Terminal Evaluation of the UN Environment Project

"Development of a National Implementation Plan in Brazil as a first step to implement the Stockholm Convention on Persistent Organic Pollutants (POPs)"

Evaluation Office of UN Environment

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Development of a National Implementation Plan in Brazil as a first step to implement the Stockholm Convention on Persistent Organic Pollutants (POPs)
2096
12/09/18

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List of acronyms and abbreviations

BRS	Basel, Rotterdam and Stockholm Secretariat
CETESB	Environmental Body of the State of São Paulo, and Regional Centre of the Stockholm Convention for Latin America and the Caribbean
CONASQ	National Commission on Chemical Safety
DDT	Dichloro diphenyl trichloroethane
DTIE	Division of Technology, Industry and Economy
GEF	Global Environment Facility
GNC	National Coordinating Group
GTI	Inter-institutional Technical Group
ICA	Internal Cooperation Agreement
IFCS	Intergovernmental Forum on Chemical Safety
M&E	Monitoring and Evaluation
MMA	Ministerio do Meio Ambiente – Ministry of Environment
MRE	Ministry of Foreign Relations
NGO	Non-Governmental Organizations
NIP	National Implementation Plan
PCBs	Polychlorinated Biphenyls
PDF	Proposal for Project Development Funds
PIC	Prior Informed Consent
PIF	Project Identification Form
PIR	Project Implementation Review
POP	Persistent Organic Pollutants
SC	Stockholm Convention
SQA	Secretariat for Environmental Quality in Human Settlements
TE	Terminal Evaluation
UN	United Nations

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Cristóbal Vignal, Senior International Evaluator and Lead Consultant prepared this Terminal Evaluation for the Evaluation Office of UN Environment. The report benefits from a peer review conducted within the Evaluation Office of UN Environment.

The Evaluation Office of UN Environment would like to thank the Brazil National Implementation Plan (NIP) project team and in particular Marco Antonio Ambrosio and Francisca Mendes de Menezes for their contribution and collaboration throughout the Evaluation process. Sincere appreciation is also expressed to the Project stakeholders who took time to provide comments on the draft report. The Evaluation Office of UN Environment would also like to thank the representatives of the Government of Brazil.

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Cristóbal Vignal – Graduated from the universities of Baja California (Marine Sciences), Marseille (Oceanography) and Bordeaux (Tropical Geography). His thesis (DEA) on remote sensing applied to coastal oceanography, demonstrated the impact of paleo-climate on coastal zones. Mr Vignal acquired, as part of advanced studies in oceanography, in depth training in fluid mechanics, meteorology, earth sciences, chemistry, physics and geology. He is enjoying over 25 years of experience at senior level as manager, advisor, principal specialist, expert and evaluator both with the UN, and as independent advisor and senior consultant.

Expertise includes planning, development, coordination and management of complex, multidisciplinary projects and programmes, monitoring and evaluation of results, and organizational design in the fields of ozone layer protection (Montreal Protocol), hazardous waste management (Basel Convention), POPs controlled under the Stockholm Convention and SAICM, renewable energy and energy efficiency and also, and to a lesser degree, biodiversity, climate change (Kyoto), private sector development, trade and agro-projects.

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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 2011 and 2015. The main overarching goal of the project aligns it with the obligations of the Stockholm Convention (SC), namely to protect human health and the environment through the implementation of the SC. The projects objective, as stated in the Project Identification Form (PIF) is: To develop the National Implementation Plan (NIP) in accordance with the requirements of Article 7[1] of the Convention, taking into account the guidance adopted at the First Conference of the Parties.

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 Ministry of Environment of Brazil.

Key words: TE; Terminal Evaluation; GEF; GEF Project; POPs; Persistent Organic Pollutants; Brazil

[1] *Article 7 Implementation Plans*

Each Party shall:

- *Develop and endeavor to implement a plan for the implementation of its obligations under this Convention;*
- *Transmit its implementation plan to the CoP within two years of the date on which this Convention enters into force for it; and*
- *Review and update, as appropriate, its implementation plans on a periodic basis and in a manner to be specified by a decision of the CoP.*

The Parties shall, where appropriate, cooperate directly or through global, regional and sub regional organizations, and consult their national stakeholders, including women's groups and groups involved in the health of children, in order to facilitate the development, implementation and updating of their implementation plans.

The Parties shall endeavor to utilize and, where necessary, establish the means to integrate NIPs for POPs in their sustainable development strategies where appropriate.

Project Identification Tables

Table 1: Project Summary – GEF ID 2096

GEF Project ID:	**2096**		
Implementing Agency:	UN Environment Economy Division[2]	**Executing Agency:**	Ministry of the Environment of Brazil
Sub-programme:	Chemicals and waste	**Expected Accomplishment(s):**	Improve coherence and cooperation among environment related mechanisms Support the development and evolution of internationally agreed chemical management regimes Assist countries in increasing capacities for sound management of chemicals
UN Environment approval date:	28 April 2008	**Programme of Work Output(s):**	N/A
GEF approval date:	03 October 2007[3]	**Project type:**	Full-size project
GEF Operational Programme #:	Persistent Organic Pollutants, OP14	**Focal Area(s):**	Persistent Organic Pollutants (POPs)
		GEF Strategic Priority:	GEF IV Strategic Priority 1: strengthen capacities for NIP implementation
***Expected* start date:**	January 2008	**Actual start date:**	December 2009
***Planned* completion date:**	December 2009	**Actual completion date:**	May 2017
***Planned* project budget at approval:**	2,719,973 USD	**Actual total expenditures reported as of [date]:**	2,719,973 USD

[2] *Previously Division of Technology, Industry and Economy (DTIE)*

[3] *GEF project database (https://www.thegef.org/project/development-national-implementation-plan-brazil-first-step-implement-stockholm-convention)*

GEF grant allocation:	1,263,518 USD	**GEF grant expenditures reported as of June 2015:**	979,407.23 USD[4]
Project Preparation Grant - GEF financing:	350,000 USD	**Project Preparation Grant - co-financing:**	130,000 USD in-kind (65,000 USD UN Environment, 65,000 USD Brazil Gov.)
***Expected* Full-Size Project co-financing:**	1,456,455 USD[5]	**Secured Full-Size Project co-financing:**	1,522,220 USD[6]
First disbursement:		**Date of financial closure:**	After terminal evaluation
No. of revisions:	**6**	**Date of last revision:**	March 2017
No. of Steering Committee meetings:	National Coordinating Group met as required	**Date of last/next Steering Committee meeting:**	Last: March 2015 / Next: N/A
Mid-term Review/ Evaluation *(planned date):*	n/a	**Mid-term Review/ Evaluation (actual date):**	n/a
Terminal Evaluation *(planned date):*	End of project	**Terminal Evaluation (actual date):**	October 2018
Coverage	Brazil	**Coverage - Region**	Latin America - Brazil
Dates of previous project phases:	n/a	**Status of future project phases:**	NIPs update project (approved by GEF 2015)

[4] PIR June 2015

[5] Project Document – GEF Database

[6] Final Report (period December 2009 -May 2017)

Executive Summary

1. This report presents the findings of the Terminal Evaluation of the UN Environment project entitled "Development of a National Implementation Plan in Brazil as a first step to implement the Stockholm Convention on Persistent Organic Pollutants (POPs)" developed under the Stockholm Convention and funded by the Global Environment Facility (GEF). The overall budget for the Project at approval was of 2,719,973 USD and included a GEF Grant allocation of 1,263,518 USD.

2. The project was approved for implementation by the GEF on 3 October 2007. The project was to start in January of 2008 and end in December of 2009 (24 months). The project received 6 no-cost extensions, the last of which extended the duration to 9 years and 5 months (up to May 2017). The GEF Implementing Agency for the project was UN Environment and followed a national implementation modality, with the Brazilian Ministry of the Environment (MMA) as the Executing Agency.

3. The purpose of this full-size project was to develop the National Implementation Plan (NIP) to guide the implementation of the Convention in Brazil. The NIP endorsed by the Brazilian Government represents the principal intended Output of this full-size project while the demonstrated sustainable capability to implement the Convention in Brazil is its principal Outcome.

4. The overall objective of the Terminal Evaluation is to assess in a systematic and objective manner the performance of the project against the Theory of Change using the UN Environment Evaluation Office's standard evaluation criteria. Different methods were used to ensure that data gathering and analysis delivered evidence-based qualitative and quantitative information, obtained from a wide range of sources, including desk review of studies and literature, individual anonymous and confidential in-depth interviews, e-mails, and field visits (October-November of 2018). The key question of the Terminal Evaluation was whether the project has achieved or is likely to achieve the project goal of "protecting human health and the environment from persistent organic pollutants" – the principal objective of the Stockholm Convention.

Evaluation Findings

5. The overall evaluation rating for the project is Highly Satisfactory and ratings for the evaluation criteria are detailed in Table 6: Ratings Table, below.

6. The strategic relevance of the project was found to be highly satisfactory; it is aligned with the mandate, Mid Term Strategy (MTS) and thematic priorities of UN Environment; with regional, sub-regional and national environmental priorities; with target group and beneficiaries' needs and priorities; with GEF Strategic priorities and is complementary to existing interventions. In addition, it also shows alignment with UN Environment capacity building and South-South cooperation policies.

7. The project was designed to respond to concerns regarding the lack of capacities to develop a National Implementation Plan. The project document laid out goals and objectives in a manner consistent with priorities and was developed using the appropriate standards of the time. In general, the narrative synthesis is consistent and fact based; the products are necessary to achieve the expected results. However, the Terminal Evaluation considers that, given it was extended on 6 occasions, it would have benefitted from a review/revision – further or as a condition - for these extensions to be granted. This would have brought the design up-to-date with current UN Environment policies. No other major issues were flagged with project design; however, the document could have benefitted from a more in-depth description

regarding the actual project preparation; strategic relevance; intended results and causality; and most importantly risk identification.; overall the quality of project design was rated as Satisfactory.

8. Although different country specific events occurred during the period of implementation of this Project, in general this criterion is not considered to have had a significant negative effect on delivery of the expected Outputs. This did require mitigation strategies, including hiring of permanent ministry staff, adaptive management, mobilization of co-financing to ensure continuation of activities, etc. which were in general successfully developed, although they cost the project in the form of long delays. This criterion was rated as moderately unfavourable.

9. Effectiveness of the projects components was assessed based on the delivery of the restructured outputs, on achievement of the direct outcomes, and likelihood of impact. The Evaluator was able to document significant qualitative and quantitative results for all Direct Outcomes. Project management, the first component, was fully achieved with the designation of project management structures and coordination teams, both in UN Environment and in the Ministry of Environment (MMA). The quality of project management and supervision is rated as 'Satisfactory' under the criterion Factors Affecting Performance (see para 5.4.10 below).

10. The second component regarding development of measures in relation to POPs wastes and contaminated sites delivered inventories and approved Action Plans on pesticide POPs, new POPs and POPs contaminated sites. The third component on development of measures in relation to PCBs delivered a PCB inventory an approved Action Plan including PCBs from the electrical utilities sector as well as the industrial and transport sectors. The fourth component on measures in relation to the unintentional production of POPs delivered a national inventory on Dioxins and Furans and an approved Action Plan to Reduce and Eliminate Emissions of Dioxins and Furans, and others u-POPs, which also included a review of BAT/BEP, and existing regulatory and monitoring capacities.

11. The fifth component, on measures in relation to national infrastructure to implement the Convention supported the development of a National POPs Information System, of a course delivered by the Environmental Body of the State of São Paulo (CETESB) in its Training Centre (as part of the Masters in Science in Environmental Management), as well as on-line (distance learning) to a total of approximately 250 alumni, of which 187 were certified. This course is now part of the ongoing educational program of CETESB[7], and a new course on PCBs is being developed following the same implementation modality. This component also delivered a Preparatory Seminar on Mobilization Strategies for implementation of the Stockholm Convention, aimed at civil society and NGOs and covering the presentation of the status of activities and discussion of strategies, and finally, a Socio-economic assessment of Implementation of the Stockholm Convention with a particular focus on U-POPs and, a cost-benefit analysis on environmental sound management of PCBs and POPs pesticides.

12. The sixth and final component covering preparation and endorsement of the National Implementation Plan delivered an initial Provisional NIP and National Report, as required under Article 15 of the Stockholm Convention; and finally the approved, adopted and submitted, National Implementation Plan.

13. Although it can be argued that the late delivery of these results should affect this rating, as well as that for Efficiency, the evaluator, based on the evidence available,

[7] *https://cetesb.sp.gov.br*

considers that these delays have in fact strengthened the country's ability to deliver results. In particular it was evidenced that the administrative hurdles played into the government's own plans to strengthen its environmental institutions and its capacities. At the time when the project was dealing with a frozen budget, and consultants were not delivering on results as expected, the ministry initiated a strong push to hire additional and highly qualified technical staff.

14. In addition, Interview data unequivocally considered this project as a success and the information presented in the relevant section (5.4.2 below) argues in favour of a highly satisfactory rating for achievement of the Outputs (leading to Outcomes), since they are the most important to attain the intermediate states i.e. Existing gaps in POPs management identified and actions to improve management in place; and, Strategy and action plan developed to reduce and eliminate listed chemicals.

15. As regards likelihood of impact, the direct Outcomes necessary for the attainment of intermediate states have been achieved, and this with the awareness and support of all stakeholders, including industry and NGOs. The MMA has assumed full ownership of the Project and has taken the lead role in this, taking on the "driver's seat position". Given the Project has achieved changes in reducing releases of POPs (and in particular PCBs), as a result of the implementation of the appropriate measures which were approved in the NIP (2015) and implemented (in relation to POPs, PCBs, and U POPs) and is considered to be aligned to contribute to the reduction of environmental and health risks, the likelihood of impact is assessed as highly likely".

16. The Evaluator was not made aware of any significant deficiencies as regards the completeness of financial information, although, overall the financial information lacks the level of detail required of current projects, but is in-line with requirements at the time of project approval. The annual Project Implementation Reviews include information about in-kind and cash co-finance, and the Final Report provided by the MMA includes a detailed summary of co-financing. This amounts to $1,552,220 , which is 10.4% above the amount committed to in the Project Document (i.e. $1,406,455).

17. Evidence suggests that the Task Manager has, at least since 2015, when quarterly reports started being prepared, a strong awareness of the current financial status of the project; the FMO has strong awareness of overall project progress when financial disbursements are made; and there is regular / frequent contact between the Task Manager and FMO. Evidence also suggests that, although financial issues might only have been addressed retrospectively, when identified by senior management/staff external to the project team, thereafter they were raised and resolved proactively. As such financial management is rated as satisfactory.

18. As regards efficiency, the Evaluator was not made aware of any concerns regarding cost effectiveness or costliness, and considers that although the project was delayed in the delivery of the expected results, these have been delivered at a reasonable cost. It is however important to note that "no cost" extensions do have an impact on the in-kind contribution of UN Environment from personnel support costs (oversight, meetings, financial/administrative) which is likely to have been higher than originally forecast. However this information was not captured in any of the documents provided to the Evaluator.

19. The project faced hurdles in the early phase of implementation as regards consensus on the role to be played by UN Environment and in particular it's Brazil Liaison Office. It is interesting to note that this is the first project where the Brazil Office was tasked with the role of Implementing Agency, and is the first cooperation agreement put in

place between UN Environment and Brazil; however operationalizing this proved long and was reportedly very complex.

20. Overall the project faced severe delays in its implementation and did not produce results within the initial time frame available (i.e. by December 2011), however the Evaluator considers that there are mitigating factors that partially account for this; these include a series of unforeseeable events including changes at the Ministry of Environment, internal delays and long response times from other ministries, clarification of the role and status of UN Environment Brazil, etc. (please refer to 5.4.10 below for details), which effectively derailed project implementation and have contributed to a seven and a half-year delay, and to what can be considered low operational efficiency.

21. Although the project was granted 6 no-cost extensions the activities have resulted in the intended Outputs, even though this did not occur within the initially planned timeframes. As already mentioned, this is not a consequence of project design, but rather of the cascading effect of a series of unplanned and unpredictable events, which were all addressed and resolved and led to the successful delivery of the intended high level result of adoption of a National Implementation Plan for Brazil. Efficiency is rated as moderately satisfactory.

22. The M&E was designed according to both the GEF and UN Environment's standard procedures for Monitoring and Evaluation in place at the time of project design (2008-2009). The logframe included "objectively verifiable indicators of achievements, sources and means of verification for the project outcomes and outputs, and the timeframe for monitoring activities" were specified in the projects Monitoring and Evaluation Plan. Organizational arrangements, responsibilities and structures for monitoring and reviewing/adapting progress of project implementation were specified in the project document and a specific budget for M&E was also indicated (US$32,000 equivalent to slightly under 1.2% of the overall budget of US$2,719,973 – which is considered very low).

23. Although the Evaluator does not consider, given the requirements in place at time of design of the project, that there are any significant weaknesses in monitoring design, the indicators were reviewed and are not considered to be SMART enough to accurately track progress towards the achievement of project outputs, nor its outcomes. Monitoring of project progress is considered to have been adequate, given most indicators were at output level and easily tracked, however, monitoring of performance (in terms of achievement of the overall project objective) was unavailable, given inadequacy of indicators.

24. As part of the supervision function for the Project, a National Coordination Group (NIP-GNC) was established. The GNC was effective at reviewing project performance and making decisions for future work plans as part of its mandate and used in particular the meetings to provide guidance and validate progress, as necessary. In addition to the GNC, Inter-institutional Technical Groups were created (GTIs), to discuss the technical aspects of the results of the inventories and information surveys. The involvement of CETESB, the environmental body of the State of São Paulo also contributed to the monitoring and reporting of the project. However reporting requirements were largely fulfilled throughout the project's life with strong co-financing support. Quarterly expenditure reports and cash advance requests, 6-monthly progress reports and annual Project Implementation Reviews (PIRs) made available to the Evaluator appear to largely have been submitted as planned.

25. The PIRs provided minimally-acceptable reporting to track progress, and were incomplete. UN Environment missed an opportunity to question progress which could have included a request for a Mid Term Evaluation, or at the very least a review, to implement remedial action,.

26. Information regarding achievement of outcomes and project objectives was not included in the PIRs, as a result of the inadequacy of the logframes indicators, and generally confused nature of the indicators, however this should have raised concerns at the level of UN Environment. Incomplete PIRs, and accepting these as such, contributed to this missed opportunity to identify solutions and/or put in place remedial actions. Overall Monitoring and reporting is rated satisfactory.

27. Overall sustainability is rated as highly likely. For socio political sustainability, based on the fact that once the NIP has been endorsed there is no dependency as regards this criterion, and given the evidence of high degree of ownership and direct alignment with national and international priorities, this is considered to be Highly Likely. The government having taken steps to not only internalize all aspects related to implementation of the Stockholm Convention, but as well having engaged in the NIP Update process has demonstrated beyond reasonable doubt that it is committed to complying with requirements of the Convention. As regards this criterion, the project is considered to have demonstrated resources and motivation to mainstream results, which indicates low to no dependency, rating it as highly likely. Finally as regards institutional sustainability, given the endorsed NIP has no dependency on this criterion, and in addition as outcomes are well on the way to being fully mainstreamed and individual and institutional capacities have been strengthened, the rating here is also Highly Likely, based on low to no dependency.

28. Finally, as regards factors and processes affecting project performance, although highly satisfactory results were achieved overall, it is evident that even if project objectives and components were clear, practical and seemed achievable within the expected time frame, external factors detailed below, and which could not have been anticipated severely affected efficient delivery and required the project to be extended on six occasions. These external and unforeseeable events hindered the implementation of early stages of the project of which the most damaging were:

    - Changes in the Ministry of Environment (including during the process leading to the 2015 impeachment of President Rousseff) which impacted implementation of most MEAs, including the NIP – “the system was paralysed on several occasions”;
    - Internal delays and long response times from the Ministry of Foreign Affairs as regards approval of the Project Document, which reportedly took 10 months;
    - Role and status of the UN Environment Brazil, and budget allocation issues also affected performance and at times Nairobi was perceived as “slow and unresponsive”, reportedly in part due to changes in the financial management system (transition from IMIS to UMOJA) and related difficulties to reconcile accounts between systems;
    - On a different note, the exchange rate also affected the project budget and available funds, which kept growing, requiring adaptive management: in 2012/13 exchange rate was 1 US$ to 1.5 Real and today 1 US$ to 4 Real. This created a virtual “surplus” of funds.

29. Responsiveness to human rights and gender equity were not a specific focus of the project, although risk of exposure to POPs is high in vulnerable communities. This said, at the time of project formulation, inclusion of gender considerations was not a specific requirement under the GEF. Gender is not an important factor in components

1 through 4 and 6, and no evidence was provided to the evaluator as to any specific gender considerations having been taken for Public Awareness and Education Programme and Materials (under component 5).

30. Although, interview data confirmed that at the time of project development and implementation there were "no specific interventions targeting women", this has reportedly changed with new interventions supporting for example the work of socially oriented institutions/foundations (i.e. Alana's work with mothers being tested for PCBs (breastmilk) in 17 states of Brazil (www.alana.org.br).

31. In light of the laudable achievements to date, and notwithstanding the external factors that could not have been anticipated and that did severely affect efficient and timely delivery of the project, the overall rating for this project is Highly Satisfactory.

Main conclusions and recommendations

Conclusion 1	**Creative use of co-financing**
	Recommendation 1:
Administrative formalities and/or constraints (no cost extensions and substantive revisions) lead to considerable delays	When possible, co-financing (cash and/or in-kind) should be mobilized concurrently to project revisions/extensions to support project continuity and avoid delays UN Environment and Government
Contributing Conclusions	**Supportive recommendations:**
Operationalizing a change of roles i.e. transferring the role of Implementing Agency to a Liaison Office proved long and complex	UN Environment should, if/when this situation newly arises, ensure that all provisions are taken to ensure that a seamless transfer of responsibilities takes place in order to minimize implementation delays
Conclusion 2	**The risk of underestimating risks**
	Recommendation 2:
Project design does not extensively explore the potential risks	The complexities of change further to planned political transitions should be acknowledged and reflected, in the expected duration of multi-year agreements UN Environment (as Implementing Agency)
Contributing Conclusions	**Supportive recommendations:**
Risks to the project (socio-political) are not fully acknowledged although they were a regular and well known part of governmental transitions Implementation time frame was not realistic	To support realistic time frames, any foreseeable change of government that coincides with the timeframe of a project must be accounted for

Lessons Learned

32. Although resolving the internal arrangements of the Implementing Agency initially delayed project implementation, these did address a direct request from the country and significantly contributed to the project's overall success; in-country presence, familiarity with local, national and regional priorities, and reduced response time are considered to have been a definite advantage;

33. Project extensions and/or Substantive Revisions are complex and generally very time consuming; these can paralyze project implementation for months;

34. Using adaptive management, good planning and if possible using the available co-financing to fund a project is a reasonable measure to avoid delays;

35. Underestimating or ignoring the cost of political transitions (in terms of time) has the potential to seriously derail effective and efficient implementation of a project.

1 Introduction

36. This report presents the findings of the Terminal Evaluation of the UN Environment project entitled "Development of a National Implementation Plan in Brazil as a first step to implement the Stockholm Convention on Persistent Organic Pollutants (POPs)" developed under the Stockholm Convention and funded by the Global Environment Facility (GEF). The overall budget for the Project at approval was of 2,719,973 USD and included a GEF Grant allocation of 1,263,518 USD.

37. The project was approved for implementation by the GEF on 3 October 2007. The project was expected to start in January of 2008 and end in December of 2009 (24 months). The project received 6 no-cost extensions, the last of which extended the duration to 9 years and 5 months (up to May 2017). The GEF Implementing Agency for the project was UN Environment and followed a national implementation modality, with the Brazilian Ministry of the Environment (MMA) as the Executing Agency.

38. The evaluation was conducted by Mr. Cristóbal Vignal, acting as International Evaluation Consultant, under the overall supervision and with the support of the UN Environment Evaluation Office. The key question of the Terminal Evaluation was whether the project has achieved or is likely to achieve the project goal of "protecting human health and the environment from persistent organic pollutants" – the principal objective of the Stockholm Convention.

39. The purpose of this full-size project was to develop the National Implementation Plan (NIP) to guide the implementation of the Convention in Brazil in accordance with the requirements of Article 7 of the Convention, taking into account the guidance adopted at the first Conference of the Parties. The NIP endorsed by the Brazilian Government represents the principal intended Output of this full-size project while the demonstrated sustainable capability to implement the Convention in Brazil is its principal Outcome.

40. Evaluations are carried out to contribute to institutional learning and to fulfill UN Environment accountability commitments. The target audience for the findings of the Terminal Evaluation includes UN Environment staff, regional and national partners and stakeholders (both at the level of the country, as well as other international partners and agencies), the Basel, Rotterdam and Stockholm Secretariat, the GEF and project managers and organizations planning the same or similar projects in Brazil and/or other regions.

41. The project contributes to the results framework of the UN Environment Programme of Work 2010-2011 (PoW 2010-2011) under Sub-programme 4 - Environmental Governance and, 5 – Harmful Substances and Hazardous Waste. The project also contributes to the results framework of the UN Environment Programme of Work 2016-2017 (PoW 2016-2017) under the Chemicals and Waste Sub-programme and corresponding Expected Accomplishment B. Finally, as regards the UN Environment Medium Term Strategy, the project directly contributed to the delivery of 2 of its cross cutting thematic priorities.

2 Evaluation Methods

2.1 Data Collection

2.1.1 Description of Evaluation methods and Information Sources

42. The Terminal Evaluation (TE) was conducted in accordance with UN Environment Evaluation Policy and the UN Environment Programme Manual. It was carried out as an independent in-depth evaluation using a participatory approach; all key parties and stakeholders associated with the project were kept informed and regularly consulted throughout the evaluation.

43. In order to determine project achievements against the expected Outputs, Outcomes and Impacts, the Evaluator used different methods to ensure that data gathering and analysis delivered evidence-based qualitative and quantitative information, obtained from a wide range of sources. These included desk review of studies and literature, individual anonymous and confidential in-depth interviews (face-to-face, Skype and/or telephone depending on quality of the Internet and available bandwidth), e-mails, and field visits. This multi-faceted approach enabled the Evaluator to explore the causal pathways followed by the intervention and to understand the reasons why certain results were achieved, or not, and to triangulate all information, contributing to a higher level of reliability in the findings.

44. The methodology included interviews with past and present UN Environment staff at HQ, Geneva, and in the field and, government representatives. In addition, initial interviews were conducted with the UN Environment Task Manager and other relevant staff members in the context of the Global Workshop from “NIPs to Implementation” held on 23 and 24 October 2018 in Montevideo, Uruguay, prior to the evaluation mission. This served to obtain complementary information on project design and implementation.

45. These interviews were semi-structured and sought to clarify the origins of the project and gather inputs from stakeholders on the institutional arrangements for implementation, achieved and expected results, strengths and weaknesses, difficulties encountered and missed opportunities. The stakeholders to interview were selected solely on the basis of their role in the project, regardless of gender, and samples were not skewed to obtain a specific number of each gender.

46. The documentation review was carried out during June of 2018 to November of 2018 and included project related documents, monitoring reports, and also contextual documents on Government policies, as well as any others considered pertinent by the Evaluator. A list of information and data sources, as well as that of interviewees in the course of preparation of this Terminal Evaluation is presented as Annex III.

47. The UN Environment Evaluation Office directly contracted the International Evaluation Consultant whose tasks were specified in the job description attached to the Evaluation ToRs (see Annex V). The Evaluator was not directly involved in the design and/or implementation of the project.

48. No major limitations were encountered, other than related to the un-timely disbursement of the funds required to carry out the field mission. This is noteworthy, but relates only to internal administrative lentitudes, and not to availability of

information, materials and stakeholders required for the successful completion of this Terminal Evaluation.

2.1.2 Selection Criteria and questions

49. The Evaluator visited Brazil in the last quarter of 2018. This mission included the cities of Brasilia (29-31 October) and Sao Paulo (1 November).

50. The Inception phase of the evaluation delivered an agreed upon methodology, and a set of questions, to assess project performance, and prior to the missions, the Evaluator with the help of the UN Environment Brasilia Office identified the stakeholders to be interviewed based on their roles. In particular he sought to interview those involved in project management, and those with institutional responsibilities related to the project (e.g. GEF Focal Point). The interviewees where identified with the support of the Executing Agency, namely the Ministry of Environment (MMA – Ministério do Meio Ambiente).

2.1.3 Data Verification

51. The interviews allowed new lines of questioning to be followed if/when necessary, particularly with regard to reconstructing the history of the project. The Evaluator conducted the interviews and notes taken and analysis were triangulated against documentary evidence. While maintaining the independence of the evaluation, the approach was participatory and open in order to facilitate cordial and constructive dialogue with all stakeholders.

2.2 Theory of Change at Evaluation

52. The Theory of Change (TOC) at Evaluation was developed in the Inception Report and was peer reviewed[8]. Changes in the design of the project that were approved throughout its duration have been included. These changes were identified from a review of the official documentation (Extensions and Substantive Revisions), annual Project Implementation Reviews (PIR), interviews with staff and relevant stakeholders. The modifications also reflect the results of the tests of the project logic during the evaluation. The Theory of Change at Evaluation is discussed in more depth in Section 4.

[8] *This was peer reviewed by UN Environment Evaluation Office at the time of approval of the Inception Report*

3 The Project

3.1 Context

53. The Stockholm Convention recognizes that Persistent Organic Pollutants (POPs) pose a major and increasing threat to human health and the environment. These pollutants possess toxic properties, resist degradation, bio-accumulate and are transported through air, water and migratory species, across international boundaries and deposited far from their place of release, where they accumulate in terrestrial and aquatic ecosystems[9].

54. Organochlorine compounds for pesticide use were first registered in Brazil in 1946 and their use increased rapidly, in particular for plant protection. Brazil restricted production, trade and use of these in the 1970's through a series of regulations, and in 1985 prohibited trade, distribution and use in agriculture, except in declared emergencies.

55. DDT was produced in Brazil from 1962 to 1982; as well, significant amounts were imported, as late as in 2001 (7 tonnes). As regards PCBs (Polychlorinated Biphenyls) although these were never produced in the country, transformers and capacitors for use in electrical supply were manufactured since the 1940's in Brazil, and imports of equipment containing PCBs were estimated to be at around 100,000 tonnes. Although their use and trade were banned in 1981, at the time of project design it was recognized that "the inventory may not capture all contaminated equipment as testing is not complete".

56. At the time of conception of the project it was also estimated that a great majority of the significant sources of unintentionally produced POPs (covered under Annex C, Part II of the Stockholm Convention) were to be found in the country. These included the incineration for disposal of a variety of industrial and medical wastes. The country was also amongst the world's largest pulp and paper producers and although this industry now uses elemental chlorine free bleaching technology, this was not the case at the time of development of the project.

57. The metallurgical industry was also estimated to be an important source of formation and release of unintentionally produced POPs. This was through the industrial production processes for iron and steel, electrolytic grade copper, aluminum, lead and zinc.

58. Overall, in 2007, Brazil was attempting to move away from a model-based estimation of U-POPs releases (Unintentionally produced POPs) by improving the availability of emissions sampling and analytical capacity and enhancing reporting requirements. As regards POPs waste and site contamination, principally related to sites of former production, formulation, storage and distribution and maintenance and disposal (for PCBs), although no systematic data existed, an inventory of potentially contaminated sites had been developed for the state of Sao Paulo [10]. This inventory was developed by CETESB, the Environmental Company of Sao Paulo, a future and important partner in the project.

[9] *Project Document, and other sources*

[10] *The Project Document states in 2007 that this inventory has been maintained "for some years"*

3.2 Objectives and Components

59. Brazil opted to pursue the development of its National Implementation Plan not through an Enabling Activities grant but through the full GEF project cycle, reflecting the scale of activities required in the country. It committed to provide financing to support significant components of the work required in the NIP development and sought the support of the GEF to ensure completion of the NIP.

60. The planned project activities aimed to remove barriers to the successful implementation of the Stockholm Convention in Brazil through actions compatible with its requirements and specific guidance documents. These activities included work to establish a detailed assessment of the country's situation with respect to POPs, combined with strategies and action plans to address priority issues, initial capacity building, and demonstration activities serving to inform action planning and prepare the way for implementation.

61. The eventual impact the project aims to achieve is that of protecting human health and the environment from persistent organic pollutants. The objective was that of developing the NIP to facilitate the implementation of the Convention in Brazil, in accordance with the requirements of Article 7, taking into account the guidance adopted at the first Conference of the Parties. The NIP endorsed by the Brazilian Government represents the principal output of this full project while the sustainable capability to implement the Convention in Brazil is described in the project document as its principal outcome.

62. To achieve these results, the activities of the project were grouped as follows:

- 1: Project Management and Supervision: "To ensure the proper management and oversight of the project and the close coordination between its national and international actors in order to deliver high-quality project outputs on time and within budget"[11];
- 2: Measures in relation to POPs wastes and sites contaminated by POPs: "To develop measures, appropriate to the obligations on Parties set out in the Convention, in relation to products and articles in use; wastes consisting of, containing or contaminated with intentionally or unintentionally produced POPs; and sites contaminated by such wastes";
- 3: Measures in relation to polychlorinated biphenyls (PCBs): "To develop measures, appropriate to the obligations on Parties set out in the Convention, in relation to polychlorinated biphenyls (PCBs)";
- 4: Measures in relation to the unintentional production of POPs: "To develop measures, appropriate to the obligations on Parties set out in the Convention, in relation to unintentionally produced POPs";
- 5: Measures in relation to national infrastructure to implement the Convention: "To develop a sustainable infrastructure enabling Brazil to implement the Stockholm Convention at Federal and state levels";
- 6: Preparation and endorsement of the National Implementation Plan: "To prepare a high-quality national plan meeting Brazil's needs to implement the Stockholm Convention and suitable for Government endorsement and transmission to the Conference of the Parties [12]".

[11] *Project Management and Supervision is considered for the purposes of this evaluation as an integral and crosscutting activity and will be evaluated as a Factor Affecting Performance.*

[12] *Project document*

63. As regards its results hierarchy, the project does not include any further levels; hence the above objectives are considered to function as outcome-level intentions, although they are not formulated as outcome statements. In addition, the logical framework does include standard elements of activities, indicators, sources of verification and, assumptions. Overall, although limited, this approach to results formulation is consistent with the project design requirements in place at the time of design of this project. Please refer to Table 5 Reconstructed Project Outputs and Outcomes at design, for more information.

3.3 Stakeholders

64. The project document recognized that the activities set out in the project would require the willing participation and coordinated efforts of a broad range of stakeholders. Although in some countries, inter-ministerial cooperation and broader coordination with civil society groups and industry is problematic, Brazil has a commission, the CONASQ (National Commission on Chemical Safety) involving over 20 government entities and NGOs, industry, civil society and academia. This body ensures the coordination of chemical safety programmes, including the implementation of multilateral environmental agreements such as the Stockholm Convention and is described in the Project Document as "a prime component of stakeholder participation".

65. For the purposes of this evaluation, the national stakeholders analysis presented in the table below includes the Ministry of the Environment (MMA) which serves as the national Executing Agency for the project the Ministry of Health, the Ministry of Labour and Employment, the Ministry of Transport, the Ministry of Agriculture, Livestock and Supply, the Ministry of Development, Industry and External Trade, the Ministry of Justice, the Ministry of Science and Technology, the Ministry of Mines and Energy, and, the Ministry of Foreign Affairs. Civil society (including consumer associations) are also considered important national stakeholders, responsible for disseminating information on POPs risks, and expressing the concerns of communities about POPs at national level. Finally, the industry sector (e.g. computer, electronics parts, furniture stores, and wire producers) are also considered key stakeholders in the NIP development.

66. Regarding women's groups, there is a reference in the Project Document which specifically states that these will be consulted to "(i) determine […] appropriate educational schemes to raise awareness of the hazard posed by inappropriate or illegal use and management of POPs chemicals (ii) devise appropriate programmes and materials to promote the safe handling of hazardous chemicals, the use of environmentally sound alternatives, integrated disease management techniques minimizing or eliminating the need for hazardous chemicals, and discouraging POPs use; (iii) conduct training programmes for key groups".

Table 2: Stakeholder Analysis

Stakeholder	Level of Interest	Level of Influence	Importance as source of information for Evaluation	Focal area for questions
International and Regional Stakeholders				
UN Environment, Economy Division[13], Chemicals and Health.				

[13] *The Economy Division was formerly known as the Division for Technology, Industry and Economics (DTIE)*

Stakeholder	**Level of Interest**	**Level of Influence**	**Importance as source of information for Evaluation**	**Focal area for questions**
Project Developer	H	H	M	Assessment of design of projects
Task Manager	H	H	H	All aspects
Project Management Staff	M	M	H	Assessment of implementation aspects
Stockholm/Basel Regional Centre	H	M	H	
Stockholm Convention Secretariat	H	H	H	
Executing Agency Staff				
Project Coordinator	H	H	H	All aspects
Finance officers	H	M	H	Efficiency aspects/financial management
Admin officers	H	M	M	Efficiency aspects
Consultants	H	H	M	Effectiveness aspects
Co-financing institutions	M	L	M	
National Stakeholders				
Government Ministries, Departments and Agencies				
POPs focal point	H	H	H	All aspects of national implementation
Members of NIP coordinating committee	M	M	M	Long-term role and assessment of current capacity for NIP implementation
National Civil Society Organizations				Their inclusion in the planning process. Unexpected outcomes. Unintended negative effects.
Representatives of women's groups	L?	L	H	Effectiveness of awareness raising and continued exposure to POPs of children and adults (male and female)
Private Sector				
Private-sector and trade organizations	L	M	L	Their inclusion in the planning process. Feasibility of NIP from their perspective.
POPs-related Industries & suppliers	M	L	M	Understand change in behaviour as a result of the project
Media Channels				
Radio, TV, print, and online journalists	M	M	H	Awareness of POPs and effectiveness of campaigns

3.4 Project Implementation Structure and Partners

67. UN Environment was the GEF Implementing Agency for the project. The UN Environment Task Manager was based in the Economy Division[14], Chemicals Branch in Geneva and was supported by the UN Environment Brazil Office (in Brasilia). The project followed a national implementation modality, with the Brazilian Ministry of the Environment (MMA) as the Executing Agency. The key national partner under the MMA was the National Chemical Safety Commission (CONASQ). The project also cooperated with multiple national and regional partners.

68. The MMA oversees the Brazilian National Environmental System and is responsible inter alia for national environmental and water resource policies; for developing strategies, mechanisms and economic and social instruments to improve the quality of the environment and natural resources; and for policies to integrate industrial production and the environment.

69. Within the MMA the Secretariat for Climate Change and Environmental Quality (SMCQ) oversees pollution; environmental degradation and hazards; environmental impacts and licensing; wastes harmful to health and the environment; urban environmental policy; and integrated management of the coastal and marine environments. Within SMCQ, the Directorate for Environmental Risks Management is responsible inter alia, as the National Technical Focal Point of the Stockholm Convention in Brazil, for coordination of its implementation; and for management of activities and personnel engaged in its implementation.

70. The National Commission on Chemical Safety (CONASQ) was established by the MMA administrative act 19/2000 as an inter-ministerial commission charged with institutional liaison and fostering discussion on chemical safety in order to implement the National Chemical Safety Programme (PRONASQ). It comprises more than 20 government and non-government institutions and plays an important role in promoting the necessary arrangements for the implementation of international chemicals agreements including the Stockholm Convention.

71. Brazil's National Implementation Plan was to be developed by a dedicated national team reporting to the Directorate for Environmental Risks Management, supported by national and international experts, as necessary, and developed in consultation with other interested Federal Ministries and CONASQ. During the Inception Workshop of the Project, held from 23 to 25 March 2010 in São Paulo, the formation of the National Coordinating Group (GNC) was approved.

72. This policy group was composed of Environment, Health, Labor, Industry and Civil Society Sectors, represented by institutions, which are CONASQ members. The GNC is a specific task group of CONASQ and included representatives of the Ministries of Environment, Health, Development Industry and Foreign Trade, Labor and Employment, the Brazilian Association of Chemical Industry, representative of Workers (Unified Workers Central), and representative of the NGO community (Brazilian Forum of NGOs and Social Movements for the Environment).

3.5 Changes in Design During Implementation

73. A project identification and PDF (Proposal Development Funds) Block B Funding Request to GEF was submitted in May 2004 for a Preparatory Project. This was designed to last 10 months (from May 2004 to February of 2005). The full PDF B

[14] *Previously Division of Technology, Industry and Economy – DTIE*

Project cost was of US$480,000 (US$350,000 from the GEF and US$65,000 each from the government of Brazil and UN Environment as in-kind contributions). Further to this it was expected that a Full Project would be developed and start in the 3rd quarter of 2004, with a duration of 2 years and a cost of between US$1,800,000 and US$2,000,000.

74. On 30 March 2005 the Preparatory Project, which had commenced in May 2004, was first revised to reflect nil expenditure in 2004, and to re-phase 2004 unspent balances of US$350,000 against respective objects of expenditure in 2005; this revision also amended the duration of the Preparatory Project and extended it from February 2005 to August 2005. Project duration was then brought up to 16 months.

75. On 27 September 2005 the Preparatory Project was again revised to reflect nil expenditures in 2005, and to re-phase unspent balances of US$350,000 against respective objects of expenditure in 2006; this revision extended the duration of the Preparatory Project to September 2006 (formerly August 2005), "in order to complete the drafting of the project brief for submission to the GEF".

76. The principal outcome of the Preparatory Project detailed above was the proposal for a GEF Full Sized Project to develop the NIP, which was approved on 3 October 2007; this was to be completed in 2 years. The resulting Project was approved and the ICA (Internal Cooperation Agreement) was signed between the Division of Global Environment Facility Coordination of UN Environment and the UN Environment-Brazil Office on 11 October 2009 and 8 December 2009, respectively. The Project officially started in Brazil with the publication of the Extract of the Technical Cooperation Agreement in the Official Gazette on December 14, 2009.

77. Substantive project revision "A" (Rev.2[15]) is dated November of 2012 and sought to extend the initial duration of the project (September 2009 to October 2011) until June 2013 "in order to achieve all goals and actions established". As well, this was approved in order to validate a new allocation of resources among different budget lines and to create 2 new budget accounts: subcontracts and, financial audit necessary for the implementing agency to proceed with project closing.

78. Substantive project revision "B" (Rev.3) is dated June 2013 and was prepared to extend the duration of the project to September 2014. This was a no cost extension required to allow the government of Brazil to finalize the NIP. This was meant to be the last extension requested with the understanding that the NIP would be ready and endorsed by September 2014. The reasons for this extension were:

    - Longer than expected administrative processes, resulting in delays in hiring consultants;
    - Lack of interest from identified candidates, forcing a re-advertisement of the positions;
    - Lengthiness of the previous extension process, which only ended in January 2013, effectively giving the project 5 months to finalize outputs; the work plan and budget approved under this previous Revision "A" had effectively become outdated;
    - The fact that contracts with organizations and institutions were not "legal", as the project had ended in June 2013.

79. This revision also reflected actual expenditures to the GEF Trust Fund of US$97,620 in 2010; US$250,739 in 2011 and expenditure credits of US$78,095 in 2012. As well,

[15] *Rev.1 is considered to be the final approved Project Document*

unspent balances from previous years were re-phased to US$688,054 in 2013 and, US$305,200 in 2014.

80. Project revision 4 (Rev.4) dated 21 September 2015 extended project duration to December 2015 and put forth the same arguments as those used for Revision "B" (Rev.3); it also reflected actual expenditures to the GEF Trust Fund of US$80,078 and ULO of 32,518 for 2013 and, US$287,054 and ULO of 273,514 in 2014.

81. Project extension 5 (Rev.5) dated 28 June 2016 set the duration of the project at 78 months (i.e. to December 2016). This as well mentioned that it would be the last extension and gave as the reason the "administrative processes that took longer than expected". It also reflected actual expenditures to the GEF Trust fund of US$292,815 in 2015 and re-phased unspent balances from previous years in the sum of US$27,034 for 2016.

82. The final project revision (Amendment No. 6/ICA), dated 28 December 2016 sought to align the completion date of the project with the Project Implementation Plan (PIP) set out under the Internal Cooperation Agreement (ICA) of 15 April 2008 between the UN Environment Economy Division and UN Environment Brazil (Executing Agency). The duration of the project was hereby set to 9 years and 3 months, with project to be completed by March 2017 (the legal validity of the instrument was shifted from December 2016 to September 2017). This final Amendment came into force on 28 December 2016 "upon the date of the last signature of the approving officials".

83. It is important to note that all of the above described revisions were at no-cost to the GEF, although this was not the case for UN Environment (see paragraph 167 below).

84. The Project, which was initially designed to be completed in 2 years, experienced considerable delays, and was in fact completed in 7 years and 5 months. Mid-term evaluations/reviews were not undertaken for this project because it was considered as a GEF Enabling Activity, which does not therefore require undertaking MTRs/MTEs. In addition, the duration of the project was originally less than four years, the threshold required for an MTR/MTE. This should have been identified in the PIRs, and remedial action should have been engaged, however the PIRs only summarily described the delays and root causes and never explicitly sought to explore and implement remedial actions (see 5.4.8 below for additional information).

Table 3: Project timeline (multiple sources)

Date	Submission/ Revision No.	Substantive Details/ Changes	Actual implementation/ Reasons for Delays/
May 2004	Submission of Preparatory Project Fund (PPF) request to GEF	10-month PPF approved, running from May 2004 to February 2005 - US$480,000 (US$350,000 GEF; US4 65,00 Brazil Govt; US$65,000 UN Environment)	
March 2005	1st revision of PPF terms	Re-phased 2004 unspent balances of US$350,00 Amended to a 16-month PPF and changed end date from Feb 2005 to August 2005.	Nil expenditure in 2004
Sept 2005	2nd revision of PPF terms	Re-phased 2005 unspent balances of US$350,00 Amended to a 16-month PPF and changed end date from August 2005 to Sept 2006.	Nil expenditure in 2005, and in order to complete the drafting of the project brief for submission to the GEF

Oct 2007	Submission of Full-Size GEF Project Proposal	2 year full-size project grant approved, running from Jan 2008 to Dec 2009 - US$ 2,719,973 (US$1,263,518 GEF; US$1456,455 expected co-financing)	Official start by Brazilian gazette notice on **Dec 14th 2009** - This delay brought official start/end dates to Sept 2009 – Oct 2011
Nov 2012	Revision 'A'	Extended end date from Oct 2011 to June 2013 Validated re-allocation among budget lines Approved creation of 2 new budget lines	In order to achieve all goals and actions established
June 2013	Revision 'B'	Extended end date from June 2013 to Sept 2014 Actual expenditure confirmed at this point as: US$97,260 in 2010 US$250,739 in 2011 Credits of US$78,095 in 2012 Balances re-phased to: US$688,054 for 2013 US$305,200 for 2014	• Longer than expected administrative processes, resulting in delays in hiring consultants; • Lack of interest from identified candidates, forcing a re-advertisement of the positions; • Lengthiness of the previous extension process, which only ended in January 2013, effectively giving the project 5 months to finalize outputs; the work plan and budget approved under this previous Revision "A" had effectively become outdated; • The fact that contracts with organizations and institutions were not "legal", as the project had ended in June 2013.
Sept 2015	Revision '4'	Extended end date from Sept 2014 to Dec 2015 Actual expenditure confirmed at this point as: US$112,596 in 2013 (GEF and ULO) US$560,568 in 2014 (GEF and ULO)	Same arguments as under Revision B
June 2016	Revision '5'	Extended end date from Dec 2015 to Dec 2016 Actual expenditure confirmed at this point as: US$292,815 in 2015 Balances re-phased as: $27,034 for 2016	Administrative processes that took longer than expected
December 2016	Revision '6'	Extended end date from Dec 2016 to March 2017	To align the project end date with the Project Implementation Plan set out in the Internal Cooperation Agreement (Govt of Brazil

			with UN Environment) of April 2008. ICA end date extended from Dec 2016 to Sept 2017
May 2017		Project reached operational completion in **May 2017.** 7 years and 5 months after start in Dec 2009	

3.6 Project Financing

Table 4: Project budget at design (multiple sources)

GEF		**1,263,518 USD**
Co-financing		
Cash	Government of Brazil	1,406,455 USD
In-kind	UN Environment	50,000 USD
	Sub-total Co-Financing	**1,456,455 USD**
	Total Project Cost	**2,719,973 USD**

85. As regards expenditures and planned/actual sources of funding and co-financing, the Evaluator did not have access to the breakdowns regarding expenditure or co-finance, and in addition the UN Environment's financial reporting system in place at the start of the project reportedly did not have the capacity to track expenditure at the component level. As such, UN Environment did not require the Executing Agency to report expenditure by component nor to confirm the sources of co-finance. The data in this section derives from the latest official information that was provided to the Evaluator.

86. Expenditures have been provided for the life of the project and reflect a total project spend of US$2,718,523. Information provided by the UN Environment-Brazil Office (dated 25 October 2018) confirms there is a remaining unspent cash balance on the GEF grant of US$1,450, while the target for securing co-finance was exceeded by US$145,765 (Final Report of the project dated September 2018 – below).

87. It is noted that the total in kind co-financing for the full project is higher than that initially foreseen (from US$1,406,455 to US$1,552,220). In addition the Brazilian Ministry of the Environment (MMA) took on board a significant portion of costs related to project coordination (line 1101), whilst minimizing the use of local technical experts and international experts (lines 1201 and 1202), as well as a marked reduction in local travel (line 1601). These actions contributed to the strengthening of the capacities of the Ministry itself and supported ownership of the project.

88. The reduced amount of resources required to hire technical consultants and for training activities is directly linked to the fact that during one particular period further detailed below, when budget execution was suspended, these activities were held with national resources.

REPORT OF PLANNED AND ACTUAL CO-FINANCE BY BUDGET LINE

Name:	Government of Brazil
Project title:	Development of a National Implementation Plan in Brazil as a first step to implement the Stockholm Convention on Persistent Organic Pollutants (POPs)
Project number:	GFL- 0061 – 4989 -2760
Project executing partner:	Ministry of Environment of Brazil
Project Durantion:	From: September 2009 To: December 2015
Project reporting period:	January 2010 - July 2017

From:	NIP/POPs Project Team	In-Kind Contribution			In Cash (USD)			Comments
To:	Jorge Ocaña	Original Bidget	Last Revision Budget	Received to date	Budget Original	Budget Last Revision	Received to Date	Received to date
	UNEP BUDGET LINE*							
1101	Consultant project coordination team	153.000,00	153.000,00	1.105.510,58	-	-	-	-
1201	Local Technical experts	767.000,00	767.000,00	155.078,70		-	-	-
1202	International experts	-		-		-	-	
1301	Consultant technical support staff	120.000,00	120.000,00	-		-	-	-
1601	Local travel on official business (local staff)	135.000,00	135.000,00	672,00	-	-	-	-
1602	Travel on official business (international staff)	6.000,00	6.000,00	1.808,67		-	-	
1999	**Total of personnel costs**	**1.181.000,00**	**1.181.000,00**	**1.263.069,95**	**-**	**-**	**-**	**-**
3201	Trainning	60.000,00	60.000,00	35.933,17	-	-	-	-
3301	Project supervisory meetings of CONASQ	6.000,00	6.000,00	-		-	-	-
3302	Project managment & task team meetings	8.500,00	8.500,00	41.759,78		-	-	-
3303	Meeting & workshop to validate project outputs	98.921,00	98.921,00	10.499,35	-	-	-	-
3999	**Total training and meeting costs**	**173.421,00**	**173.421,00**	**88.192,30**	**-**	**-**	**-**	
4101	Expendable equipment	14.052,00	14.052,00	726,22		-	-	-
4202	Non-expendable equipment	-		-		-	-	-
4999	**Total of equipment component**	**14.052,00**	**14.052,00**	**726,22**	**-**	**-**	**-**	
5101	Equipment maintenance	12.000,00	12.000,00		-	-	-	-
5201	Information dissemination, printing and translation	25.982,00	25.982,00	23.071,32		-	-	-
5301	Communication costs	-				-	-	-
5999	**Total Miscellaneous costs**	**37.982,00**	**37.982,00**	**200.231,58**	**-**	**-**	**-**	**-**
TOTAL CASH/ IN-KIND COSTS, FULL PROJECT		**1.406.455,00**	**1.406.455,00**	**1.552.220,05**	**-**	**-**	-	-

* The actual expenditures should be reported in accordance with the specific budget lines of the approved budget (Appendix 2) of the project document in Annex 1

Name:	Letícia Reis de Carvalho	Title:			Name of Project Manager:
	Authorized official of Executing Agency	Date:	08/01/2018		Signature:
Signature:					Date:

Leticia Reis de Carvalho
Mat. 2439164

4 Theory of Change at Evaluation

4.1 Reconstructed Theory of Change at Evaluation

89. The Evaluator developed a Theory of Change (ToC) of the *Project on Development of a National Implementation Plan (NIP) in Brazil as a first step to Implement the Stockholm Convention*, in order to first understand the concept behind the project and second to have an analytical tool to assess the project (Figure 1 – Theory of Change at Evaluation). The Theory of Change is based on the analysis of UN Environment documents related to the project and discussion with staff members via teleconference.

90. In particular, the ToC was developed based on the Logical Framework of the project and in addition to sources cited above; please note intermediate states are presented in the reconstructed ToC. The reconstruction was necessary to address the fact that the project did not include a ToC (not a requirement at the time of project development). In addition to this, the project only included an incomplete logical framework that required reconstruction of the Outputs and direct Outcomes in order to allow for a factual evaluation.

91. This draft Theory of Change aims to capture a complex reality in a simplified manner by identifying the fundamental logic and assumptions behind a concept; it was tested during the field missions to verify accuracy and validity.

92. The following pre-conditions, assumptions and drivers were validated during the Evaluation:

93. ***Pre-conditions (PCs)*** - need to be in place before the project can start. [16] The following pre-conditions were validated during the Evaluation:

    - PC.1: Government support and commitment at highest national level; timely and sufficient financial/human resources allocated by the Government to the project (commitment of the relevant Government Ministry or Agency is required but is not a sufficient pre-condition);
    - PC.2: Government is willing to establish the capacity necessary to take leadership for approval of the NIP;
    - PC.3: The public and private sectors are aware of, understand and are willing to support the government (ability to mobilize financial resources is required but is not a sufficient pre-condition).

94. ***Assumptions*** **-** An important element in any ToC; if these are wrong then the theory may not work or collapse entirely.[17] These are external conditions over which the project has no control and very little influence. The ToC is based on the following fundamental assumptions:

    - A.1 Government is committed and considers this intervention a national, and regional priority (reducing POPs reduces global environmental and human exposure to risks); Underlying assumption 1: National Coordinating Committee is formed, is functional and provides support; Underlying assumption 2: Co-financing is made available in a timely manner; Underlying assumption 3: Inter-

[16] *Pre-conditions can either be "in place", or "partly in place" or "not in place"*

[17] *Assumptions can either be "accurate" or "inaccurate", "realized" "not realized", "in-place" "not in place" or "uncertain"*

sectoral coordination mechanisms are put in place and supported by the government;
- A.2 Context related assumptions: political continuity.

95. ***Main drivers***[18]**–** These are external conditions over which the project has some level of control, and can influence the achievement of the next level results.

- D.1 Strategy is convincing to country
- D.2 UN Environment has the capacity and resources at HQ and at country level to support delivery of the expected results;
- D3 Pressure on government from BRS Secretariat (Basel Rotterdam and Stockholm Convention Secretariat) to comply with obligations of the Stockholm Convention
- D.4 Pressure from non-government stakeholders (including Civil Society, media and public, etc.) to address Persistent Organic Pollutants (POPs)

[18] *Drivers are external conditions that can be influenced by the Project*

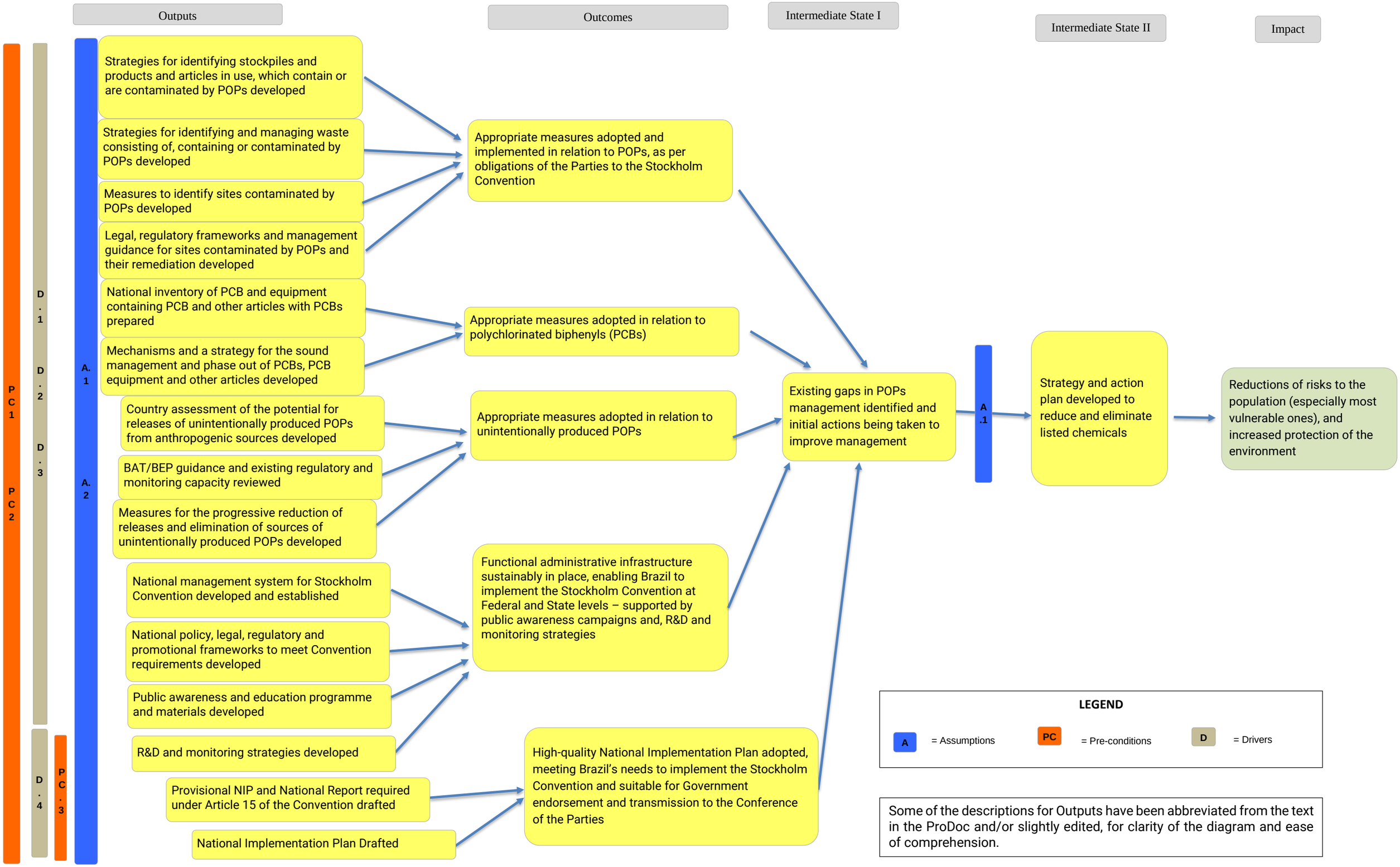
Table 5 Reconstructed Project Outputs and Outcomes at design

Component	Activities	Activities reformulated as Outputs	Objectives at design	Objectives reformulated as Outcomes
Measures in relation to POPs wastes and sites contaminated by POPs	Develop and implement strategies for identifying stockpiles and products and articles in use that contain or are contaminated by POPs	Strategies for identifying stockpiles and products and articles in use that contain or are contaminated by POPs developed	To develop measures, appropriate to the obligations on Parties set out in the Convention, in relation to products and articles in use; wastes consisting of, containing or contaminated with intentionally or unintentionally produced POPs; and sites contaminated by such wastes	Appropriate measures adopted and implemented, in relation to POPs, as per obligations of the Parties to the Stockholm Convention
	Develop and implement strategies for identifying and managing waste consisting of, containing or contaminated by POPs	Strategies for identifying and managing waste consisting of, containing or contaminated by POPs developed		
	Develop measures to identify sites contaminated by POPs	Measures to identify sites contaminated by POPs developed		
	Develop legal, regulatory frameworks and management guidance for sites contaminated by POPs and their remediation	Legal, regulatory frameworks and management guidance for sites contaminated by POPs and their remediation developed		
Measures in relation to polychlorinated	Prepare a national inventory of PCBs and equipment containing PCBs and other articles with PCBs	National inventory of PCB and equipment containing PCB and other articles with PCBs prepared	To develop measures, appropriate to the obligations on Parties set	Appropriate measures adopted in relation to

Component	Activities	Activities reformulated as Outputs	Objectives at design	Objectives reformulated as Outcomes
biphenyls (PCBs)	Develop mechanisms and a strategy for the sound management and phase out of PCBs, PCB equipment and other articles	Mechanisms and a strategy for the sound management and phase out of PCBs, PCB equipment and other articles developed	out in the Convention, in relation to polychlorinated biphenyls (PCBs)	polychlorinated biphenyls (PCBs)
Measures in relation to the unintentional production of POPs	Develop a country assessment of the potential for releases of unintentionally produced POPs from anthropogenic sources	Country assessment of the potential for releases of unintentionally produced POPs from anthropogenic sources developed	To develop measures, appropriate to the obligations on Parties set out in the Convention, in relation to unintentionally produced POPs	Appropriate measures adopted in relation to unintentionally produced POPs
	Review BAT/BEP guidance and existing regulatory and monitoring capacity	BAT/BEP guidance and existing regulatory and monitoring capacity reviewed		
	Develop measures for the progressive reduction of releases and elimination of sources of unintentionally produced POPs	Measures for the progressive reduction of releases and elimination of sources of unintentionally produced POPs developed		
Measures in relation to national infrastructure to implement the Convention	Develop and establish national management system for Stockholm Convention	National management system for Stockholm Convention developed and established	To develop a sustainable infrastructure enabling Brazil to implement the Stockholm Convention at Federal and state levels	Functional administrative infrastructure sustainably in place enabling Brazil to implement the Stockholm Conventions at Federal and State levels – supported by public awareness
	Develop national policy, legal, regulatory and promotional frameworks to meet Convention requirements	National policy, legal, regulatory and promotional frameworks to meet Convention requirements developed		

Component	Activities	Activities reformulated as Outputs	Objectives at design	Objectives reformulated as Outcomes
	Develop Public awareness and education programme and materials	Public awareness and education programme and materials developed		campaigns and, R&D and monitoring strategies
	Develop R&D and monitoring strategies	R&D and monitoring strategies developed		
Preparation and endorsement of the National Implementation Plan	Draft the provisional NIP and the National Report required under Article 15 of the Convention	Provisional NIP and National Report required under Article 15 of the Convention drafted	To prepare a high-quality national plan meeting Brazil's needs to implement the Stockholm Convention and suitable for Government endorsement and transmission to the Conference of the Parties	High-quality national plan adopted, meeting Brazil's needs to implement the Stockholm Convention and suitable for Government endorsement and transmission to the Conference of the Parties
	Draft the National Implementation Plan	National Implementation Plan Drafted		

Figure 1 Theory of Change at Design



4.2 Causal Linkages

96. The Theory of Change includes three pre-conditions that needed to be in place before the project could start [19]:

97. PC.1: Government support and commitment at highest national level; timely and sufficient financial/human resources allocated by the Government to the project (commitment of the relevant Government Ministry or Agency is required but is not a sufficient pre-condition);

98. PC.2: Government is willing to establish the capacity necessary to take leadership for approval of the NIP;

99. PC.3: The public and private sectors are aware of, understand and are willing to support the government (ability to mobilize financial resources is required but is not a sufficient pre-condition).

Outputs to Direct Outcomes

100. The delivery of the 15 Outputs leads to the achievement of one or more of the five Direct Outcomes:

- Appropriate measures adopted in relation to POPs, as per obligations of the Parties to the Stockholm Convention
- Appropriate measures adopted in relation to polychlorinated biphenyls (PCBs)
- Appropriate measures adopted in relation to unintentionally produced POPs
- Functional administrative infrastructure sustainably in place, enabling Brazil to implement the Stockholm Conventions at Federal and State levels – supported by public awareness campaigns and, R&D and monitoring strategies
- High-quality national plan adopted, meeting Brazil's needs to implement the Stockholm Convention and suitable for Government endorsement and transmission to the Conference of the Parties

101. The achievement of these Outcomes is to different extents influenced by Assumptions and Drivers, discussed below.

102. Delivery of the first 4 reconstructed Outputs contributes to the achievement of the first Direct Outcome: "Appropriate measures adopted in relation to POPs, as per obligations of the Parties to the Stockholm Convention", through the identification of stockpiles and management of waste consisting of products and articles in use containing or contaminated by POPs; by the identification of contaminated sites and the development of the necessary legal and regulatory frameworks, and management guidance.

103. Delivery of the two subsequent reconstructed Outputs contributes to the achievement of the second Direct Outcome: "Appropriate measures adopted in relation to PCBs", through preparation of a national inventory of PCB and PCB

[19] *Pre-conditions can either be "in place", or "partly in place" or "not in place"*

containing equipment and development of mechanisms and s strategy for their management and phase out.

104. Delivery of the 7th and 8th reconstructed Outputs contributes to the achievement of the third direct Outcome "appropriate measures adopted in relation to unintentionally produced POPs", through development of a country assessment of the potential for releases of U-POPs, review of BAT/BEP guidance and existing regulatory and monitoring capacity and, development of measures for the progressive reduction of releases and elimination of sources of U-POPs.

105. Delivery of reconstructed Outputs 8 to 12 contribute to the achievement of direct Outcome 4 "Functional administrative infrastructure sustainably in place, enabling Brazil to implement the Stockholm Convention at Federal and State levels", through development and establishment of national management systems, of national policy, legal and promotional frameworks to meet Convention requirements and R&D and monitoring strategies, as well as development of public awareness and education programmes.

106. Delivery of the final two reconstructed Outputs leads to the achievement of the final direct Outcome "High-quality National Implementation Plan adopted, meeting Brazil's needs to implement the Stockholm Convention and suitable for Government endorsement and transmission to the Conference of the Parties", based on and further to drafting of the provisional NIP and National Report (required under Article 15) and culminating in the preparation and subsequent adoption of the National Implementation Plan (NIP).

Direct Outcomes to Intermediate States

107. Attainment of Intermediary states I "Existing gaps in POPs management identified and actions to improve management in place" and II "Strategy and action plan developed to reduce and eliminate listed chemicals" require that all Outcomes be in place, namely adoption of appropriate measures as per the obligations of the Parties to the Convention, that appropriate measures be adopted as regards both PCBs, and U-POPs; as well as the required infrastructure to enable Brazil to implement the Convention at Federal and State level, leading to the approval of the final National Implementation Plan.

108. The successful achievement of these two Intermediary States, also influenced by the drivers described below, would lead to the sought after impact of "Reduced risks to the population and increased protection of the environment", ultimately supporting the attainment of the Conventions overarching target of saving lives.

Impact

109. The ultimate impact that the Project seeks to contribute to, links directly to the GEF Global Environmental Benefit: "**Risks from POPs to public health and the Environment are reduced**". This impact will eventually be realized when the Intermediate States I and II have had time to effectively reduce the quantities of POPs in the country and to reduce the risks of exposure, use and eventual re-use, through the successful delivery and combined results of the 15 Outputs. Its realization will also be directly influenced by the realization of the 5 Direct Outcomes, as described above.

Assumptions and Drivers

110. The review of project assumptions during the Evaluation confirmed that these were indeed central to the causal logic of the project. The commitment and ownership role taken on by the government, and the higher than initially pledged co-financing disbursed proved to be central to project success.

111. As well, the main drivers demonstrably have influence the achievement of next level results. The strategy was indeed convincing to the country; UN Environment deployed the capacity and resources at HQ and at country level to support delivery of the expected results; and the combined pressures of the BRS Secretariat and NGO stakeholders and academia were all validated as drivers during the Evaluation.

5 Evaluation Findings

5.1 Strategic Relevance

112. Brazil actively participates in all relevant international activities and instruments dealing with chemicals. It is a party to the Basel Convention on the Control and Transboundary Movements of Hazardous Wastes and their Disposal and has signed both the Rotterdam Convention on the Prior Informed Consent (PIC) Procedure for Certain Hazardous Chemicals and Pesticides in International Trade and, the Stockholm Convention on Persistent Organic Pollutants (POPs) in 2001. Furthermore it chaired the Intergovernmental Forum on Chemical Safety (IFCS) and hosted the third session of the Forum in Salvador Bahia in 2000. Both the Secretariat for Environmental Quality in Human Settlements (SQA) of the Ministry of Environment and the Ministry of Foreign Relations (MRE) host together Brazil´s focal points for every Convention and IFCS, responding respectively for the operational and political aspects.

5.1.1 Alignment to UN Environment Mandate, Medium Term Strategy and Thematic Priorities

113. The project contributes to the results framework of the UN Environment Programme of Work 2010-2011 (PoW 2010-2011) under Sub-programme 4 - Environmental Governance and, 5 – Harmful Substances and Hazardous Waste. Under Sub-programme 4, the project is directly in-line with Expected Accomplishments A (achieving synergies and demonstrating increasing coherence in international decision-making processes) and B (strengthened capacity of States to implement environmental obligations, including integration of Gender equity principles). Under Sub-programme 5 these interventions address Expected Accomplishments A (mainstreaming sound management of chemicals into development policies, primarily in LDCs); B (support in setting the international environmental chemical and waste agenda) and, C (support implementation of multilateral environmental agreements at the national and regional levels).

114. The project also contributes to the results framework of the UN Environment Programme of Work 2016-2017 (PoW 2016-2017) under the Chemicals and Waste Sub-programme and corresponding Expected Accomplishment B (Countries, including major groups and stakeholders, increasingly use the scientific and technical knowledge and tools needed to implement the sound management of chemicals management and the related multilateral environmental agreements). The respective PoW Output in number 4 – Scientific and technical services delivered through multi stakeholder partnerships, to build the capacities of governments, the private sector and civil society to take action on the risks posed by chemicals including those listed in relevant MEAs.

115. As regards the UN Environment Medium Term Strategy, the project directly contributed to the delivery of 2 of its cross cutting thematic priorities[20] [21]: d) Environmental governance (supporting States to increasingly implement environmental obligations and achievement of priority goals); and, e) Harmful

[20] *Medium-term Strategy for 2010-2013 - UNEP (DEPI)/RS.10 /3*

[21] *To implement its Medium Term Strategy, UN Environment was to actively reach out to "Governments, other United Nations entities, international institutions, secretariats of multilateral environmental agreements, civil society, the private sector and other relevant partners"*

substances and hazardous waste (to minimize impact on the environment and human beings).

116. Work under the Environmental Governance priority aimed to improve coherence and cooperation among environment related mechanisms in order to strengthen environmental governance at country, regional and global levels to address environmental priorities. This included supporting governments to "establish, implement and strengthen processes, institutions, laws, policies and programmes, as well as working with UN entities, international institutions, regional environmental bodies" and others "to increase mainstreaming of environment into other sectoral processes and policies, including at the country level".

117. Work under the harmful substances and hazardous waste priority aimed to support the development and evolution of internationally agreed chemical management regimes, and assist countries in increasing capacities for sound management of chemicals, including supporting initiatives targeting chemicals covered by multilateral environmental agreements. UN Environment aimed to increase capacities and financing in support of reduced risks to human health and the environment and, for development of policy and control systems in line with States' international obligations.

5.1.2 Alignment with the Stockholm and Basel Conventions

118. The provisions of the Stockholm Convention (Annex A, Part II, e), require that parties make determined efforts designed to lead to the environmentally sound management of POPs. The National Implementation Plans that are being undertaken in signatory countries are aimed at enabling these to prepare for the implementation of the main provisions of the convention, in particular concerning the development of national strategies and action plans[22].

119. The Basel Convention, as called for within the Stockholm Convention (Art. 6.2)[23], has developed guidance documents on the environmentally sound management of POPs as waste, as well as PCBs. In this regard, the Basel Convention adopted the 'General technical guidelines for the environmentally sound management of wastes consisting of, containing or contaminated with persistent organic pollutants' and the 'Technical guidelines for environmentally sound management of wastes consisting of, containing or contaminated with polychlorinated biphenyls, polychlorinated terphenyls or polybrominated biphenyls'. These establish concentrations levels above which PCB wastes should be destroyed or otherwise disposed of in an environmentally sound manner.

120. The Project is fully aligned with both Conventions and will further more support countries in their phase-out and elimination process to comply with the Basel

[22] Specifically, the Stockholm convention as per Annex A, Part II, requires that: Each Party shall: (a) With regard to the elimination of the use of polychlorinated biphenyls in equipment (e.g. transformers, capacitors or other receptacles containing liquid stocks) by 2025, subject to review by the Conference of the Parties, take action in accordance with the following priorities: (i) Make determined efforts to identify, label and remove from use equipment containing greater than 10 per cent polychlorinated biphenyls and volumes greater than 5 liters; (ii) Make determined efforts to identify, label and remove from use equipment containing greater than 0.05 per cent polychlorinated biphenyls and volumes greater than 5 liters; (iii) Endeavour to identify and remove from use equipment containing greater than 0.005 percent polychlorinated biphenyls and volumes greater than 0.05 liters.

[23] In accordance as well with decisions V/8 and VI/23 of the Conference of the Parties (COP) to the Basel Convention I/4, as well as INC-6/5 and INC-7/6 of the Stockholm Convention

Convention which stipulates that any transboundary movement of hazardous wastes (export/import/transit) is permitted only when the movement itself and the ultimate disposal of the concerned hazardous wastes can take place in an environmentally sound manner and, if the State of export does not have the technical capacity and the necessary facilities for the environmentally sound management of the hazardous waste in question.

5.1.3 Alignment to Regional, Sub-regional and/or National Environmental Priorities

121. The stated goal of the Project was to protect human health and the environment from the threat of POPs controlled under the Stockholm Convention (SC) by contributing to the development and eventual implementation of a National Implementation Plan (NIP).

122. The long-term development objective of the Project is to accelerate the withdrawal of POPs and of PCBs, in compliance with the Stockholm Convention and the Basel Convention. This is also aligned with regional intervention priorities such as those of the GEF (see below, 5.1.5).

123. The project objective is to enhance the capacity of Brazil in planning and implementing national policies for the environmentally sound management of POPs and PCBs, in the context of the Stockholm Convention and the Basel Convention. These actions are required, in support of the countries national priorities, as set out in their respective NIPs.

5.1.4 Alignment to Target Group and Beneficiary Needs and Priorities

124. This project contributed to achieving improved regulatory mechanisms in Brazil; it was, in essence, a capacity building project that targeted the federal and provincial governments, the private sector, academia, as well as civil society.

125. The project executed activities on several levels from provincial level staff, national level environment officers and the Ministerial level. Differing strategies were used to communicate with each of these groups.

126. The Evaluator met with stakeholders and relevance to target groups was made clear and the interviews provided ample evidence that stakeholder groups had been reached and demonstrated a good to very good understanding of the issues at hand. Interviews provided ample opportunity for the Evaluator to confirm that, without exception, stakeholders considered the project to be of high relevance.

5.1.5 Alignment to GEF Strategic Priorities

127. The GEF Operational Programme 14 on POPs provides for three types of activities that are eligible for GEF funding on the basis of incremental costs, noting that assistance for these activities focus primarily on the national level, and also, to a lesser extent, on regional and global activities. The project fits fully under the umbrella of two of the activities eligible for GEF funding, capacity building and on the ground interventions.

128. These interventions were also aligned with GEFs goal “to promote the sound management of chemicals throughout their life-cycle in ways that lead to the minimization of significant adverse effects on human health and the global

environment." Specifically, the project was aligned with POPs- Strategic Program 1 (SP1), strengthening capacities for NIP development and implementation, and Strategic Program 2 (SP2), partnering in investments for NIP implementation. This Project also contributes to Priority 2 as regards implementation of policy and regulatory reforms. In addition, the project contributed to sound chemicals management and POPs use and release reduction objectives.

5.1.6 Complementarity with Existing Interventions

129. As mentioned previously (para 90 above), Brazil has opted to pursue the development of its National Implementation Plan not through an Enabling Activities grant but through the full GEF project cycle. Its successful results have reportedly served as a model for other developing countries in the region that have participated in a number of Workshops and training courses organized by CETESB (Environmental Body of the State of São Paulo). Reports that this has led to the establishment of a network of Focal Points for the Stockholm Convention, which now includes approximately 30 countries, were confirmed during the evaluation. Other ongoing activities were also reported and confirmed to have been taken into consideration, such as the UNDP PCB project; in this case the NIP team officially invited the project coordinator to their regular meetings.

130. In addition, complementarities were sought with the GEF/UN Environment Global Project on the Updating of National Implementation Plans for POPs, as well as with the GEF /World Bank project entitled 'National Programme for the Integrated Management of Contaminated Sites'. This project was principally geared towards the establishment of a sustainable financial mechanism supporting remediation and for pilot remediation at selected demonstration sites. UN Environment and the World Bank were reported to have collaborated closely with Brazil during implementation [24], and this was described as having been facilitated by the fact that both projects fell under the purview of the SMCQ (the Secretariat for Climate Change and Environmental Quality) of the Ministry of Environment.

5.1.7 UN Environment Capacity Building and South-South Cooperation policies

131. Alignment with the Bali Strategic Plan for Technology Support and Capacity Building (BSP) is considered to have been strong as this intervention was essentially of an enabling and capacity-building nature and included activities geared towards facilitating implementation of the Stockholm Convention. The project is considered relevant and consistent with the Bali Strategic Plan for Technological Support and Capacity Building as it supported a more coherent and effective delivery of capacity building and technical support, in particular as regards establishment of national inventories and action plans.

132. Finally, for South-South Cooperation, the project included a number of sub-regional networking and training activities. Evidence suggests that these activities have facilitated South-South cooperation and interview data confirms that the meetings where highly appreciated by participants and allowed for cross-fertilization and sharing of experiences. As such it is considered that the project is aligned with UN Environment South-South cooperation policies.

[24] *Interview data confirmed this*

133. Considering all the above, and as per the UN Environment Evaluation Criteria Matrix, the Project is rated Highly Satisfactory as regards strategic relevance.

Strategic Relevance rated 'Highly Satisfactory'

5.2 Quality of Project Design

Strengths and Weaknesses

134. The quality of project design is considered to be satisfactory, however the project's logical framework is weak; at the "objective" level, it only shows the activities, plus indicators of achievement, sources of verification and, assumptions. The "objectives" have been poorly formulated and are actually outcomes. Likewise, activities are actually outputs and indicators of achievement describe the activities to be undertaken. The Evaluator has built a Theory of Change reconstructing outputs, outcomes, intermediate states and impacts.

135. The Project's design is appropriate for its period, however design requirements have evolved in the last decade. In this sense, as the project was extended on numerous occasions, it is considered that it would have benefitted from a review/revision – further or as a condition - for these extensions to be granted. This would have brought the design up-to-date with current UN Environment policies[25]. No other major issues were flagged with project design; this said, the document could have benefitted from a more in-depth description regarding the actual project preparation; strategic relevance; intended results and causality; and most importantly risk identification.

136. Finally, although political stability is not considered a risk in Brazil, numerous and frequent changes in leadership are generally accepted as normal. Although impossible to predict, this should have been better reflected in the ProDoc, and the delays partly attributable to this factor, could have been expected if not foreseen, possibly contributing to the extension of the initial and ambitious timeframe (2 years) to develop, approve and submit the NIPs. Although adaptive management contributed to the eventual (but delayed) success of this project, it is evident that the implementation timeframe could have been tailored to better take into account national realities.

137. This criterion is rated using the Template for the Assessment of Project Design.

Quality of Project Design rated 'Satisfactory'

5.3 Nature of External Context

138. Although different country specific events occurred during the period of implementation of this Project and did have an impact on implementation, in general this criterion is not considered to have had a significant negative effect on delivery of the expected Outputs.

[25] *Human Rights and Gender and Environmental, Social and Economic Safeguards, for example*

139. Brazil was impacted at different times by unforeseeable external events, which included a political context which "intermittently or partially affected project operations to a moderate extent (e.g. national/local elections)". However, these, in general, are considered to have been a moderate threat to project implementation.

140. As regards climatic events, in general the sub-region is considered to be subject to largely predictable disasters or changes, in some cases these could be considered to have had intermittent or partial effects on project operations.

141. Regarding the security situation, social or economic issues or changes, these occasionally challenged project implementation (economic issues) but mitigation strategies, including hiring of permanent ministry staff, adaptive management, mobilization of co-financing to ensure continuation of activities, etc. were in general successfully developed, although they cost the project in the form of long delays.

142. Using the UN Environment's Evaluation Criteria rating Matrix[26], this criterion is considered to be Moderately Unfavourable.

Nature of External Context rated 'Moderately Unfavourable'

5.4 Effectiveness

143. Effectiveness was assessed on the delivery of the restructured Outputs as at 17 May 2017 (reconstructed based on the project documentation), on the achievement of Outcomes and, the likelihood of Impact. A summary of the delivery of the Project's Outputs is presented below. The delivery of key Outputs, or progress towards their delivery by project closure is also presented.

5.4.1 Delivery of Outputs (reconstructed at evaluation)

144. The first component – Project Management and Supervision – although not covered independently, but as a crosscutting activity, was fully achieved with the designation of project management structures and coordination teams, both in UN Environment and in the Ministry of Environment (MMA). The quality of project management and supervision is rated as 'Satisfactory' under the criterion Factors Affecting Performance (see para 5.4.10 below).

145. The second component - Measures in relation to POPs wastes and contaminated sites by POPs" - included development of the following outputs: Strategies for identifying stockpiles and products and articles in use that contain or are contaminated by POPs; Strategies for identifying and managing waste consisting of, containing or contaminated by POPs; Measures to identify sites contaminated by POPs; and, Legal, regulatory frameworks and management guidance for sites contaminated by POPs and their remediation. This second component is considered to be fully completed, as detailed below[27]:

- The inventories of pesticide POPs, new POPs and POPs Contaminated Sites were developed, presented and discussed in an Inter-institutional Technical Working Group (GTI) meeting (March, 2014) and the final versions were

26 UN Environment's Criteria Ratings Matrix version dated 20 November 2017

[27] All referenced publications were either made available in hard-copy or, presented to the evaluator in their final electronic form, and are available on-line: http://www.mma.gov.br/seguranca-quimica/convencao-de-estocolmo

discussed and approved in a National Coordination Group (GNC) meeting (April, 2014);
- The Action Plans on pesticides POPs, new POPs and POPs Contaminated Sites were developed, and were validated in a GTI meeting (August, 2014) and approved in a GNC meeting.

146. The third component - Measures in relation to polychlorinated biphenyls (PCBs)- required development/preparation of the following outputs: National inventory of PCB and equipment containing PCB and other articles with PCBs; and, Mechanisms and a strategy for the sound management and phase out of PCBs, PCB equipment and other articles. This third component is also considered to have been fully achieved as the following have been delivered[28] [29]:

- The inventory of PCBs (including the Electricity Sector [30]) was developed, presented and approved by the Inter-institutional Technical Working Group (GTI) (March, 2014) and was approved by the National Coordinator Group (GNC) meeting (April, 2014);
- The PCB Action Plan, which includes PCBs from the electrical utilities sector as well as the industrial and transport sectors was developed, and validated in a GTI meeting (August, 2014) and subsequently approved by the GNC.

147. The fourth component - Measures in relation to the unintentional production of POPs – included the following outputs: Country assessment of the potential for releases of unintentionally produced POPs from anthropogenic sources; Review of BAT/BEP guidance and existing regulatory and monitoring capacity; and, Measures for the progressive reduction of releases and elimination of sources of unintentionally produced POPs. This component is also considered to have been fully completed as detailed below[31]:

- The national inventory on Dioxins and Furans was developed and approved[32];
- The Action Plan to Reduce and Eliminate Emissions of Dioxins and Furans, and others u-POPs was developed, presented and discussed in an Inter-institutional Working Group (GTI) meeting (March, 2014) and the resulting version was discussed and approved by the National Coordinator Group (GNC) (April, 2014); this included a review of BAT/BEP, and existing regulatory and monitoring capacities.

148. The fifth component - Measures in relation to national infrastructure to implement the Convention – included the following outputs: National management system for Stockholm Convention; National policy, legal, regulatory and promotional frameworks to meet Convention requirements; Public awareness and education programme and materials; and, R&D and monitoring strategies. These have all been fully achieved:

- The National POPs Information System was developed[33];

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[28] All referenced publications were either made available in hard-copy or, presented to the evaluator in their final electronic form, and are available on-line: http://www.mma.gov.br/seguranca-quimica/convencao-de-estocolmo

[29] The inventories and action plans were developed by the MMA using the co-finance contribution, as referenced in the previous footnote,

[30] Which was developed previously (in 2012) by the Brazilian Electricity Regulatory Agency (ANEEL)

[31] All referenced publications were either made available in hard-copy or, presented to the evaluator in their final electronic form, and are available on-line: http://www.mma.gov.br/seguranca-quimica/convencao-de-estocolmo

[32] http://www.mma.gov.br/images/arquivo/80104/Livro_Inventario%20Dioxinasf_web%20-%20ISBN978-85-7738-180-7.pdf

[33] This is still being fine-tuned and technological issues are being resolved as they arise

- An on line course on the Stockholm Convention and POPs was developed and evidence provided to the evaluator confirms that in 2015 it was delivered by the Environmental Body of the State of São Paulo (CETESB) in its Training Centre (as part of the Masters in Science in Environmental Management), as well as on-line (distance learning) to a total of approximately 250 alumni, of which 187 were certified. This course is now part of the ongoing educational program of CETESB[34], and a new course on PCBs is being developed following the same implementation modality[35];
- A Preparatory Seminar on Mobilization Strategies for implementation of the Stockholm Convention, aimed at civil society and NGOs and covering the presentation of the status of activities and discussion of strategies was held in Brasília (August 2014). Participants included 10 representatives of civil society;
- Finally a Socio-Economic Assessment of Implementation of the Stockholm Convention with a particular focus on U-POPs and, a cost-benefit analysis on environmental sound management of PCBs and POPs pesticides was developed.

149. The sixth component - Preparation and endorsement of the National Implementation Plan – included drafting of the following outputs: Provisional NIP and National Report required under Article 15 of the Convention; and, National Implementation Plan. Both have been fully achieved. The final version of the NIP was translated in March 2014 and submitted for endorsement of stakeholders during the final project workshop. It was transmitted to the Convention Secretariat in April of 2015.

150. Although it can be argued that the late delivery of these results should affect this rating, as well as that for Efficiency, the evaluator, based on the evidence available, considers that these delays have in fact strengthened the country's ability to deliver results. In particular it was evidenced that the administrative hurdles played into the government's own plans to strengthen its environmental institutions and its capacities. At the time when the project was dealing with a frozen budget, and consultants were not delivering on results as expected, the ministry initiated a strong push to hire additional and highly qualified technical staff.

151. Interview data unequivocally considers this project as a success and the paragraphs above argue in favour of a high rating for achievement of the Outputs (leading to Outcomes), since they are the most important to attain the intermediate states i.e. Existing gaps in POPs management identified and actions to improve management in place; and, Strategy and action plan developed to reduce and eliminate listed chemicals.

152. In addition, interview data also evidenced the fact that delivery of all of the above outputs has contributed to the reduction of releases of POPs. Although information that would allow for the quantification of these was not provided to the evaluator, it does seem logical that if a country develops, approves, implements and streamlines the instruments necessary to comply with the Stockholm Convention, reductions of releases will follow, which is the intended result.

[34] *https://cetesb.sp.gov.br*

[35] *This course is designed for environmental staff of all of the Brazilian States*

The rating for delivery of Outputs is 'Highly Satisfactory'

5.4.2 Achievement of Direct Outcomes[36]

153. At the national level CONASQ addresses the main chemicals management issues and this POPs project has provided the opportunity to present progress achieved and raise awareness on POPs management. This process also contributed to the reinforcement of national capacities in terms of training and knowledge and finally supported the Government of Brazil in identifying and addressing the main issues of concern regarding POPs management and to prepare sound actions to streamline those priorities into the governments priorities and policies.

154. Evidence indicates that all of the Direct Outcomes (below) have been achieved, and this statement is strongly supported by the achievement of the Outputs described above. Brazil has effectively reinforced its existing national capacity to eliminate and manage POPs through adopted policies, strengthened permanent programmatic capacities (technical staff), and streamlining of mechanisms and requirements to address obligations towards the Stockholm Convention, including building and supporting permanent coordination mechanisms and task teams that met and continue to meet regularly[37].

Appropriate measures adopted and implemented, as per obligations of the Parties to the Stockholm Convention

Appropriate measures adopted in relation to polychlorinated biphenyls (PCBs)

Appropriate measures adopted in relation to unintentionally produced POPs

Functional administrative infrastructure sustainably in place, enabling Brazil to implement the Stockholm Convention at Federal and State levels – supported by public awareness campaigns and, R&D and monitoring strategies

High-quality national plan adopted, meeting Brazil's needs to implement the Stockholm Convention and suitable for Government endorsement and transmission to the Conference of the Parties

155. Given the above, and considering in addition that Assumptions and Drivers supporting progress and transition, from Outputs to Outcomes are in place, the rating for Achievement of Outcomes is Highly Satisfactory.

The rating for achievement of Outcomes is 'Highly Satisfactory'

5.4.3 Likelihood of Impact

156. As detailed above, the direct Outcomes necessary for the attainment of intermediate states have been achieved, and this with the awareness and support of

[36] *The evaluation assesses the achievement of the reconstructed outcomes from the TOC at evaluation*

[37] *These regular meetings are normally organized back to back with those of the National Commission on Chemical Safety (CONASQ)*

all stakeholders, including industry and NGOs. The MMA has assumed full ownership of the Project and has taken the lead role in this, taking on the "driver's seat position".

157. Assumptions and Drivers, respectively for progress from direct Outcomes, and to support transition from direct Outcomes to Intermediate States, are considered to hold, and finally, the Project has delivered all results, and Outcomes have been reached. The intermediate states have been achieved and therefore already contributing to the sought after reduction of risks to the population and increased protection of the environment.

158. In addition, intermediate states considers the fact that the measures designed to move towards the sustainable, effective and comprehensive enforcement of Stockholm Convention provisions are well under way, and have produced results as the NIP has been developed, approved and adopted. Evidence also demonstrates that there is a willingness to continue in this direction (NIP update ongoing), as Stockholm Convention related activities have been streamlined into the governments permanent structure. As such the progress towards intermediate states is achieved.

159. Finally, as the Project has achieved changes in reducing releases of POPs (and in particular PCBs), as a result of the implementation of the appropriate measures which were approved in the NIP (2015) and implemented (in relation to POPs, PCBs, and U POPs) and is considered to be aligned to contribute to the reduction of environmental and health risks, the likelihood of impact is assessed, as per the Evaluation Criteria Matrix, as "Highly Likely".

The Rating for Likelihood of Impact is 'Highly Likely'

5.4.4 Financial Management

Completeness of project financial information

160. Consideration is given to the financial information at the project level provided by the Executing Agency to UN Environment. It must be noted that all financial information submitted to UN Environment and the GEF by the UN Environment-Brazil Office, is co-signed by the Environment Ministry of Brazil.

161. The Evaluator was not made aware of any significant deficiencies as regards the completeness of financial information. High level project budgets by funding source were available sub-criteria (a) and (b); as well as disbursement documents (c); detailed project budgets for secured funds (d); project expenditure sheets were made available to the Evaluator up to 2015. A final project co-financing sheet at time of project closure is available as part of the Final Report, submitted by the MMA to UN Environment (September 2018 – see 3.6 above). However, as also pointed out in the previously mentioned section, overall the financial information lacks the level of detail required of current projects, but is in-line with requirements at the time of project approval. See also summary table in Annex II.

162. Proof/report of delivery of in-kind contributions: The annual Project Implementation Reviews include information about in-kind and cash co-finance, and the above mentioned Final Report provided by the MMA includes a detailed summary of co-financing. This amounts to $1,552,220, which is 10.4% above the amount committed to in the Project Document (i.e. $1,406,455)

Completeness of project financial information is rated as "Satisfactory"

Communication between finance and project management staff

163. Evidence suggests that the Task Manager has, at least since 2015, when quarterly reports started being prepared, *a strong awareness of* the current financial status of the project; the FMO has *strong awareness* of overall project progress when financial disbursements are made; and there is *regular / frequent* contact between the Task Manager and FMO.

164. Evidence also suggests that, although financial issues might only have been addressed retrospectively, when identified by senior management/staff external to the project team, thereafter they were raised and resolved proactively.

165. No evidence was provided to assess whether "all narrative and financial reports were reviewed by *both* finance and project staff members prior to submission".

Communication between finance and project management staff is rated as 'Satisfactory'.

166. Based on the above, financial management is rated as Highly Satisfactory.

Financial Management Rated 'Satisfactory'

5.4.5 Efficiency

167. The Evaluator was not made aware of any concerns regarding cost effectiveness or costliness, and considers that although the project was delayed in the delivery of the expected results, these have been delivered at a reasonable cost. It is however important to note that "no cost" extensions do have an impact on the in-kind contribution of UN Environment from personnel support costs (oversight, meetings, financial/administrative) which is likely to have been higher than originally forecast. However this information was not captured in any of the documents provided to the Evaluator.

168. The project faced hurdles in the early phase of implementation as regards consensus on the role to be played by UN Environment and in particular it's Brazil Liaison Office[38]. It is interesting to note that this is the first project where the Brazil Office was tasked with the role of Implementing Agency, and is the first cooperation agreement put in place between UN Environment and Brazil; however operationalizing this proved long and was reportedly very complex. It involved determining the legal structure and agreements to transfer a role traditionally played by UNDP to UN Environment and in particular the Brazil Office. This process also reportedly created "some tensions with UNDP".

169. It was also reported that UN Environment Nairobi initially "strongly disagreed" with the automatic transfer of the Executing Agencies fee (10%), and this created additional delays requiring complex discussions, which were ultimately resolved with the support of the Project Manager at Headquarters. This process, combined with the time the country required to endorse the Project Document delayed the project by one full year (2009).

170. Project extensions requests can also result in delays, as for example in 2012. This occurred further to lengthy negotiations of one of the Substantive Revisions (for

[38] *Traditionally this played the role of Liaison Office, with all substantive and administrative decision relayed to the UN Environment Regional office in Panama*

administrative and political reasons), during which time GEF funds were unavailable. Although this could have had far more serious consequences, to avoid further delays the country opted to fast-track and co-finance PCB related activities under the Project.

171. This also coincided with – and indirectly contributed – to the strengthening of the capacities of the Ministry of the Environment (MMA) which, further to the lack of available national consultants in this specialized area decided to hire specialized staff. This "understaffing" and/or lack of national capacity, had in fact already forced a series of implementation delays, as a number of the calls for proposals had had either to be deserted, or cancelled further to non-delivery of expected high-quality results.

172. The new MMA staff started to come on board at the end of 2011, with what were described during interviews as "very high technical capacities" and rather than allow the project to come to a standstill, the government opted to co-finance the on-going activities, while the issue of the Revision was being finalized. A rather fortunate turn of events, in the sense than rather to rely on external support, the country opted to internalize costs by bringing on the necessary capacities to complete and deliver on the Project results.

173. The project faced severe delays in its implementation and did not produce results within the initial time frame available (i.e. by December 2011), however the Evaluator considers that there are mitigating factors that partially account for this; these include a series of unforeseeable events including changes at the Ministry of Environment, internal delays and long response times from other ministries, clarification of the role and status of UN Environment Brazil, etc. (please refer to 5.4.10 below for details), which effectively derailed project implementation and have contributed to a seven and a half-year delay, and to what can be considered low operational efficiency.

174. Although the project was granted 6 no-cost extensions the activities have resulted in the intended Outputs, even though this did not occur within the initially planned timeframes. As already mentioned, this is not a consequence of project design, but rather of the cascading effect of a series of unplanned and unpredictable events, which were all addressed and resolved and led to the successful delivery of the intended high level result of adoption of a National Implementation Plan for Brazil.

Efficiency is rated as 'Moderately Satisfactory'

5.4.6 Monitoring Design and Budgeting

175. The M&E was designed according to both the GEF and UN Environment's standard procedures for Monitoring and Evaluation in place at the time of project design (2008-2009). The logframe included "objectively verifiable indicators of achievements, sources and means of verification for the project outcomes and outputs, and the timeframe for monitoring activities" were specified in the projects Monitoring and Evaluation Plan.

176. The organizational arrangements, responsibilities and structures for monitoring and reviewing/adapting progress of project implementation were specified in the project document. The project also identified a specific budget for M&E. This dedicated budget for monitoring covered monitoring activities, indicated data collection methods and frequency, and included funds for a Terminal Evaluation. The budget was of US$32,000 equivalent to slightly under 1.2% of the overall budget of US$2,719,973 – which is considered very low.

177. Although the Evaluator does not consider, given the requirements in place at time of design of the project, that there are any significant weaknesses in monitoring design, the indicators were reviewed and are not considered to be SMART enough to accurately track progress towards the achievement of project outputs, nor its outcomes.

5.4.7 Monitoring of Project Implementation

178. A Monitoring system was put in place at the level of the Executing Agency, in line with its own standards and evidence suggests that this allowed the person responsible for monitoring progress against indicators to track results and progress toward project objectives. Interview data confirms that this system was considered to be fully functional and ensured "total transparency of project activities and budgets".

179. Monitoring of project progress is considered to have been adequate, given most indicators were at output level and easily tracked, however, monitoring of performance (in terms of achievement of the overall project objective) was unavailable, given inadequacy of indicators.

180. As part of the supervision function for the Project, a National Coordination Group (NIP-GNC) was established. The GNC was effective at reviewing project performance and making decisions for future work plans as part of its mandate and used in particular the meetings to provide guidance and validate progress, as necessary. In addition to the GNC, Inter-institutional Technical Groups were created (GTIs), to discuss the technical aspects of the results of the inventories and information surveys.

181. The involvement of CETESB, the environmental body of the State of São Paulo also contributed to the monitoring and reporting of the project. As part of its responsibilities. CETESB, as the Stockholm Convention's Regional Centre for Latin America and the Caribbean, provided support and developed an on-line introductory course to the Stockholm Convention and conducted 3 face-to-face training sessions for developing countries and Brazilian environmental state agencies.

5.4.8 Project Reporting

182. As mentioned above, the budget is considered to have been low to carry out M&E activities as presented in the project document however reporting requirements were largely fulfilled throughout the project's life with strong co-financing support. Quarterly expenditure reports and cash advance requests, 6-monthly progress reports and annual Project Implementation Reviews (PIRs) made available to the Evaluator appear to largely have been submitted as planned.

183. The PIRs provided minimally-acceptable reporting to track progress, and were incomplete. UN Environment missed an opportunity to question progress which could have included a request for a Mid Term Evaluation, or at the very least a review, to implement remedial action,.

184. Information regarding achievement of outcomes and project objectives was not included in the PIRs, as a result of the inadequacy of the logframes indicators, and generally confused nature of the indicators, however this should have raised concerns at the level of UN Environment. Incomplete PIRs, and accepting these as such, contributed to this missed opportunity to identify solutions and/or put in place remedial actions.

185. As per the UN Environment Weighting for Ratings table, the rating for this criteria should be "Highly Satisfactory", however the evaluator considers that, notwithstanding the final project results, this is not appropriate and does not accurately reflect reality regarding in particular reporting gaps. As such, the rating for Monitoring of project implementation is lowered to "Satisfactory" [39]

Monitoring and Reporting Rated 'Satisfactory'

5.4.9 Sustainability

Socio-political sustainability

186. Overall, the Evaluator considers that socio-political sustainability is highly likely, based on the fact that once the NIP has been endorsed there is no dependency as regards this criterion. Before adoption of the NIP, there is a need for socio-political support, but given the evidence of high degree of ownership and direct alignment with national and international priorities, this is considered to be Highly Likely (Low to no dependency, 100% mitigation). Socio Political Sustainability is rated "Highly Likely"

Socio-political Sustainability rated "Highly Likely"

Financial Sustainability

187. Overall, the success of this project depended first and foremost on the "Development of a National Implementation Plan as a first step to implement the Stockholm Convention", and it then follows that sustainability would depend on the commitment of the country and its national Executing Agency to ensure that the necessary provisions for mainstreaming and implementation of the Convention were strongly supported. In this sense, continuity and sustainability of the project depends on the commitment of the country to provide the necessary long-term resources, both financial and human.

188. In strict financial terms, sustainability, after GEF involvement ceases, depends on the importance attached to future actions related to the implementation of the country's NIP and to Stockholm Convention obligations. The government having taken steps to not only internalize all aspects related to implementation of the Stockholm Convention, but as well having engaged in the NIP Update process has demonstrated beyond reasonable doubt that it is committed to complying with requirements of the Convention. As regards this criterion, the project is considered to have demonstrated resources and motivation to mainstream results, which indicates low to no dependency, rating it as Highly Likely

Financial Sustainability rated "Highly Likely"

Institutional Sustainability

189. As the responsibility for development of the NIP was solidly anchored in the Ministry of Environment (MMA), and as supporting structures and teams were established with a broad representation, this is considered to strongly support the seamless integration with national policies and programmes. This includes coordination across government agencies, as well as with industry, NGOs and academia. In the course of interviews, not only was complete ownership of the project documented, but clear expressions of

[39] *I.e. There were minor shortcomings in the project M&E system (GEF ratings criteria)*

concrete actions having been taken to ensure continuity of project results, going further even than expected results were as well.

190. Finally, the fact that the national Executing Agency is described[40] as having "considerable experience in the development, implementation and managerial oversight of projects and programmes funded by various MEAs […], including the GEF" strongly supports this component of sustainability; as well the Ministry of Environment (MMA) is considered to have "wide experience of collaboration with various Intergovernmental Organizations, bilateral donors and enterprises in Brazil". It should also be pointed out that although with considerable delays (for external factors beyond the control of the Project) the MMA acted as the national Implementing Agency for the initial PDF-B phase of this project. A task completed successfully.

191. Finally as the endorsed NIP has no dependency on this criterion, and in addition as outcomes are well on the way to being fully mainstreamed and individual and institutional capacities have been strengthened, the rating here is also Highly Likely, based on low to no dependency.

Institutional Sustainability is Rated "Highly Likely"

192. Based on the above, as well as on the Assessment of Likelihood of Impact Decision Tree (version 27.11.18), the overall rating for this criterion is Highly Likely.

The overall Rating for Sustainability is 'Highly Likely'

5.4.10 Factors and Processes Affecting Project Performance

Preparation and readiness

193. Although highly satisfactory results were achieved, it is evident that even if project objectives and components were clear, practical and seemed achievable within the expected time frame, external factors detailed below, and which could not have been anticipated severely affected efficient delivery and required the project to be extended on six occasions.

194. These external and unforeseeable events hindered the implementation of early stages of the project of which the most damaging were:

- Changes in the Ministry of Environment (including during the process leading to the 2015 impeachment of President Rousseff) which impacted implementation of most MEAs, including the NIP – "the system was paralysed on several occasions"[41];
- Internal delays and long response times from the Ministry of Foreign Affairs as regards approval of the Project Document, which reportedly took 10 months;
- Role and status of the UN Environment Brazil, and budget allocation issues also affected performance and at times Nairobi was perceived as "slow and unresponsive", reportedly in part due to changes in the financial management system (transition from IMIS to UMOJA) and related difficulties to reconcile accounts between systems;

[40] *Project Document from GEF database*

[41] *Interview data*

- On a different note, the exchange rate also affected the project budget and available funds, which kept growing, requiring adaptive management: in 2012/13 exchange rate was 1 US$ to 1.5 Real and today 1 US$ to 4 Real. This created a virtual "surplus" of funds used amongst others, for the SSFA with the CETESB and translation of a series of Stockholm Convention related documents.

195. Responsiveness to human rights and gender equity were not a specific focus of the project, although risk of exposure to POPs is high in vulnerable communities. This said, at the time of project formulation, inclusion of gender considerations was not a specific requirement under the GEF. Gender is not an important factor in components 1 through 4 and 6, and no evidence was provided to the evaluator as to any specific gender considerations having been taken for Public Awareness and Education Programme and Materials (under component 5).

196. Although, interview data confirmed that at the time of project development and implementation there were "no specific interventions targeting women", this has reportedly changed with new interventions supporting for example the work of socially oriented institutions/foundations (i.e. Alana's work with mothers being tested for PCBs (breastmilk) in 17 states of Brazil (www.alana.org.br).

197. In light of the laudable achievements to date, and notwithstanding the external factors that could not have been anticipated and that did severely affect efficient and timely delivery of the project, the overall rating for this project is Highly Satisfactory.

6 Conclusions and Recommendations

Conclusion 1	**Creative use of co-financing**
	Recommendation 1:
Administrative formalities and/or constraints (no cost extensions and substantive revisions) lead to considerable delays	When possible, co-financing (cash and/or in-kind) should be mobilized concurrently to project revisions/extensions to support project continuity and avoid delays UN Environment and Government
Contributing Conclusions	**Supportive recommendations:**
Operationalizing a change of roles i.e. transferring the role of Implementing Agency to a Liaison Office proved long and complex	UN Environment should, if/when this situation newly arises, ensure that all provisions are taken to ensure that a seamless transfer of responsibilities takes place in order to minimize implementation delays
Conclusion 2	**The risk of underestimating risks**
	Recommendation 2:
Project design does not extensively explore the potential risks	The complexities of change further to planned political transitions should be acknowledged and reflected, in the expected duration of multi-year agreements UN Environment (as Implementing Agency)
Contributing Conclusions	**Supportive recommendations:**
Risks to the project (socio-political) are not fully acknowledged although they were a regular and well known part of governmental transitions Implementation time frame was not realistic	To support realistic time frames, any foreseeable change of government that coincides with the timeframe of a project must be accounted for

Table 6: Ratings Table

Criterion	Summary Assessment	Rating
A. Strategic Relevance	**Considered highly relevant by all stakeholders**	**HS**
1. Alignment to MTS and POW	Yes, there is demonstrated alignment	HS
2. Alignment to UN Environment /Donor/GEF strategic priorities	Yes, there is demonstrated alignment	HS
3. Relevance to regional, sub-regional and national environmental priorities	Yes, there is demonstrated relevance	HS

Criterion	Summary Assessment	Rating
4. Complementarity with existing interventions	Yes, designed to be complementary	HS
B. Quality of Project Design	**As per the standards of the time, however weaknesses identified**	**S**
C. Nature of External Context	Although this did have an impact on the project implementation, it is not considered to have been significant	**MU**
D. Effectiveness[42]	Internal and external factors affected this	**HS**
1. Delivery of outputs		HS
2. Achievement of direct outcomes	Would likely not have occurred without project support,	HS
3. Likelihood of impact	No documented changes at this stage, however significant progress noted	HL
E. Financial Management	No major shortfalls noted	**S**
1.Completeness of project financial information		S
2.Communication between finance and project management staff		S
F. Efficiency	No major concerns, even though six no cost extensions (unforeseen circumstances)	**MS**
G. Monitoring and Reporting	Data available, and mostly complete	**HS**
1. Monitoring design and budgeting	No significant weaknesses (other than poor direct outcome monitoring)	S
2. Monitoring of project implementation	Effectively monitored since at least 2012	S
3.Project reporting	No major weaknesses, however incomplete PIRs should have raised questions and led to corrective action	S

[42] Where a project is rated, through the assessment of Project Design Quality template during the evaluation inception stage, as facing either an Unfavourable or Highly Unfavourable external operating context, ratings for Effectiveness, Efficiency and/or Sustainability may be increased at the discretion of the Evaluation Consultant and Evaluation Manager together.

Criterion	Summary Assessment	Rating
H. Sustainability		**HL**
1. Socio-political sustainability	No major concerns noted	HL
2. Financial sustainability	Mainstreamed into governmental mechanisms	HL
3. Institutional sustainability	Knowledge has been internalized and is likely to remain	HL
I. Factors Affecting Performance[43]		**S**
1. Preparation and readiness	All elements were in place	S
2. Quality of project management and supervision[44]	Demonstrated adaptive management helped to maintain Project on track, despite challenges	S
3. Stakeholders participation and cooperation	No major concerns	S
4. Responsiveness to human rights and gender equity		Not Rated
5. Country ownership and driven-ness	No major concerns	HS
6. Communication and public awareness	No major concerns	S
Overall Project Rating		**HS**

6.1 Lessons Learned

198. Although resolving the internal arrangements of the Implementing Agency initially delayed project implementation, these did address a direct request from the country and significantly contributed to the project's overall success; in-country presence, familiarity with local, national and regional priorities, and reduced response time are considered to have been a definite advantage;

199. Project extensions and/or Substantive Revisions are complex and generally very time consuming; these can paralyze project implementation for months;

200. Using adaptive management, good planning and if possible using the available co-financing to fund a project is a reasonable measure to avoid delays;

[43] While ratings are required for each of these factors individually, they should be discussed within the Main Evaluation Report as crosscutting issues as they relate to other criteria. Catalytic role, replication and scaling up should be discussed under effectiveness if they are a relevant part of the TOC.

[44] 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, as the Implementing Agency.

201. Underestimating or ignoring the cost of political transitions (in terms of time) has the potential to seriously derail effective and efficient implementation of a project.

Annex I. Itinerary and Stakeholders Interviewed

Table 6: Itinerary

Date	From	To
28 October	Buenos Aires	Brasilia
31 October	Brasilia	São Paulo
1 November	São Paulo	Mexico City

Table 7: Stakeholders Interviewed

Name	Institution	Contact (if available)
Alvarez, Jacqueline	UN Environment Geneva	Head - Knowledge and Risk Unit
Ambrosio, Marco Antonio	UN Environment Brasilia	Administrator
Bortoletti, Mariana	UN Environment Brasilia	Project Management Team
Campanelli, Claudia	CETESB	Environmental Analyst
Cavini, Regina	UN Environment	Senior Programme Officer
Chiodi Moire, Giovana	UN Environment Geneva	Task Manager
Cogo Beck, Lisandro	Ministry of Environment	Project counterpart
Helps, Kevin	UN Environment	Task Manager
Menezes, Francisca	UN Environment Brasilia	Project Management team
Ocaña, Jorge	Ex-UN Environment	Task Manager
Reis de Carvalho, Leticia	Ministry of Environment	Director – Department of Environmental Quality
Soares, Paulo Enrique	UN Environment Brasilia	Project Management team
Torres de Almeida, Marilia	Ministry of the Environment	Environmental Analyst
Traldi Meneses, Lady Virginia	CETESB – Regional Stockholm Convention Centre	Manager and General Project Coordinator

Annex II. Summary of Co-Finance Information

Co-financing reports were developed and presented for every year of the project, from 2010 to 2017 (Final Report). These include a breakdown of the position and role played by staff of the Ministry of the Environment (MMA), and a calculation of their costs based on the percentage of time spent on the project, per quarter for each year.

In addition, these included reports of planned and actual in-kind co-financing by budget line. Please see 3.6 for details.

Financial Management Table

NON-GEF AND GEF PROJECTS			
Financial management components:		**Rating**	**Evidence/ Comments**
1. Completeness of project financial information[45]:			
Provision of key documents to the evaluator (based on the responses to A-G below)		S	No significant deficiencies identified
A.	Co-financing and Project Cost's tables at design (by budget lines)	n/a	Not a requirement at time of project design
B.	Revisions to the budget	Yes	Supporting documentation was provided
C.	All relevant project legal agreements (e.g. SSFA, PCA, ICA)	Yes	Supporting documentation was provided
D.	Proof of fund transfers	n/a	Reports of expenditures and payments were provided (UNDP Atlas system)
E.	Proof of co-financing (cash and in-kind)	Yes	Detailed summary of overall co-financing provided – as well as yearly co-financing by budget line
F.	A summary report on the project's expenditures during the life of the project (by budget lines, project components and/or annual level)	n/a	Summary over the life of the project is not provided, but this information is included in quarterly reports
G.	Copies of any completed audits and management responses *(where applicable)*	n/a	
H.	Any other financial information that was required for this project (list):	No	All necessary documents were provided
Any gaps in terms of financial information that could be indicative of shortcomings in the project's compliance[46] with the UN Environment or donor rules		No	
Project Manager, Task Manager and Fund Management Officer responsiveness to financial requests during the evaluation process		HS	Information was made readily available when/as required
2. Communication between finance and project management staff		S	
Project Manager and/or Task Manager's level of awareness of the project's financial status.		S	Strong awareness documented

[45] See also document 'Criterion Rating Description' for reference

[46] 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.

Fund Management Officer's knowledge of project progress/status when disbursements are done.	S	Strong awareness documented
Level of addressing and resolving financial management issues among Fund Management Officer and Project Manager/Task Manager.	S	Initially addressed retrospectively, then proactively
Contact/communication between by Fund Management Officer, Project Manager/Task Manager during the preparation of financial and progress reports.	S	Regular / frequent contact documented
Overall rating	S	

Annex III. List of Consulted Documents

- CEO Approval documents
- PIF Review
- Prodoc Revisions
- Project Extensions
- Cash advance statements and expenditures related documents
- Reports and workplans
- Progress reports
- Co-finance reports, Annual and Final
- Inception Report
- Legal Documents
- NIP, National Inventories, Action Plans
- Project Implementation Reports-PIR
- Quarterly Progress and Financial Reports
- SSFA with CETESB

Annex IV. Evaluation Bulletin

The Terminal Evaluation (TE) of the UN Environment project entitled "Development of a National Implementation Plan in Brazil as a first step to implement the Stockholm Convention on Persistent Organic Pollutants (POPs)" developed under the Stockholm Convention and funded by the Global Environment Facility (GEF), was completed in February of 2019. The overall objective of the Evaluation was to assess in a systematic and objective manner the performance of the project against the Theory of Change using the UN Environment Evaluation Office's standard evaluation criteria.

Different methods were used to ensure that data gathering and analysis delivered evidence-based qualitative and quantitative information, obtained from a wide range of sources, including desk review of studies and literature, individual anonymous and confidential in-depth interviews, e-mails, and field visits (October-November of 2018). The key question of the Terminal Evaluation was whether the project has achieved or is likely to achieve the project goal of "protecting human health and the environment from persistent organic pollutants" – the principal objective of the Stockholm Convention.

The project was approved for implementation by the GEF on 3 October 2007; it was to start in January of 2008, and end in December of 2009 (24 months). The GEF Implementing Agency for the project was UN Environment and a national implementation modality was followed, with the Brazilian Ministry of the Environment (MMA) as the Executing Agency. During the course of implementation, the project received 6 no-cost extensions, the last of which extended the duration to 9 years and 5 months (to May 2017); a 7 year and 5 month delay. This said, and as explained below, the project received an overall evaluation rating of Highly Satisfactory, as detailed below.

Overall the purpose of this full-size project was to develop the National Implementation Plan (NIP) to guide the implementation of the Stockholm Convention in Brazil. The NIP endorsed by the Brazilian Government in 2015 represents the principal intended Output of this full-size project while the demonstrated sustainable capability to implement the Convention in Brazil is its principal Outcome.

The strategic relevance of the project was found to be highly satisfactory; it is aligned with the mandate, Mid Term Strategy (MTS) and thematic priorities of UN Environment; with regional, sub-regional and national environmental priorities; with target group and beneficiaries' needs and priorities; with GEF Strategic priorities and is complementary to existing interventions. In addition, it also shows alignment with UN Environment capacity building and South-South cooperation policies.

The project was designed to respond to concerns regarding the lack of capacities to develop a National Implementation Plan. The project document laid out goals and objectives in a manner consistent with priorities and was developed using the appropriate standards of the time. However, the Terminal Evaluation considers that, given it was extended on 6 occasions, it would have benefitted from a review/revision – further or as a condition - for these extensions to be granted. This would have brought the design up-to-date with current UN Environment policies. Overall the quality of project design was rated as Satisfactory.

Effectiveness of the projects components was assessed based on the delivery of the restructured outputs, on achievement of the direct outcomes, and likelihood of impact. The Evaluator was able to document significant qualitative and quantitative results for all Direct Outcomes. Project management, the first component, was fully achieved with the designation of project management structures and coordination teams, both in UN Environment and in the Ministry of Environment (MMA). The quality of project management and supervision is rated as 'Satisfactory' under the criterion Factors Affecting Performance (see para 5.4.10 above).

The second component regarding development of measures in relation to POPs wastes and contaminated sites delivered inventories and approved Action Plans on pesticide POPs, new POPs and POPs contaminated sites. The third component on development of measures in relation to PCBs delivered a PCB inventory an approved Action Plan including PCBs from the electrical utilities sector as well as the industrial and transport sectors. The fourth component on measures in relation to the unintentional production of POPs delivered a national inventory on Dioxins and Furans and an approved Action Plan to Reduce and Eliminate Emissions of Dioxins and Furans, and others u-POPs, which also included a review of BAT/BEP, and existing regulatory and monitoring capacities.

The fifth component, on measures in relation to national infrastructure to implement the Convention supported the development of a National POPs Information System, of a course delivered by the Environmental Body of the State of São Paulo (CETESB) in its Training Centre (as part of the Masters in Science in Environmental Management), as well as on-line (distance learning) to a total of approximately 250 alumni, of which 187 were certified. This course is now part of the ongoing educational program of CETESB47, and a new course on PCBs is being developed following the same implementation modality. This component also delivered a Preparatory Seminar on Mobilization Strategies for implementation of the Stockholm Convention, aimed at civil society and NGOs and covering the presentation of the status of activities and discussion of strategies, and finally, a Socio-economic assessment of Implementation of the Stockholm Convention with a particular focus on U-POPs and, a cost-benefit analysis on environmental sound management of PCBs and POPs pesticides.

The sixth and final component covering preparation and endorsement of the National Implementation Plan delivered an initial Provisional NIP and National Report, as required under Article 15 of the Stockholm Convention; and finally the approved, adopted and submitted, National Implementation Plan.

Although it can be argued that the late delivery of these results should affect this rating, as well as that for Efficiency, the evaluator, based on the evidence available, considers that these delays have in fact strengthened the country's ability to deliver results. In particular it was evidenced that the administrative hurdles played into the government's own plans to strengthen its environmental institutions and its capacities.

In addition, Interview data unequivocally considered this project as a success and the information presented in the relevant section (5.4.2 above) argues in favour of a highly satisfactory rating for achievement of the Outputs (leading to Outcomes), since they are the

[47] *https://cetesb.sp.gov.br*

most important to attain the intermediate states i.e. Existing gaps in POPs management identified and actions to improve management in place; and, Strategy and action plan developed to reduce and eliminate listed chemicals.

As regards likelihood of impact, the direct Outcomes necessary for the attainment of intermediate states have been achieved, and this with the awareness and support of all stakeholders, including industry and NGOs. The MMA has assumed full ownership of the Project and has taken the lead role in this, taking on the "driver's seat position". Given the Project has achieved changes in reducing releases of POPs (and in particular PCBs), as a result of the implementation of the appropriate measures which were approved in the NIP (2015) and implemented (in relation to POPs, PCBs, and U POPs) and is considered to be aligned to contribute to the reduction of environmental and health risks, the likelihood of impact is assessed as highly likely".

Overall the project faced severe delays in its implementation and did not produce results within the initial time frame available (i.e. by December 2011), however the Evaluator considers that there are mitigating factors that partially account for this; these include a series of unforeseeable events including changes at the Ministry of Environment, internal delays and long response times from other ministries, clarification of the role and status of UN Environment Brazil, etc. (please refer to 5.4.10 above for details), which effectively derailed project implementation and have contributed to a seven and a half-year delay, and to what can be considered low operational efficiency.

Although the project was granted 6 no-cost extensions the activities have resulted in the intended Outputs, even though this did not occur within the initially planned timeframes. As already mentioned, this is not a consequence of project design, but rather of the cascading effect of a series of unplanned and unpredictable events, which were all addressed and resolved and led to the successful delivery of the intended high level result of adoption of a National Implementation Plan for Brazil. Efficiency is rated as moderately satisfactory.

Overall sustainability is rated as highly likely. Responsiveness to human rights and gender equity were not a specific focus of the project, although risk of exposure to POPs is high in vulnerable communities. This said, at the time of project formulation, inclusion of gender considerations was not a specific requirement under the GEF.

In light of the laudable achievements to date, and notwithstanding the external factors that could not have been anticipated and that did severely affect efficient and timely delivery of the project, the overall rating for this project is Highly Satisfactory.

Annex V. Evaluation ToRs

TERMS OF REFERENCE

Terminal Evaluation of the UN Environment/Global Environment Facility (GEF) project "Development of a National Implementation Plan in Brazil as a first step to implement the Stockholm Convention on Persistent Organic Pollutants (POPs)"

Section 1: PROJECT BACKGROUND AND OVERVIEW

1. Project General Information

Table 1. Project summary

GEF Project ID:	**2096**		
Implementing Agency:	UN Environment Economy Division[48]	**Executing Agency:**	Ministry of the Environment of Brazil
Sub-programme:	Chemicals and waste	**Expected Accomplishment(s):**	To be confirmed during the evaluation process
UN Environment approval date:	28 April 2008	**Programme of Work Output(s):**	To be confirmed during the evaluation process
GEF approval date:	03 October 2007[49]	**Project type:**	Full-size project
GEF Operational Programme #:	Persistent Organic Pollutants, OP14	**Focal Area(s):**	Persistent Organic Pollutants (POPs)
		GEF Strategic Priority:	GEF IV Strategic Priority 1: strengthen capacities for NIP implementation.
***Expected* start date:**	January 2008	**Actual start date:**	
***Planned* completion date:**	December 2009	**Actual completion date:**	2017
***Planned* project budget at approval:**	2,719,973 USD	**Actual total expenditures reported as of [date]:**	To be confirmed during the evaluation process
GEF grant allocation:	1,263,518 USD	**GEF grant expenditures reported as of June 2015:**	979,407.23 USD[50]
Project Preparation Grant - GEF financing:	350,000 USD	**Project Preparation Grant - co-financing:**	130 000 USD in-kind

[48] Previously Division of Technology, Industry and Economy (DTIE)
[49] GEF project database (https://www.thegef.org/project/development-national-implementation-plan-brazil-first-step-implement-stockholm-convention
[50] PIR June 2015

			(65 000 USD UN Environment, 65 000USD Brazil Gov.)
***Expected* Full-Size Project co-financing:**	1,456,455 USD	**Secured Full-Size Project co-financing:**	1,456,455 USD[51]
First disbursement:	To be confirmed during the evaluation process	**Date of financial closure:**	After terminal evaluation
No. of revisions:	**6**	**Date of last revision:**	March 2017
No. of Steering Committee meetings:	To be confirmed during the evaluation process	**Date of last/next Steering Committee meeting:**	**Last:** **No info** / **Next:** **No info**
Mid-term Review/ Evaluation *(planned date):*	n/a	**Mid-term Review/ Evaluation (actual date):**	n/a
Terminal Evaluation *(planned date):*	End of project	**Terminal Evaluation (actual date):**	October 2018
Coverage - Country(ies):	Brazil	**Coverage - Region(s):**	Latin America - Brazil
Dates of previous project phases:	n/a	**Status of future project phases:**	NIPs update project (approved by GEF 2015)

2. Project background

The Stockholm Convention on Persistent Organic Pollutants (POPs) (hereafter 'the Convention' or 'Stockholm Convention') is a global treaty (adopted in 2001 and entered into force in 2004) established to protect human health and the environment from these chemicals that can remain intact in the environment for long periods, become widely distributed geographically, accumulate in the fatty tissue of humans and wildlife, and have harmful impacts on human health or on the environment. Exposure to POPs can lead to serious health effects. Given their long-range transport, no one government acting alone can protect its citizens or its environment from POPs. In response to this global problem, the Stockholm Convention requires its parties to take measures to eliminate or reduce the release of POPs into the environment.[52]

Brazil signed the Stockholm Convention on 16th June 2004. Article 7 of the Convention obligates the members to develop a National Implementation Plan (NIP) for the Stockholm Convention and submit it to the Conference of the Parties (CoP) within two years of entry into force of the Convention[53].

Article 14 of the Convention states that "The institutional structure of the Global Environment Facility [GEF] … shall, on an interim basis, be the principal entity entrusted with the operations of the financial mechanism referred to in Article 13…". The principle funding mechanism of GEF support to developing countries for the NIPs development process has been in the format of 'Enabling Activities'[54]. Nevertheless, considering the size of the Brazilian economy and the role

[51] Final Report (period December 2009 -May 2017)
[52] http://chm.pops.int/TheConvention/Overview/tabid/3351/
[53] Article 7(1)(a)-(b) of the Convention. The Convention enters into force for a Party on the 90th day after the date of deposit of the instrument of ratification (Article 26(2)).
[54] *Enabling activities are foundational activities that specifically prepare and guide effective response measures (e.g. investment priorities) as well as produce plans, strategies and encourage integration of convention objectives*

of chemical production, trade and use in the country, Brazil opted to develop its NIP through a GEF full-size project cycle instead of the enabling activity modality.

In addition to developing the NIPs, the project activities were planned to remove barriers to the successful implementation of the Convention in Brazil through actions compatible with the requirements of the Convention and specific guidance documents.

The design of this Brazilian NIPs project was developed with the support of a Project Development Facility Block B (PDF-B) grant from the Global Environment Facility (GEF).

3. Project objectives and components[55]

The goal of this project was to protect human health and the environment from persistent organic pollutants – the principal objective of the Convention.

The purpose of this full-size project was to develop the National Implementation Plan (NIP) for implementing the Convention in Brazil in accordance with the requirements of Article 7 of the Convention, taking into account the guidance adopted at the first Conference of the Parties. The NIP endorsed by the Brazilian Government represents the principal intended output of this full project while the sustainable capability to implement the Convention in Brazil is its principal outcome.

The project was grouped into a series of objectives:

Objective 1: Project Management and Supervision: "To ensure the proper management and oversight of the project and the close coordination between its national and international actors in order to deliver high-quality project outputs on time and within budget"

Objective 2: Measures in relation to POPs wastes and sites contaminated by POPs: "To develop measures, appropriate to the obligations on Parties set out in the Convention, in relation to products and articles in use; wastes consisting of, containing or contaminated with intentionally or unintentionally produced POPs; and sites contaminated by such wastes."

Objective 3: Measures in relation to polychlorinated biphenyls (PCBs): "To develop measures, appropriate to the obligations on Parties set out in the Convention, in relation to polychlorinated biphenyls (PCBs)."

Objective 4: Measures in relation to the unintentional production of POPs: "To develop measures, appropriate to the obligations on Parties set out in the Convention, in relation to unintentionally produced POPs."

Objective 5: Measures in relation to national infrastructure to implement the Convention: "To develop a sustainable infrastructure enabling Brazil to implement the Stockholm Convention at Federal and state levels."

Objective 6: Preparation and endorsement of the National Implementation Plan: "To prepare a high-quality national plan meeting Brazil's needs to implement the Stockholm Convention and suitable for Government endorsement and transmission to the Conference of the Parties."[56]

4. Executing Arrangements

The GEF Implementing Agency of the Project is UN Environment. The UN Environment Task Manager is based in Economy Division's (Previously Division of Technology, Industry and Economy – DTIE) Chemicals Branch in Geneva and was supported by the UN Environment Brazil Office (in Brasilia).

The project followed national implementation modality, the Brazilian Ministry of the Environment (MMA) as the executing agency. Key national partner under MMA was National Chemical

into national development efforts and sectors. NIPs enabling activities usually <500 000 USD. Source: https://www.gefieo.org/sites/default/files/ieo/ieo-documents/gef-enabling-activities-approch-paper.pdf

[55] Source : project document

[56] The National Implementation Plan was submitted to the Convention Secretariat in April 2015.

Safety Commission (CONASQ). The project also cooperated with multiple national and regional partners.

5. Project Cost and Financing

The project costs and funding sources are summarized in table 2.

Table 2. Project cost at design

GEF		1,263,518 USD
Co-financing		
Cash	Government of Brazil	1,406,455 USD
In-kind	UN Environment	50,000 USD
	Sub-total Co-Financing	1,456,455 USD
	Total Project Cost	2,719,973 USD

6. Implementation Issues

According to the Project Implementation Review (PIR) 2015 and initial stakeholder interviews one main challenge of the project was the lack of available POPs expertise in Brazil, which eventually contributed to significant delays of the project implementation. Initial interviews also indicated that there was a relatively high turnover of key personnel in the implementing and executing agencies.

Section 2. OBJECTIVE AND SCOPE OF THE EVALUATION

7. Key Evaluation principles

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.

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.

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.

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.

8. Objective of the Evaluation

In line with the UN Environment Evaluation Policy[57] and the UN Environment Programme Manual[58], 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 the Ministry of the Environment of Brazil. Therefore, the evaluation will identify lessons of operational relevance for future project formulation and implementation of the project aiming to update the National Implementation Plan in Brazil with new Stockholm Convention requirements.

9. Key Strategic Questions

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:

- What were the main reasons for delays in project implementation? To what extent did these delays have influence on the overall performance of the project? What lessons can be drawn from these experiences to be considered in on-going and future UN Environment projects supporting implementation of Stockholm Convention implementation at the country level? (efficiency criterion - timeliness)

- What are the key lessons concerning internal arrangements of the implementing agency (UN environment)? To what extent these internal management and implementing structures supported/hindered project implementation? (management and supervision criterion)

10. Evaluation Criteria

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

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 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

[57] http://www.unep.org/eou/StandardsPolicyandPractices/UNEPEvaluationPolicy/tabid/3050/language/en-US/Default.aspx

[58] http://www.unep.org/QAS/Documents/UNEP_Programme_Manual_May_2013.pdf . *This manual is under revision.*

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[59] (MTS) and Programme of Work (POW)*

The evaluation should assess the project's alignment with the MTS and POW (or similar strategic guidance of UN Environement) 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*

Donor, including GEF, strategic priorities will vary across interventions. UN Environment strategic priorities include the Bali Strategic Plan for Technology Support and Capacity Building60 (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 Global, Regional, Sub-regional and National Environmental Priorities*

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 as well as global aspects as relevant.

iv. *Complementarity with Existing Interventions*

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

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 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

[59] 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.
[60] http://www.unep.org/GC/GC23/documents/GC23-6-add-1.pdf

- Responsiveness to human rights and gender equity

C. Nature of External Context

At evaluation inception stage a rating is established for the project's external operating context (considering the prevalence of unexpected conflicts, natural disasters and/or 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, due to a negative external event that 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

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 supervision[61]

ii. Achievement of Direct Outcomes

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 reconstructed[62] 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 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

[61] 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.

[62] 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.

- Stakeholders' participation and cooperation
- Responsiveness to human rights and gender equity
- Communication and public awareness

iii. Likelihood of Impact

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.

The evaluation will also consider the likelihood that the intervention may lead, or contribute to, unintended negative effects. 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.[63]

The evaluation will consider the extent to which the project has played a catalytic role or has promoted scaling up and/or replication[64] as part of its Theory of Change and as factors that are likely to contribute to longer term impact.

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[65] 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

E. Financial Management

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

[63] Further information on Environmental, Social and Economic Safeguards (ESES) can be found at http://www.unep.org/about/eses

[64] *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.

[65] A list of relevant SDGs is available on the EO website www.unep.org/evaluation

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

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.

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.

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

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

Each project should be supported by a sound monitoring plan that is designed to track progress against SMART[66] indicators towards the delivery of the projects 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

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

[66] SMART refers to indicators that are specific, measurable, assignable, realistic and time-specific.

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

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

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 (ie. '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 assessment of bio-physical factors that may affect the sustainability of direct outcomes may also be included.

i. Socio-political Sustainability

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

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 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. Even where future funding has been secured, the question still remains as to whether the project outcomes are financially sustainable.

iii. Institutional Sustainability

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

I. 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

This criterion focuses on the inception or mobilisation stage of the project (ie. 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

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.

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

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

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.

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

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, ie. 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

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

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.)

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

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

Relevant background documentation, inter alia Stockholm Convention and related provisions, guidance notes etc. and studies concerning POPs situation in Brazil;

Project design documents (including minutes of the project design review meeting at approval), Project Review Committee documentation; 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: including but not limited to National Implementation Plan (submitted in 2015), National Inventory documents, Reviews of legislation, and action plans for POPs management;

Mid-Term Review of the project (if applicable);

Evaluations/reviews of similar projects.

(b) **Interviews** (individual or in group) with:
UN Environment Task Manager (TM) and other relevant implementing agency staff;

Project management team;

UN Environment Fund Management Officer (FMO);

Sub-Programme Coordinator;

Project partners,

Relevant resource persons.

Surveys (to be considered in the evaluation inception stage)
Field visit to Brazil (4/5-day mission to Brasilia and Sao Paolo)
Other data collection tools

11. Evaluation Deliverables and Review Procedures

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.
- **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 (as applicable)

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.

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.

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.

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.

12. The Evaluation Consultant

For this evaluation, the evaluation team will consist of one Evaluation Consultant] who will work under the overall responsibility of the Evaluation Office represented by an Evaluation Manager Saila Toikka in consultation with the UN Environment Task Manager Ludovic Bernaudat Fund Management Officer Anuradha Shenoy and the Sub-programme Coordinator of the Chemicals and Waste Sub-Programme 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.

The consultant will be hired over the period [15 May/2018 to 15 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 15 years of technical / evaluation experience, including of evaluating large national and regional programmes and using a Theory of Change approach; a broad understanding of issues related to Persistent Organic Pollutants and Stockholm Convention; proficiency in Portuguese is required, along with excellent writing skills in English; and where possible, knowledge of the UN system, specifically of the work of UN Environment.

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 together that all evaluation criteria and questions are adequately covered.

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.

13. Schedule of the evaluation

The table below presents the tentative schedule for the evaluation.

Table 3. Tentative schedule for the evaluation

Milestone	**Due Dates**
Inception interviews and desk review	July 30
Inception Report – first submission	July 30
Inception Report – final submission	August 15
Evaluation Mission (5 days in Brazil)	September 15
Telephone interviews, surveys etc.	October 30
Powerpoint/presentation on preliminary findings and recommendations	November 30
Draft report to Evaluation Manager (and Peer Reviewer)	December 20
Final Report	February 15

14. Contractual Arrangements

Evaluation Consultants 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.

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:

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%

Fees only contracts: 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.

The consultants may be provided with access to UN Environment's Programme Information Management System (PIMS) and if such access is granted, the consultants agree not to disclose information from that system to third parties beyond information required for, and included in, the evaluation report.

In case the consultants are 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.

If the consultant(s) 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 1: Tools, Templates and Guidance Notes for use in the Evaluation

The tools, templates and guidance notes listed in the table below, are intended to help Evaluation Managers and Evaluation Consultants to produce evaluation products that are consistent with each other and which can be compiled into a biennial Evaluation Synthesis Report. The biennial summary is used to provide an overview of progress to UN Environment and the UN Environmental Assembly.

This suite of documents is also intended to make the evaluation process as transparent as possible so that all those involved in the process can participate on an informed basis. It is recognised that the evaluation needs of projects and portfolio vary and adjustments may be necessary so that the purpose of the evaluation process (broadly, accountability and lesson learning), can be met. Such adjustments should be decided between the Evaluation Manager and the Evaluation Consultant in order to produce evaluation reports that are both useful to project implementers and that produce credible findings.

ADVICE TO CONSULTANTS: As out tools, templates and guidance notes are updated on a continuous basis, kindly download documents from these links during the Inception Phase of the evaluation and use those versions throughout the evaluation.

[TO BE PROVIDED BY THE EVALUATION MANAGER]

Document	**Name**
1	Evaluation Process Guidelines for Consultants
2	Evaluation Criteria *(summary of descriptions, as in these terms of reference)*
3	Evaluation Ratings Table
4	Matrix Describing Ratings by Criteria
5	Weighting of Ratings (excel)
6	Project Identification Tables (GEF and non-GEF)
7	Structure and Contents of the inception Report
8	Structure and Contents of the Main Evaluation Report
9	Template for the Assessment of the Quality of Project Design
10	Use of Theory of Change in Project Evaluations
11	Assessment of the Likelihood of Impact Decision Tree (Excel)
12	Possible Evaluation Questions
13	Structure and Contents of the Main Evaluation Report
14	Cover Page, Prelims and Style Sheet for Main Evaluation Report
15	Financial Tables
16	Template for the Assessment of the Quality of the Evaluation Report

Annex VI. Assessment of the Quality of the Evaluation Report

Evaluation Title:

GEF 2096: "Development of a National Implementation Plan in Brazil as a first step to implement the Stockholm Convention on Persistent Organic Pollutants (POPs)"

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: 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.	Final report: The Executive Summary is clear and concise, covering all the relevant information – including an explanation of how a long-delayed project can still reach 'highly satisfactory perforamnce'	6
I. 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 concise statement of the purpose of the evaluation and the key intended audience for the findings?	Final report: All relevant background information is provided.	6
II. Evaluation Methods This section should include a description of how the *TOC at Evaluation*[67] was designed (who was involved etc.) and applied to the context of the project? A data collection section should include: a description of evaluation methods and information sources used, including 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.).	Final report: The section read well and covers the main areas. UN Environment is trying to respond to the evalutaion requirements of the UN Sector Wide Approach to Human Rights and Gender Equality and has not yet found the best ways to capture gender dimensions in highly technical projects that do not lend themselves to direct engagement	5

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

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. It should also address evaluation limitations such as: low or imbalanced response rates across different groups; gaps in documentation; extent to which findings can be either generalised to wider evaluation questions or constraints on aggregation/disaggregation; any potential or apparent biases; language barriers and ways they were overcome. Ethics and human rights issues should be highlighted including: how anonymity and confidentiality were protected and strategies used to include the views of marginalised or potentially disadvantaged groups and/or divergent views.	with beneficiaries. UN Environment evaluation has also not yet formalised how an ethics (commitment to confidentiality, anonymity) statement can best be incorporated in our evaluation reports, although we are sure that these ethical considerations are followed.	
III. The Project This section should include: • *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). • *Objectives and components*: Summary of the project's results hierarchy as stated in the ProDoc (or as officially revised) • *Stakeholders:* Description of groups of targeted stakeholders organised according to relevant common characteristics • *Project implementation structure and partners:* A description of the implementation structure with diagram and a list of key project partners • *Changes in design during implementation:* Any key events that affected the project's scope or parameters should be described in brief in chronological order • *Project financing:* Completed tables of: (a) budget at design and expenditure by components (b) planned and actual sources of funding/co-financing	Final report: All elements covered well.	6
IV. Theory of Change 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 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'.*	Final report: As the intervention has the characteristics of an 'Enabling Activity', formulating outcomes at behavioural change levels while remaining true to the ambitions of the intervention, was challenging. The consultant managed to do this up to the Intermediate State level.	5.5
V. Key Findings **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	Final report: Clear and concise	6

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: 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: Good summary.	6
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: External context well described	6
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. The effects of the intervention on differentiated groups, including those with specific needs due to gender, vulnerability or marginalisation, should be discussed explicitly.	Final report: The discussion of delivery of outputs is detailed. The discussion of the achievement of outcomes is short here and the rating derives also from various sections of the report – impact of delays in heightening the need for country ownership; discussion of assumptions and drivers etc.	5
(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? 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.	Final report: Discussion is grounded in an understanding of the TOC	5
E. Financial Management This section should contain an integrated analysis of all dimensions evaluated under financial management and include a completed 'financial management' table. 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	Final report: All aspects are considered and discussed, as far as UN Environment financial systems allow.	5
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,	Final report: Detailed discussion that makes the determination of the rating clear.	6

synergies and complementarities with other initiatives, programmes and projects etc. • The extent to which the management of the project minimised UN Environment's environmental footprint.		
G. Monitoring and Reporting 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)*	Final report: All sections adequately discussed.	6
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: Good discussion under all sections.	6
I. Factors Affecting Performance These factors are <u>not</u> 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 • Quality of project management and supervision[68] • Stakeholder participation and co-operation • Responsiveness to human rights and gender equity • Country ownership and driven-ness • Communication and public awareness	Final report: Remaining topics covered, although Responsiveness to Human Rights and Gender Equity needs to be strengthened in all UN Environment evaluation reports, as mentioned above.	5
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: Clear conclusions, recommendations and lessons – strategic questions are addressed within the report.	6
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: Clear and useful lessons learned.	6
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.	Final report: Clear and useful recommendations.	6

[68] 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.

At least one recommendation relating to strengthening the human rights and gender dimensions of UN Environment interventions, should be given. 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: Structures and guidelines followed.	6
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: Well-written and formatted	6
OVERALL REPORT QUALITY RATING		**5.725**

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 evaluation process 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.*

Evaluation Process Quality Criteria	Compliance	
	Yes	No
Independence:		
1. Were the Terms of Reference drafted and finalised by the Evaluation Office?	**Y**	
2. Were possible conflicts of interest of proposed Evaluation Consultant(s) appraised and addressed in the final selection?	**Y**	
3. Was the final selection of the Evaluation Consultant(s) made by the Evaluation Office?	**Y**	
4. Was the evaluator contracted directly by the Evaluation Office?	**Y**	
5. Was the Evaluation Consultant given direct access to identified external stakeholders in order to adequately present and discuss the findings, as appropriate?	**Y**	
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?		**N**
7. If Yes to Q6: Were these concerns resolved to the mutual satisfaction of both the Evaluation Consultant and the Evaluation Manager?		
Financial Management:		
8. Was the evaluation budget approved at project design available for the evaluation?	**Y**	
9. Was the final evaluation budget agreed and approved by the Evaluation Office?	**Y**	
10. Were the agreed evaluation funds readily available to support the payment of the evaluation contract throughout the payment process?	**Y**	
Timeliness:		
11. If a Terminal Evaluation: Was the evaluation initiated within the period of six 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?		**N**
12. Were all deadlines set in the Terms of Reference respected, as far as unforeseen circumstances allowed?	**Y**	
13. Was the inception report delivered and reviewed/approved prior to commencing any travel?	**Y**	
Project's engagement and support:		
14. Did the project team, Sub-Programme Coordinator and identified project stakeholders provide comments on the evaluation Terms of Reference?	**Y**	
15. Did the project make available all required/requested documents?	**Y**	
16. Did the project make all financial information (and audit reports if applicable) available in a timely manner and to an acceptable level of completeness?	**Y**	
17. Was adequate support provided by the project to the evaluator(s) in planning and conducting evaluation missions?	**Y**	
18. Was close communication between the Evaluation Consultant, Evaluation Office and project team maintained throughout the evaluation?	**Y**	
19. Were evaluation findings, lessons and recommendations adequately discussed with the project team for ownership to be established?	Y	
20. Did the project team, Sub-Programme Coordinator and any identified project stakeholders provide comments on the draft evaluation report?	**Y**	
Quality assurance:		
21. Were the evaluation Terms of Reference, including the key evaluation questions, peer-reviewed?	**Y**	
22. Was the TOC in the inception report peer-reviewed?	**Y**	
23. Was the quality of the draft/cleared report checked by the Evaluation Manager and Peer Reviewer prior to dissemination to stakeholders for comments?	**Y**	
24. Did the Evaluation Office complete an assessment of the quality of both the draft and final reports?	**Y**	
Transparency:		
25. Was the draft evaluation report sent directly by the Evaluation Consultant to the Evaluation Office?	**Y**	
26. Did the Evaluation Manager disseminate (or authorize dissemination) of the cleared draft report to the project team, Sub-Programme Coordinator and other key	**Y**	

internal personnel (including the Reference Group where appropriate) to solicit formal comments?		
27. Did the Evaluation Manager disseminate (or authorize dissemination) appropriate drafts of the report to identified external stakeholders, including key partners and funders, to solicit formal comments?	**Y**	
28. Were all stakeholder comments to the draft evaluation report sent directly to the Evaluation Office	**Y**	
29. Did the Evaluation Consultant(s) respond adequately to all factual corrections and comments?	**Y**	
30. Did the Evaluation Office share substantive comments and Evaluation Consultant responses with those who commented, as appropriate?	**Y**	

Provide comments / explanations / mitigating circumstances below for any non-compliant process issues.

Process Criterion Number	**Evaluation Office Comments**