government	established a system of quarterly and annual reports to UN Environment; ii) 3 PIR were submitted; iii) project's final report is being elaborated; iv) annual audits and financial reports submitted to UN

Country/proje ct Component	Argentina	Ecuador	Peru	Uruguay	Regional
					project implementation; vi) a midterm self-evaluation was conducted in 2016.

## Annex IX.Quality assessment of the evaluation report

## **Quality Assessment of the Evaluation Report**

All UN Environment evaluations are subject to a quality assessment by the Evaluation Office. This is an assessment of the quality of the evaluation product (i.e. evaluation report) and is dependent on more than just the consultant's efforts and skills. Nevertheless, the quality assessment is used as a tool for providing structured feedback to evaluation consultants, especially at draft report stage. This guidance is provided to support consistency in assessment across different Evaluation Managers and to make the assessment process as transparent as possible.

	UN Environment Evaluation Office Comments	Final Report Rating
Substantive Report Quality Criteria		
Quality of the Executive Summary:	Final report: The executive	
The Summary should be able to stand alone as an accurate summary of the main evaluation product. It should include a concise overview of the evaluation object; clear summary of the evaluation objectives and scope; overall evaluation rating of the project and key features of performance (strengths and weaknesses) against exceptional criteria (plus reference to where the evaluation ratings table can be found within the report); summary of the main findings of the exercise, including a synthesis of main conclusions (which include a summary response to key strategic evaluation questions), lessons learned and recommendations.	summary is well presented.	S
I. Introduction	Final report: The introduction	
A brief introduction should be given identifying, where possible and relevant, the following: institutional context of the project (sub-programme, Division, regions/countries where implemented) and coverage of the evaluation; date of PRC approval and project document signature); results frameworks to which it contributes (e.g. Expected Accomplishment in POW); project duration and start/end dates; number of project phases (where appropriate); implementing partners; total secured budget and whether the project has been evaluated in the past (e.g. mid-term, part of a synthesis evaluation, evaluated by another agency etc.)  Consider the extent to which the introduction includes a	includes all the required elements and is well presented.	S
concise statement of the purpose of the evaluation and the key intended audience for the findings?		
II. Evaluation Methods	Final report: The evaluation methods have been well	
This section should include a description of how the <i>TOC</i> at Evaluation <sup>44</sup> was designed (who was involved etc.) and applied to the context of the project?	described.	S
A data collection section should include: a description of evaluation methods and information sources used, including		

<sup>&</sup>lt;sup>44</sup> During the Inception Phase of the evaluation process a *TOC at Design* is created based on the information contained in the approved project documents (these may include either logical framework or a TOC or narrative descriptions). During the

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	UN Environment Evaluation Office Comments	Final Report Rating
the number and type of respondents; justification for methods used (e.g. qualitative/ quantitative; electronic/face-to-face); any selection criteria used to identify respondents, case studies or sites/countries visited; strategies used to increase stakeholder engagement and consultation; details of how data were verified (e.g. triangulation, review by stakeholders etc.).  Methods to ensure that potentially excluded groups (excluded by gender, vulnerability or marginalisation) are reached and their experiences captured effectively, should be made explicit in this section.  The methods used to analyse data (e.g. scoring; coding; thematic analysis etc.) should be described.		
III. The Project	Final report: The project has	
This section should include:	been well described.	
<ul> <li>Context: Overview of the main issue that the project is trying to address, its root causes and consequences on the environment and human well-being (i.e. synopsis of the problem and situational analyses).</li> <li>Objectives and components: Summary of the project's results hierarchy as stated in the ProDoc (or as officially revised)</li> <li>Stakeholders: Description of groups of targeted stakeholders organised according to relevant common characteristics</li> <li>Project implementation structure and partners: A description of the implementation structure with diagram and a list of key project partners</li> <li>Changes in design during implementation: Any key events that affected the project's scope or parameters should be described in brief in chronological order</li> <li>Project financing: Completed tables of: (a) budget at design and expenditure by components (b) planned and actual sources of funding/co-financing</li> </ul>		HS
IV. Theory of Change	Final report: The ToC has	
The TOC at Evaluation should be presented clearly in both diagrammatic and narrative forms. Clear articulation of each major causal pathway is expected, (starting from outputs to long term impact), including explanations of all drivers and assumptions as well as the expected roles of key actors.  Where the project results as stated in the project design documents (or formal revisions of the project design) are not an accurate reflection of the project's intentions or do not follow OECD/DAC definitions of different results levels, project results may need to be re-phrased or reformulated. In such cases, a summary of the project's results hierarchy should be presented for: a) the results as stated in the approved/revised	been well presented. The drivers and assumptions affecting the different impact pathways could have been described more clearly in the narrative.	S

evaluation process this TOC is revised based on changes made during project intervention and becomes the *TOC at Evaluation*.

	UN Environment Evaluation Office Comments	Final Report Rating
ProDoc LogFrame/TOC and b) as formulated in the TOC at Evaluation. The two results hierarchies should be presented as a two-column table to show clearly that, although wording and placement may have changed, the results 'goal posts' have not been 'moved'.		
V. Key Findings	Final report: Relevance has been adequately discussed.	
A. Strategic relevance:  This section should include an assessment of the project's relevance in relation to UN Environment's mandate and its alignment with UN Environment's policies and strategies at the time of project approval. An assessment of the complementarity of the project with other interventions addressing the needs of the same target groups should be included. Consider the extent to which all four elements have been addressed:	been adequately discussed.	MS
v. Alignment to the UN Environment Medium Term Strategy (MTS) and Programme of Work (POW) vi. Alignment to UN Environment/ Donor/GEF Strategic Priorities vii. Relevance to Regional, Sub-regional and National Environmental Priorities viii. Complementarity with Existing Interventions		
B. Quality of Project Design  To what extent are the strength and weaknesses of the project design effectively summarized?	Final report: The strengths and weaknesses of the project design have been well summarized.	S
C. Nature of the External Context  For projects where this is appropriate, key external features of the project's implementing context that limited the project's performance (e.g. conflict, natural disaster, political upheaval), and how they affected performance, should be described.	Final report: Nature of the external context has been adequately described.	MS
D. Effectiveness  (i) Outputs and Direct Outcomes: How well does the report present a well-reasoned, complete and evidence-based assessment of the a) delivery of outputs, and b) achievement of direct outcomes? How convincing is the discussion of attribution and contribution, as well as the constraints to attributing effects to the intervention.	Final report: Effectiveness has been well discussed.	S
The effects of the intervention on differentiated groups, including those with specific needs due to gender, vulnerability or marginalisation, should be discussed explicitly.		
(ii) Likelihood of Impact: How well does the report present an integrated analysis, guided by the causal pathways represented by the TOC, of all evidence relating to likelihood of impact?	Final report: Likelihood of impact has been well discussed. The discussion is grounded on ToC.	S

	UN Environment Evaluation Office Comments	Final Report Rating
How well are change processes explained and the roles of key actors, as well as drivers and assumptions, explicitly discussed?		
Any unintended negative effects of the project should be discussed under Effectiveness, especially negative effects on disadvantaged groups.		
E. Financial Management  This section should contain an integrated analysis of all dimensions evaluated under financial management and include a completed 'financial management' table.	Final report: The section has been rated MS due to the limited financial information provided by the project.	
consider how well the report addresses the following:         completeness of financial information, including the actual project costs (total and per activity) and actual co-financing used     communication between financial and project management staff		MS
F. Efficiency  To what extent, and how well, does the report present a well-reasoned, complete and evidence-based assessment of efficiency under the primary categories of cost-effectiveness and timeliness including:  • Implications of delays and no cost extensions • Time-saving measures put in place to maximise results within the secured budget and agreed project timeframe • Discussion of making use of/building on pre-existing institutions, agreements and partnerships, data sources, synergies and complementarities with other initiatives, programmes and projects etc.	Final report: Efficiency has been adequately discussed. Gaps in financial information limited the depth of the assessment.	MS
The extent to which the management of the project minimised UN Environment's environmental footprint.  G. Monitoring and Reporting	Final report: Monitoring and	
How well does the report assess:  Monitoring design and budgeting (including SMART indicators, resources for MTE/R etc.)  Monitoring of project implementation (including use of monitoring data for adaptive management)  Project reporting (e.g. PIMS and donor report)	reporting have been well discussed.	S
H. Sustainability  How well does the evaluation identify and assess the key conditions or factors that are likely to undermine or contribute to the persistence of achieved direct outcomes including:  Socio-political Sustainability Financial Sustainability Institutional Sustainability	Final report: Sustainability has been adequately discussed.	MS

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I. Factors Affecting Performance  These factors are not discussed in stand-alone sections but are integrated in criteria A-H as appropriate. Note that these are described in the Evaluation Criteria Ratings Matrix. To what extent, and how well, does the evaluation report cover the following cross-cutting themes:  • Preparation and readiness	Final report: Factors affecting performance have been well discussed.	S
<ul> <li>Quality of project management and supervision<sup>45</sup></li> <li>Stakeholder participation and co-operation</li> <li>Responsiveness to human rights and gender equity</li> <li>Country ownership and driven-ness</li> <li>Communication and public awareness</li> </ul>		
VI. Conclusions and Recommendations i.Quality of the conclusions: The key strategic questions should be clearly and succinctly addressed within the conclusions section. It is expected that the conclusions will highlight the main strengths and weaknesses of the project, and connect them in a compelling story line. Human rights and gender dimensions of the intervention (e.g. how these dimensions were considered, addressed or impacted on) should be discussed explicitly. Conclusions, as well as lessons and recommendations, should be consistent with the evidence presented in the main body of the report.	Final report: Conclusions are nicely presented.	S
ii) Quality and utility of the lessons: Both positive and negative lessons are expected and duplication with recommendations should be avoided. Based on explicit evaluation findings, lessons should be rooted in real project experiences or derived from problems encountered and mistakes made that should be avoided in the future. Lessons must have the potential for wider application and use and should briefly describe the context from which they are derived and those contexts in which they may be useful.	Final report: Lessons have been well formulated.	S
iii) Quality and utility of the recommendations: To what extent are the recommendations proposals for specific action to be taken by identified people/position-holders to resolve concrete problems affecting the project or the sustainability of its results? They should be feasible to implement within the timeframe and resources available (including local capacities) and specific in terms of who would do what and when.  At least one recommendation relating to strengthening the human rights and gender dimensions of UN Environment interventions, should be given.	Final report: Recommendations have been well formulated.	S

<sup>&</sup>lt;sup>45</sup> In some cases 'project management and supervision' will refer to the supervision and guidance provided by UN Environment to implementing partners and national governments while in others, specifically for GEF funded projects, it will refer to the project management performance of the executing agency and the technical backstopping provided by UN Environment.

	UN Environment Evaluation Office Comments	Final Report Rating
Recommendations should represent a measurable performance target in order that the Evaluation Office can monitor and assess compliance with the recommendations.		
VII. Report Structure and Presentation Quality		
i)Structure and completeness of the report: To what extent does the report follow the Evaluation Office guidelines? Are all requested Annexes included and complete?	Final report: The report carefully follows EOU guidelines.	HS
ii)Quality of writing and formatting: Consider whether the report is well written (clear English language and grammar) with language that is adequate in quality and tone for an official document? Do visual aids, such as maps and graphs convey key information? Does the report follow Evaluation Office formatting guidelines?	Final report: The quality of writing and formatting is good.	S
OVERALL REPORT QUALITY RATING		S

A number rating 1-6 is used for each criterion: Highly Satisfactory = 6, Satisfactory = 5, Moderately Satisfactory = 4, Moderately Unsatisfactory = 3, Unsatisfactory = 2, Highly Unsatisfactory = 1. The overall quality of the evaluation report is calculated by taking the mean score of all rated quality criteria.

At the end of the evaluation, compliance of the <u>evaluation process</u> against the agreed standard procedures is assessed, based on the table below. *All questions with negative compliance must be explained further in the table below.* 

Evaluat	ion Process Quality Criteria	Comp	liance
		Yes	No
Indeper	ndence:		
1.	Were the Terms of Reference drafted and finalised by the Evaluation Office?	х	
2.	Were possible conflicts of interest of proposed Evaluation Consultant(s) appraised and addressed in the final selection?	х	
3.	Was the final selection of the Evaluation Consultant(s) made by the Evaluation Office?	х	
4.	Was the evaluator contracted directly by the Evaluation Office?	х	
5.	Was the Evaluation Consultant given direct access to identified external stakeholders in order to adequately present and discuss the findings, as appropriate?	Х	
6.	Did the Evaluation Consultant raise any concerns about being unable to work freely and without interference or undue pressure from project staff or the Evaluation Office?		x
7.	If Yes to Q6: Were these concerns resolved to the mutual satisfaction of both the Evaluation Consultant and the Evaluation Manager?		
Financi	al Management:		
8.	Was the evaluation budget approved at project design available for the evaluation?	х	
9.	Was the final evaluation budget agreed and approved by the Evaluation Office?	х	
10.	Were the agreed evaluation funds readily available to support the payment of the evaluation contract throughout the payment process?	x	
Timelin	ess:		
11.	If a Terminal Evaluation: Was the evaluation initiated within the period of six	х	

Evaluati	on Process Quality Criteria	Comp	oliance
		Yes	No
	months before or after project operational completion? Or, if a Mid Term		
	Evaluation: Was the evaluation initiated within a six-month period prior to the		
	project's mid-point?		
12.	Were all deadlines set in the Terms of Reference respected, as far as	Х	
	unforeseen circumstances allowed?		
13.	Was the inception report delivered and reviewed/approved prior to commencing any travel?	x	
Project's	s engagement and support:		
14.	Did the project team, Sub-Programme Coordinator and identified project	х	
	stakeholders provide comments on the evaluation Terms of Reference?		
15.	Did the project make available all required/requested documents?		х
	Did the project make all financial information (and audit reports if applicable)		х
	available in a timely manner and to an acceptable level of completeness?		
17.	Was adequate support provided by the project to the evaluator(s) in planning	х	
	and conducting evaluation missions?		
18.	Was close communication between the Evaluation Consultant, Evaluation	х	
	Office and project team maintained throughout the evaluation?		
19.	Were evaluation findings, lessons and recommendations adequately	х	
	discussed with the project team for ownership to be established?		
20.	Did the project team, Sub-Programme Coordinator and any identified project	х	
	stakeholders provide comments on the draft evaluation report?		
Quality a	assurance:		
	Were the evaluation Terms of Reference, including the key evaluation	х	
	questions, peer-reviewed?		
22.	Was the TOC in the inception report peer-reviewed?	х	
	Was the quality of the draft/cleared report checked by the Evaluation	х	
	Manager and Peer Reviewer prior to dissemination to stakeholders for		
	comments?		
24.	Did the Evaluation Office complete an assessment of the quality of both the	х	
	draft and final reports?		
Transpa			
	Was the draft evaluation report sent directly by the Evaluation Consultant to	х	
	the Evaluation Office?		
26.	Did the Evaluation Manager disseminate (or authorize dissemination) of the	х	
	cleared draft report to the project team, Sub-Programme Coordinator and		
	other key internal personnel (including the Reference Group where		
	appropriate) to solicit formal comments?		
27.	Did the Evaluation Manager disseminate (or authorize dissemination)	х	
	appropriate drafts of the report to identified external stakeholders, including		
	key partners and funders, to solicit formal comments?		
28.	Were stakeholder comments to the draft evaluation report sent directly to the	х	
	Evaluation Office		
29.	Did the Evaluation Consultant(s) respond to all factual corrections and	х	
	comments?		
30.	Did the Evaluation Office share substantive comments and Evaluation	х	
	Consultant responses with those who commented, as appropriate?		

## <u>Provide comments / explanations / mitigating circumstances below for any non-compliant process issues.</u>

Process Criterion Number	Evaluation Office Comments