

Project Mid-Term Evaluation Report:

**“Environmentally Sound Management of POPs,  
Mercury and Other Hazardous Substances in  
Argentina”  
(PIMS#006281 //GEF ID#10094)**

**from 01 January 2020 to 31 March 2023.**

**Argentina**

<b>GEF focal area:</b>	<b>Chemicals and Waste</b>
<b>GEF Strategic Objective:</b>	<b>CW-1-1, CW-1-2</b>
<b>Implementation Agency:</b>	<b>United Nations Development Program</b>
<b>Implementation partner:</b>	<b>Ministry of Environment and Sustainable Development (MAyDS)</b>

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San Jose, Costa Rica, June 2023.

## ii. Table of contents

Acknowledgment.....	2
ii. Table of contents.....	3
iii. Acronyms.....	5
1 Executive Summary .....	6
1.1 Project Information Table.....	6
1.2 Project description .....	6
1.3 Project Progress Summary .....	7
1.4 MTR assessments and achievements.....	8
1.5 Summary of findings.....	9
1.6 Recommendations Summary Table.....	10
2 Introduction.....	12
2.1 Purpose and objectives of the mid-term review.....	12
2.2 Scope and methodology.....	12
2.2.1 Scope .....	12
2.2.2 Methodology .....	13
2.2.3 Methodology Limitations .....	13
2.3 MTR Report Structure .....	13
3 Project description and development context.....	16
3.1 Development context.....	16
3.2 Problems the project tried to address: threats and barriers .....	17
3.3 Project description and strategy .....	17
3.4 Project execution mechanisms.....	18
3.5 Project schedule and milestones.....	19
3.6 Main Stakeholders.....	20
4 Findings.....	21
4.1 Project Strategy .....	21
4.1.1 Project Design.....	21
4.1.2 Results framework/logical framework .....	22
4.2 Progress towards the achievement of results.....	22
4.2.1 Progress made in analyzing the results. ....	22
4.2.2 Obstacles that remain to achieve project objectives. ....	33

4.3	Project execution and adaptive management .....	33
4.3.1	Management mechanisms .....	33
4.3.2	Work planning .....	34
4.3.3	Financing and co-financing .....	34
4.3.4	Project-level monitoring and evaluation systems .....	37
4.3.5	Stakeholder involvement .....	38
4.3.6	Social and Environmental Standards (Safeguards) .....	38
4.3.7	Reports .....	38
4.3.8	Communication and Knowledge Management .....	39
4.4	Sustainability .....	40
4.4.1	Financial risks for sustainability .....	41
4.4.2	Socio-economic risks to sustainability .....	41
4.4.3	Sustainability risks related to the institutional framework and governance .....	42
4.4.4	Environmental risks to sustainability .....	42
5	Conclusions and recommendations .....	43
5.1.1	Conclusions .....	43
5.1.2	Recommendations .....	44
6	Anexos .....	46
6.1	Anexo en archivo separado: Términos de referencia del MTR .....	46
6.2	Matriz de evaluación del MTR .....	47
6.3	Escalas de valoración .....	50
6.4	Lista de personas entrevistadas .....	52
6.5	Lista de documentos revisados .....	54
6.6	Tabla de cofinanciación .....	55
6.7	Formulario firmado del Código de Conducta de UNEG .....	56
6.8	Formulario de aprobación del informe final del MTR .....	57
6.9	Estructura de Organización del Proyecto .....	58
6.10	Anexo en archivo separado: Rastro de auditoría .....	59

### iii. Acronyms

BFR	Brominated Flame Retardants
COFEMA	Consejo Federal de Medio Ambiente/Federal Council of the Environment
POPs	Persistent Organic Pollutants
PPE	Personal Protective Equipment
ESMF	Environmental and Social Management Framework
ESMP	Environmental and Social Management Plan
GEF	Global Environment Facility
GEFSEC	Global Environment Facility Secretariat
GMC	Common Market Group
Hg	Mercury
INAL	Instituto Nacional de Alimentos/National Food Institute
INAM	Instituto Nacional de las Mujeres/National Women Institute
INTI	Instituto Nacional de Tecnología Industrial/National Institute of Industrial Technology
LCM	Life Cycle Management
M&E	Monitoring and Evaluation
MAGyP	Ministerio de Agricultura, Ganadería y Pesca/Ministry of Agriculture, Livestock and Fisheries
MAYDS	Ministerio de Ambiente y Desarrollo Sostenible/Ministry of Environment and Sustainable Development
MERCOSUR	Mercado Común del Sur/Southern Common Market
MIA	Minamata Initial Assessment
BEP	Best Environmental Practices
MRECI	Ministry of Foreign Affairs, International Trade and Worship
BAT	Best Available Technologies
UNIDO	United Nations Industrial Development Organization
HHP	Highly Hazardous Pesticides
PBDEs	Polybrominated Diphenyl Ethers
PCBs	Polychlorinated Biphenyls
SCCP	Short Chain Chlorinated Paraffins
PFOS	Perfluorooctane Sulfonic Acid
PIF	Project Identification Form (GEF)
PIOD	Plan Nacional de Igualdad de Oportunidades y Derechos/National Plan for Equal Opportunities and Rights
PIR	GEF Project Implementation Report
NIP	National Implementation Plan
UNDP	United Nations Development Program
UNDP-GEF	Global Environmental Finance Unit of the United Nations Development Program
UNEP	United Nations Environment Program
POAGIR	Plan Operativo Anual para la Gestión Integral del Riesgo/ Annual Operating Plan for Comprehensive Risk Management
POPP	Policies and Procedures for Operations and Programs
PPG	Project Preparation Grant (GEF)
PyME/SME	Pequeña y Mediana Empresa/Small and Medium Enterprise
WEEE	Waste Electrical and Electronic Equipment
REDFEMA	Red Federal de Monitoreo Ambiental/Federal Network for Environmental Monitoring
REDNALAB	Red Nacional de Laboratorios/National Network of Laboratories
REMAQUA	Red de Monitoreo de Ecosistemas Acuáticos/Aquatic Ecosystem Monitoring Network
RETCRELSC/PRTR	Registro de Emisiones y Transferencia de Contaminantes/Registry of Emissions and Transfer of Pollutants
SAICM	Strategic Approach to International Chemicals Management
SENASA	Servicio Nacional de Sanidad y Calidad Agroalimentaria/National Agrifood Health and Quality Service
SESP	Diagnóstico Social y Ambiental/Social and Environmental Diagnosis
GHS	Globally Harmonized System
SMC	Gestión Ambiental de los Productos Químicos/Environmental Management of Chemical Products
STAP	Grupo de asesoramiento científico y técnico del FMAM/GEF Scientific and Technical Advisory Group
TAO	Trenes Argentinos Operaciones/Argentine Trains Operations
TdC	Teoría del Cambio/Theory of Change
FE	Final Evaluation
MT	Metric Tons

# 1 Executive Summary

## 1.1 Project Information Table

Project's name:	"Environmentally sound management of POPs, mercury and other hazardous substances in Argentina"		
ID, UNDP-GEF PIMS+:	6281	PIF approval date:	December 20, 2018
GEF Project ID:	10094	CEO authorization date:	February 24, 2020
ATLAS Business Unit, Project ID File (Award # Project ID)	00117927	Project Document (ProDoc) signing date (project start date):	January 01, 2020
Country or countries	Argentina	Project coordinator hiring date:	October, 2020
Region:	Latin America and Caribbean	Startup workshop date:	October 13, 2020
GEF Operation Area	Chemicals and Waste	Midterm Review Completion Date:	June 16, 2023
Strategic objective of the GEF's area of action:	CW-1-1, CW-1-2	Expected Completion Date:	January 01, 2026
Trust fund [indicate GEF TF, LDCF, SCCF, NPIF]:	GEF	If revised, new proposed completion date	July 15, 2023
Implementing Agency/ Implementing Partner:	Ministry of Environment and Sustainable Development (MAyDS)		
Other Implementation Partners:	Ministry of Foreign Affairs, International Trade and Worship (MRECIIC) National Agrifood Health and Quality Service (SENASA) Ministry of Industry and Ministry of Commerce Ministry of Labor and Department of Occupational Hazards (SRT) Ministry of Health Local Governments National Institute of Industrial Technology (INTI) Private sector Academy Civil Society Organizations (OSC)		
Project financing	as of CEO authorization date (US\$)	as of the Midterm Review date (US\$)*	
[1] GEF funding:	USD\$8.930.250	USD\$2.170.502	
[2] UNDP contribution:	USD\$200.000	USD\$40.000	
[3] Government:	USD\$13.434.418	USD\$5.196.856	
[4] Other partners:	USD\$34.040.791	USD 9.919.118	
[5] Total co-financed [2 + 3+ 4]:	USD\$47.675.209	USD \$15.155.974	
<b>TOTAL PROJECT COST [1 + 5]</b>	<b>USD\$56.605.459</b>	<b>USD\$17.326.476</b>	

\*The amounts indicated correspond to the first quarter of the year 2023

## 1.2 Project description

The full-scale project "Environmentally Sound Management of POPs, Mercury and Other Hazardous Substances in Argentina" (PIMS6281) was designed to minimize the risk posed by POPs, mercury and other hazardous

chemicals by improving the effective management throughout their life cycle to protect the health of living beings and the environment, as well as to ensure that Argentina meets its commitments by ratifying the Stockholm Convention on Persistent Organic Pollutants and the Minamata Convention on Mercury. It was approved by the Global Environment Facility (GEF) to be implemented by the Government of Argentina, with support of United Nations Development Program as the implementing agency.

The project includes the disposal of 5,000 metric ton (MT) of PCBS waste, training of transformer maintenance workshops to minimize cross-contamination and will implement measures to ensure that the country meets the deadlines set by the Stockholm Convention for the elimination of PCBS inventories. In addition, it will support the environmentally safe treatment or disposal of 370 MT of mercury (350 MT of elemental mercury from the mining sector, 20 MT of mercury-containing wastes) as well as the management of 100 MT of obsolete POPs pesticides and Highly Hazardous Pesticides (HHPs), as well as the sound management and disposal of pesticide packaging.

To achieve these goals, the project has a budget of US\$47,675,209, which includes US\$8,930,250 as a contribution from the Global Environment Facility, US\$13,434,418 as counterpart from the Argentine Government, US\$34,040,791 as counterpart from the private sector and US\$200,000 from UNDP as co-financing for the project.

All these activities will add to national efforts to achieve the SDGs, particularly: i.) SDG 3 “Health and well-being”; ii.) SDG 5 “Gender Equity”; iii.) SDG 6 “Clean Water and Sanitation”; iv.) SDG 9 “Industry”; v.) “Innovation and Infrastructure” SDG 11 “Sustainable Cities and Communities”; vi.) SDG 12 “Responsible Consumption and Production” and; vii.) SDG 14 “Underwater Life”.

In order to achieve the objective and the goals set, the project will develop actions through four components, namely:

1. Institutional strengthening of government and other stakeholders for the environmentally sound management of hazardous substances and their disposal
2. Improved management and elimination of POPs (except PCBS), highly toxic chemicals and mercury:
3. Environmentally sound management and disposal of PCBS:
4. Knowledge management and M&E

### 1.3 Project Progress Summary

The project was designed to be implemented over a period of 6 years (January 2020 to January 2026), however, for reasons beyond the project coordination’s control (change in government authorities, Covid-19 pandemic with the isolation measures established at national and global level) the process of consolidating the Local Project Document was completed until August 14, 2020, with the first meeting of the Local Project Appraisal Committee (LPAC) and the signing of the Project Document. For this reason, the implementation began in September 2020, with the kick-off workshop held on October 3 of the same year.

In accordance with the provisions of the project document, a Steering Board was formed consisting of a representative of the Coordination and External Planning Department of the Ministry of Foreign Affairs and Worship as the coordinating body of the Government, a representative of UNDP and a representative of the Secretariat for the Environment and Sustainable Development as the implementing partner, which has held annual meetings to take decisions on the implementation of the project.

The project, under an adaptive management approach, has carried out the necessary revisions in the annual work plans, revision of the document and adaptation of the budget according to the new work plan, professionals were incorporated to form the work team by topic, this as measures to recover the 11 months lost at the beginning of the project.

During 2020, the project focused on the formation of the work team, giving continuity to the consultants who participated in the preparatory phase, also, other consultants were hired in the technical and administrative areas. In line with the activities established in the project, working groups were consolidated for the four main areas (Regulatory, PCBS, Analytical Capacity and Environmental Monitoring, and Gender). Despite the delay in starting the project, 491 MT of PCBS and 100.7 MT of mercury were managed.

To date, the project has made significant progress in the various components, especially in the objectives related to the management of inventories of PCBS, mercury and highly hazardous pesticides, exceeding the established objectives. Regarding the gender approach, the project has made significant progress in linking environmental policies with gender policies. For the first half, the project has significantly reached the target groups, namely the public sector, the private sector and academia, at the local, provincial and national levels.

#### 1.4 MTR assessments and achievements

Parameter	MTR Rating	Achievement Description
Project strategy	N /A	
Progress towards the achievement of results	<p><b>Objective:</b> To minimize the risk to human health and the environment posed by POPs, mercury and other hazardous chemicals and to promote compliance with the Stockholm and Minamata Convention in Argentina.</p> <p><b>Highly satisfactory (HS)</b></p>	The project has exceeded the objectives set for the achievement of the overall project objective
	<p><b>Outcome 1:</b> Improved legal framework and improved capacity (monitoring and analysis) for the implementation and enforcement of the Convention.</p> <p><b>Satisfactory (S)</b></p>	The project has complied with three regulations developed and published through National Resolutions. Staff has been contracted to carry out the established activities.
	<p><b>Outcome 2:</b></p> <p>2. 1. National Hazardous Chemicals Management Strategy implemented and national PRTR operationalized.</p> <p>2. 2. 370 MT of mercury-containing wastes, 100 MT of obsolete pesticides (POPs, HHPs) and pesticide packaging disposed.</p> <p><b>Highly Satisfactory (HS)</b></p>	The project has met the goals established in the mid-term, significantly exceeding one of the established indicators.
	<p><b>Outcome 3:</b></p> <p>5000 MT of PCBS removed.</p> <p><b>Satisfactory (S)</b></p>	<p>The established goal of 2,000 MT of PCBS destroyed has been exceeded by 50%, however, the inventory updated by the project corresponds mainly to the public sector, particularly large owners, a greater number of private sector owners has not been included in the process of updating the national inventory of PCBs.</p> <p>The 4th Quarterly Report for 2022 indicates that a draft version of the Good Practice and Safe Management Guidance for PCB Contaminated Electrical Equipment for use in maintenance</p>



		workshops is available. No evidence at the time of evaluation of your publication because it is under review.
	<p style="text-align: center;"><b>Outcome 4:</b></p> <p>Awareness-raising for 4,800 people (2,600 women and 2,200 men) on sound chemicals management</p> <p style="text-align: center;"><b>Highly Satisfactory (HS)</b></p>	The objectives set have been significantly exceeded and the gender perspective has been adequately incorporated into the awareness-raising process and into the policies developed.
Implementation and adaptive project management	<b>Highly Satisfactory (HS)</b>	Despite the delays presented at the beginning of the project, adaptive management has made it possible to recover time and meet the established goals. Administrative management has been favorable. Adaptive management has been achieved that will allow the project to move forward in the second half of the year without major difficulties.
Sustainability	<b>Moderately likely (ML)</b>	Overall, the risks to financial, socio-economic and environmental sustainability are significant given the economic conditions facing Argentina. The political risk associated with a change of government is moderate and could lead to changes in the structure of the project.

## 1.5 Summary of findings

- The project was well formulated, meets the national needs for the fulfillment of the commitments made within the framework of international conventions (POPs and Mercury) and at the same time allows the continuity of activities developed in previously executed projects, such as the UNDP project # 3744 "Environmentally sound management and elimination of PCBs in Argentina".
- The Project's success meeting most of the goals set for this period is due to a very well executed coordination with the accompaniment of a technical team according to the needs.
- The active participation of MAyDS as executing agency/partner in implementation has been fundamental to the achievement of the results obtained. The commitment shown by MAyDS and other institutions of the Argentine State has enabled significant progress to be made in meeting the established goals.
- The public institutions have internalized the project, taking it as their own and showing a level of commitment and interest in it that facilitates the implementation of the established activities and promotes the achievement of the established objectives.
- Argentina's current economic and political context made it more difficult to procure goods and services, but coordination had acted under an adaptive management approach that had enabled it to make significant progress and aimed at increasing the percentage of the budget implemented in the second half of the project. Despite the difficulties encountered, the project has managed to eliminate significant quantities of obsolete PCBs and pesticides such as DDT from public institutions. As well as the contribution of the private sector to the elimination of mercury, which was a private initiative that forms part of the co-financing for the achievement of the objectives set within the framework of this project.
- UNDP has supported the project team to achieve adaptive management in the face of multiple delays in the procurement processes resulting from the economic reality of Argentina and the obtaining of export permits in compliance with the Basel Convention.
- UNDP is committed to MAyDS and has provided support on several occasions by training government staff in UNDP/GEF processes to ensure the success of the project. This effort is important and very positive.

8. The design and implementation of a gender and communication action plan has been a challenge, but it has been possible to incorporate the elements of inclusion not only into training activities, but also to incorporate this approach across the various activities associated with chemicals management, including vulnerable populations such as the transgender population.
9. Despite the delays that the project has faced in the first year of implementation, with the local approval process of Prodoc, and the entry of the Covid-19 pandemic, the project has adjusted its management, achieving significant progress, even beyond the objectives set for the mid-term.
10. Successful achievement of mid-term objectives can be attributed to the project team's management of mobilizing committed resources, both from the public and private sectors. In the absence of three years before closure, it is clear that the project will meet the co-financing levels committed to the GEF; however, it is recommended that the processes of monitoring and accounting for co-financing be improved, allowing for better traceability.

## 1.6 Recommendations Summary Table

No.	Recommendation	Responsible
1	<p><b>Safeguards for government transition process.</b></p> <p>A presidential election process will be held this year, so the project needs to establish a communication strategy for the incoming authorities, which will make it possible to visualize the benefits of the project at the local, national and global levels. UNDP support is important in this process. This strategy should be geared towards ensuring the continuity of the activities set out in PRODOC.</p>	MAYDS UNDP Project team
2	<p><b>Ensure the sustainability of the project.</b></p> <p>Establish a clear sustainability strategy to strengthen the institutional capacities of project partners. As well as continuity by the private sector in the environmentally sound management of hazardous chemicals and their wastes, which form part of its operations.</p>	UNDP Project team
3	<p><b>Strengthen and intensify work with the private sector.</b></p> <p>Although the mid-term objectives have been achieved, it is important to intensify work with the private owners of PCBS, highly hazardous pesticides, pesticide packaging and mercury, which have not been incorporated to date, so to achieve the objectives set at the end of the project it is necessary to incorporate them into the process through a strategy.</p>	Project team
4	<p><b>Extend the scope of the national inventory of PCBS.</b></p> <p>As of the date of this assessment, the PCBS inventory includes mostly the public sector and a small part of the private sector, focusing on large owners, it is recommended for the second half of the project to extend the scope of this inventory to include small private and public sector owners that have not been included at the time of this assessment.</p>	Project team
5	<p><b>Establish a training plan for maintenance workshops of equipment with PCBS.</b></p> <p>The project has a Guideline for Best Practices in Hazardous Waste Management published; however, it is recommended that a training plan be established to achieve the established goal, with the aim of minimizing cross-contamination of equipment during the maintenance process of such equipment.</p>	Project team
6	<p><b>Diversify treatment/decontamination alternatives for PCBS equipment.</b></p> <p>Currently, the project has focused efforts on the export of inventories contaminated with PCBS, this evaluator recommends expanding treatment options by analyzing on-site dechlorination technologies for concentrations that allow it, as a more economical and easy-to-implement alternative. This option would reduce the time required to obtain</p>	Project team

	international transit permits under the Basel Convention and increase the volume of equipment and oils treated.	
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## 2 Introduction

### 2.1 Purpose and objectives of the mid-term review

As set out in the Terms of Reference (ToR) the purpose of this evaluation is to assess the progress made towards achieving the project objectives and results specified in the project design document and will assess the first signs of success or failure of the project in order to Determine the changes needed to put the project on track to achieve the expected results, in addition to meeting the following objectives:

- a. Addressing particular issues or problems in the design of the project, identifying possible problems or problems in the design of the project;
- b. Addressing particular issues or problems related to the implementation of the project;
- c. Address particular issues or problems related to project management.
- d. To assess progress towards the achievement of goals and objectives;
- e. Identify and document initial lessons learned from the experience (including lessons that could improve the design and implementation of other projects of the Livelihoods and Resilience Unit (L&R));
- f. Identify additional risks (not part of the current risk register, if any) and countermeasures;
- g. Make recommendations and assist decision-making on specific actions that could be taken to improve the project and strengthen initiatives that demonstrate the potential for success;
- h. Find out the impact of COVID-19 on the project and propose any necessary changes to the project document due to COVID-19.

This evaluation will analyze the following aspects of the project:

- I. Relevance.
- II. Efficiency.
- III. Effectiveness.
- IV. Sustainability of the results.
- V. Achievement of project expected impacts.
- VI. Contribution to the expected effects.

### 2.2 Scope and methodology

#### 2.2.1 Scope

For this evaluation, the methodology for mid-term evaluations specified in the UNDP/GEF project evaluation guide was implemented<sup>1</sup>.

To achieve this objective, the matrix of evaluation questions developed by UNDP Argentina and included in the terms of reference of this consultancy was analyzed and expanded. Without prejudice to the foregoing, the different stages of the project (design, implementation), as well as the financial and adaptive management during the evaluation period from January 2020 to March 2023, were analyzed.

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<sup>1</sup> “Guide to Conducting the Mid-term Review of UNDP-Supported and GEF-Funded Projects”; UNDP-GEF Directorate 2014, United Nations Development Program, <http://web.undp.org/evaluation/guidance.shtml#handbook>

The collection of information will be carried out in accordance with the following activities:

- I. Project documentation (AWP, quarterly reports, studies conducted, interviews, PIR, Prodoc, Audits).
- II. Contextual (government policies and plans, municipal plans, economic and social sector studies).
- III. Integration with other activities and policies (similar complementary projects under implementation, UNDP and government policies, municipal plans, budgets of organizations, municipalities and ministries).
- IV. Baseline information and project situation (preliminary studies, monitoring and control reports, use of tracking tools, interviews).

### 2.2.2 Methodology

The methodology for collecting and analyzing the information shall be as follows:

- I. **Document review:** analysis of the project document, as well as project progress reports and other publications derived from project activities.
- II. **Key informant interviews:** interviews will be conducted with the project team, UNDP staff, key actors, including: Ministry of Environment and Sustainable Development (MAyDS) as executing agency and Ministry of Foreign Affairs, International Trade and Worship (MRECIC), National Health and Food Quality Service (SENASA), Secretariat of Industry and Secretariat of Trade Ministry of Labor and Occupational Risks Department (SRT), Ministry of Health, Local Governments, National Institute of Industrial Technology (INTI), Sector Academia, Organizations Civil Society (CSO), among others who identify themselves during the review of documents.
- III. **A series of open and semi-structured questions:** asked to key people directly and indirectly related to the Project, using in-depth interviews.
- IV. **Focus group interviews:** may be conducted with municipal managers, as well as with a technical group, whose specific objective would be to analyze the indicators, results, outputs and activities of the project, in order to know whether they are measurable, relevant and appropriate.

The cross-reference of information will occur when identifying key situations in the context of project implementation, with the information provided in the interviews, progress reports and other publications, in such a way that the conclusions obtained are balanced and as objective as possible to avoid bias on the part of the informants.

### 2.2.3 Methodology Limitations

The main limitation of this evaluation is that having personal information from the interviewees that could be dissimilar and/or partial (informant bias), it can lead to judgments that will have to be fairly evaluated by the evaluator. In this regard, participatory evaluation can help to minimize any risk of lack of objectivity or imbalance of information.

## 2.3 MTR Report Structure

For the analysis of the achievement of results, the **Results Progress Assessment Matrix**, Table No. 2. 1 (See section 4. 2, table 4. 1, complete matrix) which includes the mid-term and end-of-term indicators and objectives of the project, which were assessed according to what is indicated in the UNDP mid-term evaluation guide, using as a source of information the Project Implementation Reports (PIR) for the years 2020 and 2021.

**Table No. 2.1. Results progress assessment matrix**

Project Strategy	Indicator	Initial reference level	Mid-Term Goal	End of Project Goal	Midterm Level and Assessment	Assessment of achievements	Valuation justification
Goal							
Outcome 1:	Indicator 1:						
	Indicator 2:						
Outcome 2:	Indicator 1:						
	Indicator 2:						
Etc.							

Indicator Assessment Code

Green= Achieved	Yellow = On track to be achieved	Red = Not on track to be achieved
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Finally, the project was rated in the summary table of assessments and achievements of the MTR according to the following scheme (see table 2. 2) and the results obtained are shown in section 1. 4 of this report.

**Table No. 2. 2. Summary of assessments and achievements of the MTR**

Parameter	MTR rating	Achievement Description
<b>Project Strategy</b>	N/A	
<b>Progress in achieving results</b>	Assessment of the extent to which the objective has been achieved. Achievement Rating: (Rate according to a 6 pt scale)	
	Assessment of the degree of achievement of result 1: Achievement Rating: (Rate on a 6 pt. scale)	
	Assessment of the degree of achievement of result 2 Achievement Rating: (Rate on a 6 pt. scale)	
	Assessment of the degree of achievement of result 3: Achievement Rating: (Rate on a 6 pt. scale)	
<b>Project execution and adaptive management</b>	(Rate on a 6 pt scale)	
<b>Sustainability</b>	(Rate on a 4 pt scale)	

The Evaluation Matrix for the MTR (table No. 2.3) will be used, which is included in the "Guide for the Mid-Term Examination in Projects Supported by the UNDP and Financed by the GEF", which establishes the evaluation criteria, indicators, sources and methodology for each of the aspects to be evaluated, project strategy, progress in achieving results, execution and adaptive management, and sustainability. Below is an extract of this matrix (see complete matrix in Annex 6.2).

**Table No. 2.3 MTR evaluation matrix.**

Evaluation criteria – Questions	Indicators	Sources	Methodology
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Project strategy: To what extent is the project strategy relevant to national priorities and country ownership? Is it the best way to get the results?			
- How does the project support UNDP and GEF strategic priorities?	- There is a clear link between project objectives and UNDP/GEF strategic priorities.	- Project documents - UNDP/GEF strategies and documents.	- Document analysis. - Interviews with UNDP staff and the project team.
Progress towards achieving results: How well have the desired results and objectives been met so far?			
Project execution and adaptive management: Has the project been implemented so far efficiently, cost-effectively and adapted to changing conditions? To what extent do the monitoring and evaluation, information and communication systems of the project contribute to its implementation?			
Sustainability: To what extent are there financial, institutional, socio-economic and/or environmental risks to the long-term sustainability of the project results?			



## 3 Project description and development context

### 3.1 Development context

Argentina has adopted and ratified the Stockholm Convention on Persistent Organic Pollutants by Act No. 26,011 and has also ratified all its amendments. The same has happened with the Minamata Convention on Mercury, through Law 27.356 in 2013, Argentina adopted this international Convention.

Argentina's ratification of these conventions represents important challenges to be met. Within the framework of the Stockholm Convention, thanks to the efforts made, the management and disposal of PCBs has been identified as a priority (NIP, 2007), the need for a strategy for the elimination of PCBs, harmonization of standards at the federal level, and more effective monitoring of compliance with the strategy were recommendations emanating from the evaluation of the project on the sound management and disposal of PCBs in Argentina (2018). In the same year, as part of the update of the NIP, the need for a technical and economic feasibility study and support to industry in phasing out or phasing out the use of priority hazardous chemicals was identified.

Under the Minamata Convention, it was determined as a priority to improve the management, collection, treatment and final disposal of wastes that contain mercury or mercury compounds (MIA, 2018), the main obstacles being the generation of elemental mercury derived from mining, gold mining and the production of mercury waste by a chlor-alkali plant.

To achieve the goal set by the project, two fundamental causes must be analyzed; i.) Argentina does not have sufficient institutional capacity in terms of regulatory and regulatory framework and its capacity for monitoring, analysis and control to ensure effective Life Cycle Management (LCM) of harmful chemicals and substances; and ii.) there is insufficient technical capacity for the environmentally sound disposal and destruction of POPs/PCBs/HHP/Hg/phytosanitary packaging and other hazardous chemicals and substances to ensure compliance with international conventions.

Within this national context, the project proposes a number of activities to strengthen or create, as necessary, national capacities for the proper management of hazardous chemicals throughout the life cycle, with particular emphasis on POPs, mercury and highly hazardous pesticides, addressing the impacts of these substances on different vulnerable groups, under a gender approach that has not been developed at the national level.

Although not reflected in the Project document, it also contributes to the overall goal of the Strategic Approach to International Chemicals Management (SAICM), which supports advancing the goals agreed at the 2002 World Summit on Sustainable Development in Johannesburg by ensuring that, by 2020, chemicals are produced and used in ways that significantly minimize impacts on the environment and human health.

The development of the project also promotes the achievement in Argentina of the following Sustainable Development Goals: i). **SDG 3 “Health and Well-being”**, which protects local, regional and global populations from the effects of hazardous chemicals and substances to health; (ii) **SDG 5 “Gender Equity”**, which promotes the gender perspective; (iii) **SDG 6 “Clean Water and Sanitation”**, which protects water resources from pollution; (iv) **SDG 9 “Industry, Innovation and Infrastructure”**, to enable industry to reduce its harmful emissions; (v) **SDG 11 “Sustainable Cities and Communities”**, to make cities and human settlements inclusive, safe, resilient and sustainable; (vi). **SDG 12 “Responsible Consumption and Production”**, to phase out products containing harmful substances; (vii). **SDG 14 “Underwater Life”**, to protect marine life from exposure to chemicals and hazardous wastes.



### 3.2 Problems the project tried to address: threats and barriers

According to the Project's theory of change, which is associated with the two fundamental causes (I) the country does not have sufficient institutional capacity in terms of the regulatory and normative framework and its capacity for monitoring, analysis and control to ensure effective Life Cycle Management (LCM) of harmful chemicals and substances; II.) there is insufficient technical capacity for the environmentally sound disposal and destruction of POPs/PCBS/HHP/Hg/phytosanitary packaging and other hazardous chemicals and substances to ensure compliance with the Conventions, the project addresses 7 immediate causes: i). A legal framework lacking tools to strengthen the life-cycle management of hazardous substances and the fulfilment of obligations under adopted international conventions; (ii) There is no strategic and financial planning at national level for the management of PCBs, including smallholders and the public sector, to allow for the elimination of the total inventory of PCBs.; iii). Lack of experience in disposing of wastes containing POPs, Hg, HHPs, obsolete wastes and agrochemical packaging to comply with existing legislation; (iv) Lack of analytical and public sector capacity to analyze, monitor and support compliance with the Conventions; (v) Limited capacity of industry for technological change to phase out POPs and Hg; (vi) Lack of public information systems to monitor compliance with legislation; vii). Lack of awareness and opportunities for stakeholder training and capacity building on the Sound Management of Chemicals (SMC) that impede both the introduction of Best Environmental Practices/Best Available Technologies (BEP/BAT) and safer practices and alternatives.

The stocks of POPs, Hg, HHP and obsolete identified in Argentina represent a threat to health and the environment. These substances represent challenges with respect to environmentally safe management, control and disposal, the project seeks to improve the conditions for proper management of inventories identified in the update of the NIP of the Stockholm Convention and the Initial Assessment of Minamata (IIA) of 2018, which determined:

- An estimate of 15000 MT of oils and equipment contaminated with PCBs.
- 100 MT of obsolete and highly hazardous POPs and pesticides
- 17 million pesticide containers used per year (13,000 MT)
- Production of 70 MT of Hg per year by a gold mine and 400 MT of Hg stored.
- Hg residues produced by a chlor-alkali silver.

In addition, the project seeks to support Argentina in the development of institutional, regulatory and technical capacities to achieve the environmentally sound management of the life cycle of all hazardous substances and chemicals, the establishment of a strategy for the management of hazardous substances and chemicals that will improve aspects related to the management of these substances and the incorporation of safer alternatives, the management of contaminated sites and improved risk management. Lastly, efforts are being made to improve monitoring and control capacity through a program to monitor chemicals and to create databases on pollutant emissions/releases and to update inventories to enable compliance with laws and conventions.

### 3.3 Project description and strategy

The Project, led by the Ministry of Environment and Sustainable Development (MAyDS) addresses the two structural causes and the 7 immediate causes with the aim of **Minimizing the risk posed by POPs, mercury and**

**other dangerous chemicals for human health and the environment and promote compliance with the Stockholm and Minamata Convention in Argentina**, through 4 components:

- **Component 1: Institutional strengthening of government and other stakeholders for the environmentally sound management of hazardous substances and their disposal**

Seeks to ensure that Argentina has a legal framework for the management of chemicals in line with the requirements and commitments made by the country under the various international conventions and to establish the legal instruments required for greater understanding between the public and private sectors. To improve national analytical capacity to carry out national monitoring, control and control activities, as well as to generate knowledge for the incorporation of best practices in the management of chemicals. This component is expected to: i.) develop eight (8) policies, norms and/or standards; ii.) Development of analytical capacities and implementation of the Monitoring Plan for Chemicals and Substances.

- **Component 2: Improved management and elimination of POPs (except PCBS), highly toxic chemicals and mercury:**

It aims to gain insights into the challenges ahead, establish robust and proven data systems to capture key information, develop strategies to address identified challenges, and implement large-scale pilot projects to demonstrate how phasing out, destroying and remediation work in practice to gain first-hand knowledge and to be able to repeat the experiences in the future. Under this component, the following is sought: i.) Develop/update the National Implementation Plans and update the inventories of POPs and unintentional POPs and mercury; ii.) develop a national PRTR system; iii.) develop and establish a National Strategy for the Management of Hazardous Chemical Substances and Products; iv) develop a strategy for the identification, management and remediation of contaminated sites; v) prepare a technical and economic feasibility study for possible substitutes for new/industrial POPs and other hazardous chemical substances and; vi) implement four (4) pilot projects to achieve the elimination of 370 MT of mercury, 100 MT of pesticides and discarded phytosanitary containers.

- **Component 3: Environmentally Sound Management and Disposal of PCBS**

It expects to improve Argentina's capacity in order to comply with the obligations established in the Stockholm Convention in regards to PCBS management, through: i.) Updating the national PCBS inventory; ii.) assess the existing national capacity for the treatment/elimination of PCBS; iii.) design a financial plan that optimizes the elimination of PCBS stocks in the hands of small holders; iv.) update the National Management and Elimination Strategy; v) develop guidelines and train maintenance workshops on how to minimize cross contamination; vi) support the elimination of 5,000 MT of waste containing PCBS.

- **Component 4: Knowledge management and M&E**

Seeks to engage and generate awareness among interested parties about the importance of life cycle management of hazardous substances and chemical products, incorporating those parties that were not participants in the previous project, such as some provinces and small holders, for which they were designed. activities in three interventions: 1) create and disseminate information; 2) encourage cooperation; and 3) improve capabilities.

### 3.4 Project execution mechanisms

The project is implemented under the National Implementation Modality (NIM) with UNDP as the implementing agency. The Ministry of Environment and Sustainable Development (MAyDS) is the Implementing Partner for

this project, the Government of Argentina national counterpart responsible for the administration of this project, monitoring and evaluation of project interventions, compliance with project results, and the effective use of UNDP resources.

The governance structure established for the project includes a Project Board of Directors (PBD) conformed by: Secretariat for Foreign Coordination and Planning; Ministry of Environment and Sustainable Development and the Resident Representative of UNDP; the Ministry of Environment and Sustainable Development -as partner in the implementation- will be the chair of this Board. Additionally, a Project Director, the Coordination and the technical team of the project were established (See organizational chart in Annex 6.9).

The Project Board will be responsible for: a) approving and signing the Multi-Year Work Plan, b) monitoring the development of the Project, c) approving the budgetary and substantive revisions, and d) approving the technical and financial reports. They will meet at least once per year, and eventually when any members require it.

The Secretariat for Foreign Coordination and Planning participates in the Project's Board of Directors as Government Coordinating Body to guarantee the alignment of the project with national priorities and is responsible for the general supervision and the achievement of the project's products.

The National Directorate of Hazardous Substances and Waste, as the substantive area that deals with the application of MEAs on chemicals and waste, and the General Directorate of Projects with External Financing and International Cooperation, as the technical/operational focal point of the GEF/GEF, both dependent on the MAyDS, will provide technical assistance to the Board of Directors.

The Project Board of Directors is responsible for taking corrective actions, as necessary, to ensure that the project achieves the desired results. To guarantee the ultimate responsibility of UNDP, the decisions of the Project Board should be made in accordance with standards that ensure management aimed at achieving development results, better value for money, fairness, integrity, transparency and effective international competition.

### 3.5 Project schedule and milestones

The project was designed to be implemented over a period of 6 years between January 1, 2020 and January 1, 2026, however, there were delays in its own procedures at the national level that led to the official start of the project on August 14, 2020 when the consolidation of the Local Project Document was achieved, the LPAC meeting was held and the subsequent signing of the Project Document. Implementation began in October of the same year. The initiation workshop was held on October 13, 2020.

The project objective of ***“minimizing the risk of POPs, mercury and other hazardous chemicals to human health and the environment, and promoting compliance with the Stockholm and Minamata Conventions in Argentina”*** will be achieved by achieving the following expected outputs:

- Strengthened legal framework and enhanced capacity (monitoring and analysis) for the implementation and enforcement of the Conventions.
- National Strategy for the Management of Chemicals and Substances implemented and national operational PRTR.
- Disposal of 370 MT of waste with Hg, 100 MT of obsolete pesticides (POPs, HHPs) and pesticide packaging.

- Removal of 5,000 MT of PCBS.
- 4,800 individuals (2,600 women and 2,200 men) sensitized on sound chemicals management.
- 1,793,700 beneficiaries (921,401 women + 872,299 men).

### 3.6 Main Stakeholders

The following are identified as key stakeholders in the project:

- Ministry of Environment and Sustainable Development (MAyDS)
- Ministry of Foreign Affairs, International Trade and Worship (MRECIC)
- National Health and Food Quality Service (SENASA)
- Secretariat of Industry and Secretariat of Commerce
- Ministry of Labour and Occupational Risks Department (SRT)
- Ministry of Health
- Local Governments
- National Institute of Industrial Technology (INTI)
- Private sector
- Academy
- Civil Society Organizations (CSOs)

## 4 Findings

### 4.1 Project Strategy

#### 4.1.1 Project Design

The design of the project considered as the basis of its activities the progress achieved by projects previously implemented by the Ministry of Environment and Sustainable Development (MAyDS) in conjunction with the United Nations Development Program (UNDP), as well as the update of the 2018 National Implementation Plan for the Stockholm Convention.

The UNDP project #3744 “Environmentally Sound Management and Disposal of PCBs in Argentina” that culminated in 2017 established the following actions:

- i. Implement a strategy to eliminate PCBS at the national level.
- ii. Standardize the regulation and compliance with said strategy in the 23 provinces, with COFEMA as coordinator of the process.
- iii. Strengthen surveillance and law enforcement through a more effective and efficient strategy.

Prodoc is very clear in its definition of which are the priorities that the project must address, it adds to the actions listed above, it must comply with others such as: a legal framework with legal instruments that strengthen the Life Cycle Management of hazardous chemicals, the elimination of PCBs and other POPs throughout the country, the strengthening of laboratories with adequate training and according to the needs for the determination of PCBs and other POPs, among others.

From the reading of the documents and the interviews, this evaluator was able to verify that the components of the project are in accordance with the priorities established at the time of the preparation of the Prodoc and that, even after two years of the project, they are still in force as needs to be met in the country. The project in this first half of its development has strengthened and contributed to meeting some of these needs efficiently, although activities that will contribute to meeting them remain to be developed.

It is important to note that this project has been a driving force for strengthening the overall management of chemicals and hazardous waste in MAyDS. With its implementation, the project has built an installed capacity within the MAyDS that will be sustainable once it is completed. This achievement is due to the fact that its objectives, components and activities were designed in accordance with the needs identified by the institutions for due attention to environmental issues prioritized at the national level, as described on the basis of previous interventions carried out through other implemented projects.

Broadly speaking, the strategy outlined in the project document is being implemented, as allowed by the national context in which it has developed, the Covid-19 pandemic and the current political and economic context. To date, the implementation of the proposed strategy has led to significant progress in some of the components, such as:

1. **Component 1.** Elimination of significant quantities of equipment and oils containing PCBs, mercury from mining and obsolete pesticides (POPs/HHPs).
2. **Component 2.** The development and implementation of a National Strategy for the Management of Hazardous Chemicals and a strategy to implement PRTR developed.
3. **Component 3.** Established and operational registry of PCBs equipment owners.
4. **Component 4.** Activities carried out for the implementation of a gender communication strategy.

#### 4.1.2 Results framework/logical framework

The logical framework is very well developed and the indicators are all developed according to SMART criteria. The indicators are clear and measurable, which facilitates the evaluation of the results obtained at this time, the mid-term of the project.

The last column, Methodology and Risks of the collection is very useful to better understand where the presented information comes from and the possible risks of meeting the indicated goals. It is important to identify potential risks, although they are also detailed in the Risk Analysis and SESP.

The logical framework has enough information to develop workplans more easily. When reviewing the objectives achieved during this first half of the project, the way in which the indicators are described makes it a clearer exercise for this evaluator.

## 4.2 Progress towards the achievement of results

### 4.2.1 Progress made in analyzing the results.

Table 4. 1 Results Progress Assessment Matrix presents an analysis of each of the indicators and objectives set for the project objective and each of the four components, according to the expected result, evaluating it against the mid-term objective.

At the time of this assessment, the project is showing satisfactory results, exceeding the medium-term objective, such as tons of obsolete PCBs, mercury and pesticides (POPs and HHPs) that have been phased out. For most components, this evaluator rates medium-term achievements as highly satisfactory or satisfactory. Only in Component 3. Environmentally sound management and disposal of PCBs, indicator 3. 1 is rated moderately satisfactory. The reason for this qualification is because, although there has been significant progress in the process of compiling and updating the national inventory of PCBs with the established registry, this effort has been mainly focused on State institutions. The second half of the project is expected to broaden outreach to owners of PCBs-contaminated equipment and oils in the private sector and other government institutions.

For the second part of the project, it is expected that the Practical Guide for the Management of Hazardous Waste will be published and maintenance workshops will be able to rely on it to improve their equipment maintenance processes to avoid cross-contamination.

The evidence reviewed and the interviews conducted confirm that the project has made significant positive progress to this period with very good results and many opportunities to continue to achieve more achievements in line with the end-of-project goals.

In the comparative analysis of the GEF Tracking Tool/Core Indicators at the time of endorsement, and the results indicated prior to this MTR, significant progress has been made in reaching the goals set for the end of the project.

The following table illustrates the level of compliance with the corresponding Core Indicators:

Core indicator	% compliance at MTR
9. Reduction, elimination/destruction, elimination, disposal and avoidance of chemicals of global concern and their wastes in the environment and in processes, materials and products.	61,3%

<b>9.1.</b>	Removal or disposal of persistent organic pollutants (POPs) solids and liquids and materials and products containing POPs.	59,2%
<b>9.2.</b>	Reduced amount of mercury	96,2%
<b>9.3.</b>	Number of countries with legislation and policies in place for the control of chemicals and wastes.	100%
<b>10.1.</b>	Number of countries with legislation and policies in place for the control of chemicals and wastes.	100%
<b>10.3.</b>	Number of countries with legislation and policies implemented for the control of chemicals and waste.	100%
<b>11.</b>	Number of direct beneficiaries disaggregated by gender as a co-benefit of the GEF investment.	108,5%

The ratings and comments in this regard are set out in table 4. 1 below.



**Table No. 4.1 Matrix for evaluating progress in results**

Project strategy	Indicators	Baseline	Level in First PIR (self-reported)	Medium term goal	End of project objective	Level and mid-term evaluation	Rating of achievements	Justification of rating
<b>Objective:</b> Minimize the risk posed by POPs, mercury and other hazardous chemicals to human health and the environment and promote compliance with the Stockholm and Minamata Convention in Argentina.	Target indicator 1: Number of tons (TM) of PCBS; Disposal of pesticides (COP/HHP) and mercury-contaminated wastes	<i>15,000 metric tons (MT) of pure PCBS oils and PCBS-containing equipment</i>	<i>Removed/treated PCBS: 2876.03 MT</i>	<i>1,500 MT of PCBS</i>	<i>5,000 MT of PCBS;</i>	2,953.3 gross MT of PCBs removed (2,958.7 net MT)	<b>HS</b>	The objectives set for the overall objective of the project have been met satisfactorily, exceeding the levels expected in the medium term. It is important to note that for national economic reasons the final objective of 5000 MT will not be reached but will be increased in the medium term by means of on-site decontamination of equipment and oils with PCBS below 5000 PPM.
		<i>3 combined obsolete pesticide repositories holding approx. 100 MT of POPs and highly hazardous pesticides (HHP).</i>	<i>Pesticide removal/treatment (POP/HHP):1.18 MT</i>	<i>30 MT of pesticides (COP/HHP)</i>	<i>100 MT of pesticides (COP/HHP)</i>	37.82 MT eliminated from pesticides (POPs/HHPs).		
		<i>400 TM of stored Mercury (gold mine).</i>	<i>Hg removal/treatment: 205.48 MT</i>	<i>and 120 MT of mercury contaminate the waste was eliminated</i>	<i>and 370 MT of waste contaminated with mercury eliminated.</i>	Accumulated value:  356,078 MT from the mining sector		
	0	<i>Total beneficiaries: 1,945,510 (women: 1,013,132; men: 932,368; Non-binary: 8).</i>	<i>591,921 beneficiaries (304,062 women + 287,859 men)</i>	<i>1,793,700 beneficiaries (921,401 women + 872,299 men)</i>	Total beneficiaries: 3,705,200 people reached, (women: 1,852,576; men: 1,852,577; Non-binary: 47).			
<b>Component 1: Institutional strengthening of the government and other interested parties, for the environmental sound management of hazardous substances and their disposal</b>	Indicator 1.1: Number of policies, regulations and/or standards to strengthen the national legal framework to support the management of hazardous chemicals.	<i>Prodoc Annex N describes the legal framework in Argentina.</i>	<i>The Project has supported the development of three substantial regulations to date:</i> <i>1. Update of the National Registry of PCBS procedures (Resolution No. 355/2020 MAyDS).</i> <i>2. The National List of Existing, Restricted and Prohibited Substances is updated (Resolution No. 192/2019 SCyMA).</i> <i>3. Draft National Law for Risk Management of</i>	<i>Three (3) policies, regulations and/or standards developed/improved to strengthen capacities in LCM of hazardous chemicals</i>	<i>Eight (8) policies, regulations and/or standards developed/improved to strengthen capacities in LCM of hazardous chemicals</i>	1-Update of the National Registry of PCBS procedures (Resolution No. 355/2020 MAyDS) 2- National List of Existing, Restricted and Prohibited Substances" Resolution 504/2022 3- Draft National Law for Risk Management of	<b>S</b>	Three regulations have been developed and published through national Resolutions.



Project strategy	Indicators	Baseline	Level in First PIR (self-reported)	Medium term goal	End of project objective	Level and mid-term evaluation	Rating of achievements	Justification of rating
			<i>Chemical Substances consolidated within the Interministerial Board of Chemical Substances and Waste.</i>			Chemical Substances		
	Indicator 1.2: National and local capacity for monitoring and analysis of existing hazardous chemicals, measured by % of implementation of the Chemical Monitoring Program and number of personnel/laboratory technicians trained	REDNALAB (National Network of Environmental Laboratories) is a network of 30 public/private laboratories that can perform POPs analysis	<i>Chemical Products Monitoring Program designed and partially implemented (40%).</i>	Chemical monitoring program designed and 30% of the activities implemented in the Plan.  An analytical capacity building plan was designed and 15 staff/laboratory technicians were trained. trained 15 staff members/lab technicians	An analytical capacity building plan and chemical monitoring program have been implemented and 40 laboratory technicians (at least 20 women) have been trained.	Chemical Monitoring Program Designed and 40% of the activities implemented.  Analytical capacity building plan designed and 55 technicians trained.	<b>HS</b>	The percentage of implementation of the activities of the Chemical Monitoring Program was exceeded with the number of laboratory technicians trained within the framework of the Plan for the creation of analytical capacities

Project strategy	Indicators	Baseline	Level in First PIR (self-reported)	Medium term goal	End of project objective	Level and mid-term evaluation	Rating of achievements	Justification of rating
	Indicator 1.3: National and local capacities to comply with regulations and conventions on chemicals and waste were strengthened, as measured by the number of people trained.	National enforcement capacity is limited, and the number of inspectors is very low and, in some provinces, almost absent. Inspectors need MSC training to be able to evaluate technologies used for POPs elimination or elimination	<i>Training plan to improve chemical compliance and develop conventions and regulations. As of June 2022, more than 400 people have been trained (more than 150 women): Total number of people trained: 957, women: 626, men: 323, non-binary: 8.</i>	Training plan to improve compliance with agreements and regulations on chemical products and waste developed and 120 people trained	Training plan to improve compliance with fully applied conventions and regulations on chemical products and waste. 400 people trained (at least 150 women)	957 persons trained on compliance with international conventions and regulations on chemicals (segregated into 626 women, 323 men and 8 non-binary)	<b>HS</b>	The mid-term and end-of-project objectives set by PRODOC have been exceeded.

<b>Component 2: Improved management and elimination of POPs (excluding PCBS), highly toxic chemicals and mercury</b>	Indicator 2. 1: % of implementation of the National Hazardous Chemicals Management Strategy to improve POPs and Hg management	The management of chemicals and waste in Argentina requires improvements in terms of risk management, response to chemical emergencies, management of contaminated sites, etc.	<i>Drafting of the National Hazardous Chemicals Management Strategy. By June 2022, 15% of the Strategy's activities have been implemented.</i>	The National Hazardous Chemicals Management Strategy was drafted and 30% of the strategy's activities implemented.	National Hazardous Chemicals Management Strategy drafted and fully implemented.	The strategy has been developed and 30 per cent progress has been made in its implementation.	<b>S</b>	The mid-term objective has been met.
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Project strategy	Indicators	Baseline	Level in First PIR (self-reported)	Medium term goal	End of project objective	Level and mid-term evaluation	Rating of achievements	Justification of rating
	Indicator 2. 2: Pollutant Release and Transfer Register (PRTR) established	The country does not have a public pollutant emissions/release database or PRTR	<i>15 per cent of the national PRTR system was developed. 15% PRTR pilot project implemented</i>	National PRTR Developed system	Development of the national PRTR system and implementation of 1 PRTR pilot project.	The PRTR strategy is in place. And progress is being made in the planning of the pilot project.	<b>S</b>	Considering that the project has met the established goal, it is important to ensure the implementation of the PRTR as part of the project, to move from the strategy to the generation of the electronic platform required to operationalize the PRTR, as well as the regulatory framework required for mandatory reporting.
	Indicator 2. 3: Number of pilot projects implemented that have resulted in the elimination of mercury MTs and pesticide MTs (COP/HHP).	Number of pilot projects implemented that have resulted in the elimination of mercury MTs and pesticide MTs (COP/HHP).	<i>-Pilot Project I: 205. 48 MT of waste containing mercury was removed from the mine located in the province of San Juan and operated by Minera Andina del Sol.</i> <i>- Pilot Project II: Due to the decision of the operator of the chloral-alkali plant (Unipar Indupa) to extend the operation until 2030, the Project has identified the need to evaluate an alternative for this pilot. The project team will develop a new pilot proposal aligned with the project objective and equivalent global environmental benefits, which will be presented to the Project Board.</i> <i>-Pilot Project III: By June 2022, the Project achieved the elimination of 1. 18 MT of Pesticides (COP/HHP).</i>	150 MT of mercury-containing wastes.  30 MT of pesticides (COP/HHPs).	Four (4) Fully implemented Pilot Projects. 370 MT of waste containing mercury and  100 MT of pesticides (COP/HHP)	Management of 356,078 Metric tonnes of mercury  Elimination of 37. 82 metric tons of POPs and HHP pesticides	<b>HS</b>	The mid-term objectives have been exceeded and the second phase of the project will complete the disposal of even more tons of obsolete pesticides and POPs. However, after reviewing the documentation and conducting the interviews, it is clear that one of the pilot projects will not be able to be carried out. Under adaptive management, the project analyses the replacement of this pilot with other activities.

Project strategy	Indicators	Baseline	Level in First PIR (self-reported)	Medium term goal	End of project objective	Level and mid-term evaluation	Rating of achievements	Justification of rating
			<p><i>-Pilot Project IV: During the period covered by this report, the Project has developed a number of support activities for the implementation of this Pilot, which aims at the Integrated Management and Disposal of Pesticide Packaging in Argentina.</i></p>					

Project strategy	Indicators	Baseline	Level in First PIR (self-reported)	Medium term goal	End of project objective	Level and mid-term evaluation	Rating of achievements	Justification of rating
<b>Component 3: Environmentally sound management and disposal of PCBS</b>	Indicator 3. 1: Improved capacity to assess, monitor and prepare for the phase-out of remaining PCBS in the country, as measured by progress: 1 - Updated inventory 2 - Elimination capacity evaluated 3 - Feasibility study and financial scheme completed 4 - Update of the National Management and Elimination Strategy.	The project should set out measures to ensure that the country can phase out (by 2025) and phase out (by 2028) all remaining quantities of PCBS.	<i>1 - Update of the national inventory of PCBS. 2- Assessment of disposal capacity: Progress was made in the design of the assessment through the elaboration of a proposed content index for the report.</i>	updated national PCBS inventory and  Evaluation of PCBS removal capacity completed.	Feasibility study completed, establishment of financial plan for total phase-out of PCBS and updated/improved national strategy for the management and elimination of PCBS.	Progress has been made in updating the inventory of major public sector owners of PCBS. A database (RENIPP) containing information on public and private owners has been created.	<b>S</b>	Despite significant progress in the process of monitoring and updating the national inventory of PCBs and the generation of the RENIPPS (National Inventory of PCB Stocks) system, it is considered that the second half of the project should focus on incorporating public and private owners who have not yet been registered with RENIPP. The assessment of national capacities has been satisfactorily achieved.
	Indicator 3. 2: Cross-contamination of PCBS is minimized through the development of capacity for maintenance/repair workshops by the Development of a Guideline and implementation of a training plan measured by the number of trained maintenance workshop personnel	The country does not have a quality management system to prevent or minimize the risk of cross-contamination as a result of the use of contaminated oil or a contaminated oil filter.	<i>By June 2022, progress was made on the development of an index of contents for the Guide to Avoid Cross-contamination of PCBS-contaminated equipment and the preparation of a draft document</i>	(1) Guideline for the best Published practices in hazardous waste management	100 STAFF maintenance workshops trained in transformer maintenance and one (1) guide for best practices	According to report IV-2022, a draft Guide to Good Practice and Safe Management of Electrical Equipment Contaminated with PCBs is available.	<b>S</b>	The document has been prepared and is awaiting validation by the MAyDS, however, at the time of this evaluation there is no evidence of its publication.

Project strategy	Indicators	Baseline	Level in First PIR (self-reported)	Medium term goal	End of project objective	Level and mid-term evaluation	Rating of achievements	Justification of rating
	Indicator 3. 3: Number of tons (MT) of PCBS removed from sensitive sites and/or industry	It is estimated that there are still more than 15,000 MT of pure PCBS oils and equipment containing PCBS in the country.	<i>By June 2022, 2876.03 TMs have been eliminated/treated with PCBS within the Project.</i>	2,000 MT of PCBS eliminated.	5,000 MT of PCBS eliminated	2953.3 gross metric tons of PCBs disposed (2958.7 net metric tons)	<b>HS</b>	The mid-term objective has been exceeded by 50%; however, according to interviews by the project team, the end-of-project objective has a high risk of non-compliance, mainly for economic reasons associated with the cost of disposal and replacement of equipment.

Project strategy	Indicators	Baseline	Level in First PIR (self-reported)	Medium term goal	End of project objective	Level and mid-term evaluation	Rating of achievements	Justification of rating
<b>Component 4: Knowledge Management and M&amp;E</b>	Indicator 4. 1: Number of people involved in the Gender Action Plan and Communication Strategy Activities who have been sensitized on the sound management of chemicals.	As part of previous MSC-related projects, awareness was raised on: - 300 persons (180 women + 120 men) Special Programme for Strengthening National Capacities for Chemicals and Waste Management. - 500 people (300 female + 200 male) Initial Evaluation of Minamata. - 700 people (420 female + 280 male) environmentally managed ration of PCBs in Argentina	<i>By June 2022, 2,622 people had participated or had participated in the Gender Action Plan and the Communication Strategy Activities, which had been sensitized on the sound management of chemicals. Specifically, 528 participants in gender-related activities and training</i>	1,500 people (850 women and 650 men) participating in the Gender Action Plan and Communication Strategy activities, sensitized on the sound management of chemicals	4,800 persons (2,600 women and 2,200 men) participants/participants in the Gender Action Plan and Communication Strategy Activities, who have been sensitized on the sound management of chemicals.	4932 persons involved in the Action Plan and the Gender Communication Strategy Activities  2466 Men 2466 Women	<b>HS</b>	The project has managed to exceed both mid-term and end-of-project objectives.  Although the report for the first quarter of 2023 does not include gender segregation, the report for the fourth quarter of 2022 does include gender segregation.
	Indicator 4. 2: Implementation of UNDP/GEF monitoring and evaluation standards and adaptable management processes respond to the monitoring needs of the project and to the findings of the mid-term evaluation.	GEF UNDP M&E requirements were met and adaptive management was not implemented in response to the needs and findings of the Mid-Term Evaluation (MTE).	<i>The Initial Workshop was held virtually due to the restrictions of the COVID-19 pandemic in 2020. The PIR 2021 was the first report of the Project. During the reporting period, the Project met all UNDP project monitoring, quality assurance, risk management and evaluation requirements (The Project presents quarterly financial and progress reports and annual progress reports; a monitoring meeting was held in July 2021 with the participation of</i>	GEF UNDP M&E requirements are met and needs-based adaptive management and mid-term evaluation (MTE) are implemented Results	GEF UNDP M&E requirements are met and adaptive management is applied in response to needs and mid-term evaluation (MTE) Results	It has access to the different reports, audits carried out within the framework of M&E of the project.	<b>HS</b>	Evidence of the preparation of: Quarterly and annual reports sent to UNDP. Audits completed. Project Implementation Reports (PIRs) completed/sent. The mid-term evaluation is under way

Project strategy	Indicators	Baseline	Level in First PIR (self-reported)	Medium term goal	End of project objective	Level and mid-term evaluation	Rating of achievements	Justification of rating
			<i>representatives of the Ministry of Foreign Affairs; The implementation quality control report was submitted in 2021; the level control of 2021 was satisfactory)</i>					

**Code for the Evaluation of Indicators**

<b>Green = Achieved</b>	<b>Yellow = On its way to be achieved</b>	<b>Red = Not likely to be achievement</b>
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#### 4.2.2 Obstacles that remain to achieve project objectives.

As part of the development of this evaluation, the following barriers have been identified:

- 1- Economic: The volatility of the exchange rate of the Argentine peso against the dollar, together with the need to carry out the procurement processes in national currency, makes suppliers reluctant to participate in the processes, given that the price offered in national currency could be significantly affected in the short term. As a result, the contributions will quickly cease to apply against a weaker national currency.  
Given this economic context, the private sector is more cautious about investing in environmental issues, which are not necessarily considered a priority to keep a company running.
- 2- Policies: The start of the project was affected by the internal process of national approval of the project document, this has led to a delay in implementation, making it difficult to reach budget implementation levels. Although the project has implemented adaptive management as part of its efforts to mitigate this backlog, it has not achieved the expected levels. With the implementation of the project, greater ownership and involvement by the implementing partner (MAyDS) has been achieved, which is very positive for the second half of the project. Even if this start-up barrier has been overcome, a change of government could trigger it and create some delays during the period of change of government.
- 3- Regulations: Argentina, as a Federal State, has national and provincial laws, some of these provincial regulations hinder the movement of chemicals and hazardous waste within the country, being a barrier that must be overcome to achieve greater reach of the goals of elimination of POPs, mercury, HHP and pesticide packaging management. The project should promote the establishment of a national guideline, or other policy instrument to expedite permits required for interprovincial transportation<sup>4.3</sup>.

#### 4.3 Project execution and adaptive management

The execution of this project requires a coordination effort with several partners, mainly from the public sector (MAyDS, Foreign Ministry, Ministry of Health, and provincial governments). Some other public sector partners that have been important for the coordination of activities are the National Atomic Energy Commission (CNEA), the National Service of Agrifood Health and Quality (SENASA), the Central Market of Buenos Aires and Trenes Argentinos.

##### 4.3.1 Management mechanisms

The project has established a Project Board (Project Steering Committee) that has met at least once a year, with the objective of accountability on the status of progress of the project and the approval of: i.) Multi-Year Work Plan, ii.) Annual Operating Plans (AOPs), iii.) Budget, iv.) Procurement and Contracts Plan, v.) Monitoring and Evaluation Plan, and vi.) Risk Matrix.

A fundamental part of the good execution of this project and corresponds to what is established in the Prodoc, has been the structure of the MAyDS that provides support to the coordination. This structure is directed by the National Director of the project and Secretary of Environmental Control and Monitoring. This Secretariat has an Undersecretary of Supervision and Recomposition who directly leads the management together with the project coordinator. Within the structure of the MAyDS is the National Director of Hazardous Substances and Waste, which is an entity that has been strengthened with the management of this project.

As indicated in the Prodoc, the Secretariat of Environmental Control and Monitoring has managed to include this in its portfolio of projects, complementing the cooperation between them. This has allowed an efficient use of human and material resources that in turn have strengthened this secretariat for the execution of future chemical

projects that are being managed with GEF 8. This also promotes the institutional sustainability of the achievements obtained by this project in this medium term and in the remainder of the execution period.

The project has formed a team of specialist consultants responsible for each technical area of the components, in which each consultant is responsible for coordinating with the partners involved in achieving the objectives set. The technical areas covered with the participation of the consultants of the work team are: PCBs, obsolete pesticides, project management, monitoring and PRTR, gender and communication and legal aspects.

The gender balance within the project team is very good with an active participation of female and male specialists. The team has been empowered by the gender issue and participates in MAyDS activities contributing with its participation in chemical management issues.

UNDP has been very proactive in proposing management alternatives when the country's economic-political conditions have merited some adaptive management to achieve the objectives of achieving the procurement of goods and services efficiently and effectively. UNDP's role has been one of cooperation and support in the management of coordination and activities. The UNDP Regional Technical Advisor together with the Coordinator have carried out a monthly follow-up of the project in order to keep informed at the regional level of the progress, challenges or obstacles that the project may have and thus take the necessary adaptive management actions in due time.

#### 4.3.2 Work planning

The working method of the annual review of Prodoc is very efficient and allows changing elements of the document to be adjusted. Within these revisions is the Annual Work Plan (POA) and the Annual Budget. These reviews consider the activities carried out and those necessary to ensure compliance with the goals of each component and the mainstreaming of gender issues (Gender Action Plan) in the implementation of the project.

Prodoc's work plans, procurement plans and annual reviews have been carried out systematically and have allowed an evaluation of the year's actions and the necessary improvements to be implemented the following year. This form of review is very useful and allows clarity and systematization of planning.

The fact that this project is under the NIM modality has allowed the MAyDS to have greater influence in the procurement processes for goods and services. The advantage of this way of working is that it creates the internal capacity in the MAyDS that will allow it to continue implementing this modality in future GEF projects.

#### 4.3.3 Financing and co-financing

The project has GEF funding of \$8,930,250 (eight million nine hundred thirty thousand two hundred and fifty U.S. dollars) with co-financing of \$47,675,209 (forty-seven million six hundred and seventy-five thousand two hundred and nine U.S. dollars) for a total budget of \$56,605,459 (fifty-six thousand six hundred and five thousand four hundred and fifty-nine U.S. dollars). The co-financing is divided into USD\$13,434,418 (thirteen million four hundred and thirty-four thousand four hundred and eighteen US dollars) by the Government of Argentina, USD\$34,040,791 (thirty-four million forty thousand seven hundred and ninety-one US dollars) by other partners, mainly from the private sector and a UNDP contribution of USD 200,000 (two hundred thousand US dollars). Table No. 4.2 below provides a breakdown of this co-financing.

Table No. 4.2 shows the co-financing committed, according to the project document, by each of the partners at the time of the preparation of the Prodoc. However, the information received indicates that three additional partners of the Central Government (CNEA, Fabricaciones Militares, YCRT) joined.

**Table No. 4. 2. Distribution of co-financing established in Prodoc**

Co-financing source	Co-financing Type		Total co-financing
	Cash	In kind	
INTI		\$1.000.000	\$1.000.000
ARGENTINE TRAINS	\$1.000.000	\$3.200.000	\$4.200.000
Ministry of Health		\$1.735.000	\$1.735.000
CENTRAL MARKET	\$509.900	\$136.650	\$646.550
SENASA	\$725.000	\$20.500	\$745.500
MAYDS		\$2.366.368	\$2.366.368
Technical Regulations		\$2.741.000	\$2.741.000
<b>Total Central Government</b>			<b>\$13.434.418</b>
TREDI	\$6.559.168		\$6.559.168
Barrick	\$7.225.376		\$7.225.376
Vairo	\$951.544		\$951.544
Pheasant SA.	\$107.443	\$25.333	\$132.776
CABOT Argentina SAIC	\$140.000	\$322.000	\$462.000
PROFERTILE	\$1.470.000	\$5.154.000	\$6.624.000
BASF	\$5.600.000	\$485.100	\$6.085.100
Huntsman Argentina	\$17.220	\$45.500	\$62.720
Martini Recovering	\$1.449.961		\$1.449.961
Stockton	\$262.000		\$262.000
INDUPA	\$4.226.146		\$4.226.146
<b>Total Private Sector</b>			<b>\$34.040.791</b>
UNDP		\$200.000	\$200.000
<b>Total UNDP</b>			<b>\$200.000</b>
<b>Total co-financing</b>			<b>\$47.675.209</b>

Source: Prodoc

Project execution has been low (USD\$2,170,502.05). In the first year, due to the delay in consolidating the document at the national level, the project implemented activities only in the fourth quarter, which justifies the low execution. However, for the year 2021, only 37.36% of what was originally budgeted (multiannual budget) has been executed. For the year 2022, according to the multiannual budget, an execution of 46.56% of the total resources allocated by the GEF should be achieved, however, in the first quarter of 2023 the execution rate is 24.31%. Despite the above, the project has achieved the goals established for mid-term in most of the components with a lower execution than scheduled, this shows good management by the Project Coordination

Unit, the Implementing Partner (MAyDS) and the implementing agency (UNDP). The project, under an adaptive management approach, has made the required budget revisions and adjusted the budgets of the remaining years of implementation, which is expected to execute the entire budget allocated to it. The following table shows the multiannual budget originally established and the adjusted budget (revision C, November 2022), as well as the percentages of implementation achieved on both budgets.

**Table No. 4. 3 Summary of budget implementation from January 2020 to March 2023**

Period	Amount in USD			Percentage of implementation	
	Prodoc budget	Adjusted Budget	Executed annually	From the Prodoc budget	From the adjusted budget (c)
2020	536.750	22.065	22.065,26	4,11%	100,00%
2021	1.792.900	670.999	664.841,30	37,08%	99,08%
2022	1.828.900	1.537.761	1.370.738,45	74,95%	89,14%
2023*	1.836.400	2.663.570	112.857,04	6,15%	4,24%
2024	1.802.400	2.043.302		0,00%	0,00%
2025	1.132.900	1.992.554		0,00%	0,00%
<b>Total</b>	<b>8.930.250</b>	<b>8.930.250</b>	<b>2.170.502,05</b>	<b>24,31%</b>	<b>24,31%</b>
<b>Percentage of Implementation</b>		<b>24,31%</b>			

\*The amount for 2023 corresponds to the amount executed in the first quarter, the closing period of this evaluation.

Source: Prepared by consultant based on the documents and reports submitted by the project team (Prodoc, Annual reports, implementation report, Minutes of Board meeting, Project UNDP-GEF ARG/20G27; November 2022)

As shown in Table No. 4.4, the co-financing reported at the time of this evaluation corresponds to 31.92%, which shows the commitment of all partners to the project. Success in achieving the mid-term objectives can be attributed to the management by the project team of mobilizing the resources committed, both from the public sector, which has mobilized resources of the order of US\$ 5,196,856, and from the private sector, which has invested US\$ 9,919,118, and UNDP has contributed US\$ 40,000, bringing the total amount of co-financing to US\$ 15,155,974. 3 years before closure, it can be perceived that the project will meet the levels of co-financing committed to the GEF, however, it is recommended that the processes of monitoring and accounting for co-financing be improved, allowing for better traceability of co-financing.

**Table No. 4. 4. Co-financing committed vs. co-financing implemented at the EMT.**

Fuente de cofinanciamiento	Nombre de entidad cofinanciante	Tipo de cofinanciamiento	Cantidad cofinanciada a fecha de autorización CEO (US\$)	Cantidad realmente contribuida a fecha del Examen de Mitad de Periodo (US\$)	Porcentaje (%) real de la cantidad prevista
Gobierno Nacional	INTI	En Especie	1.000.000	2.077.800	207,78%
Gobierno Nacional	TRENES ARGENTINOS	En Especie	3.200.000	128.958	4,03%
		Efectivo	1.000.000	343.423	34,34%
Gobierno Nacional	Ministerio de Salud	En Especie	1.735.000	32.435	1,87%
Gobierno Nacional	MERCADO CENTRAL	En Especie	136.650		
		Efectivo	509.900	224.397	44,01%
Gobierno Nacional	SENASA	En Especie	20.500	134.615	656,66%
		Efectivo	725.000	906.512	125,04%
Gobierno Nacional	MAYDS	En Especie	2.366.368	1.183.184	50,00%
Gobierno Nacional	Reglamentos Técnicos	En Especie	2.741.000		
Gobierno Nacional	CNEA	En Especie		98.600	
		Efectivo		33.467	
Gobierno Nacional	Fabricaciones Militares	Efectivo		15.000	
Gobierno Nacional	YCRT	Efectivo		18.465	
<b>Total Gobierno Nacional</b>			<b>13.434.418</b>	<b>5.196.856</b>	
Sector Privado	TREDI	Efectivo	6.559.168	2.564.280	39,09%
Sector Privado	Barrick	Efectivo	7.225.376	2.887.712	39,97%
Sector Privado	VAIRO	Efectivo	951.544		
Sector Privado	Faisan S.A.	En Especie	25.333		
		Efectivo	107.443		
Sector Privado	CABOT Argentina SAIC	En Especie	322.000		
		Efectivo	140.000		
Sector Privado	PROFERTIL	En Especie	5.154.000		
		Efectivo	1.470.000		
Sector Privado	BASF	En Especie	485.100		
		Efectivo	5.600.000		
Sector Privado	Huntsman Argentina	En Especie	45.500		
		Efectivo	17.220		
Sector Privado	Martini Recovering	Efectivo	1.449.961		
Sector Privado	Stockton	Efectivo	262.000	659.573	251,75%
Sector Privado	INDUPA	Efectivo	4.226.146	3.807.554	90,10%
<b>Total sector privado</b>			<b>34.040.791</b>	<b>9.919.118</b>	
PNUD		En Especie	200.000	40.000	
<b>Total PNUD</b>				<b>40.000</b>	
<b>Total GENERAL</b>			<b>47.475.209</b>	<b>15.155.974</b>	<b>31,92%</b>

Source: Prepared by consultant based on the documents and reports submitted by the project team

#### 4.3.4 Project-level monitoring and evaluation systems

The Monitoring and Evaluation Plan included in Prodoc has a budget that meets compliance expectations. During the execution of this first half of the project, the following monitoring and follow-up instruments have been adequately implemented: the PIR, quarterly and annual reports, minutes of Board of Directors' meetings, audits and spot checks, field visits by the UNDP Regional Technical Advisory Office and its corresponding report, Prodoc Annual Reviews. Additionally, it has monitored environmental and social risks, followed up on compliance with the Gender Action Plan.

The application of all these instruments has allowed the progress of the project and the achievement of its goals to be very good and to congratulate the coordination team.

Board meetings review the performance achieved for that year and make adjustments for the following year in accordance with the proposed work plan and procurement plan. At both meetings the issue of budget execution was reviewed and the necessary adjustments were approved.

It is important to indicate that, although during the year 2020 and 2021, due to the delay in the approval at the national level of the project and the effects of the Covid-19 Pandemic, the execution was not at the desired level, however, quickly in the second half of 2021 the recovery was achieved at a level higher than 80% of the budget established for that period. This is the result of an adequate adaptive management to promote budget execution in favor of the achievement of the established goals.

#### 4.3.5 Stakeholder involvement

Regarding the management of the project, the coordination has established significant alliances with the main actors, such as: MAyDS, Foreign Ministry, Ministry of Health of the Nation, National University of La Plata, CONICET, National Atomic Energy Commission (CNEA), SENASA, Central Market of Buenos Aires, Trenes Argentinos, INTI, Matanza Riachuelo Basin Authority (ACUMAR), and the Secretariat of Environment and Climate Change - Province of Río Negro.

The MAyDS, in its role as Executing Agency/Implementing Partner, is committed from the highest level to the objective of the project and to the expected results. The Secretariat for Environmental Control and Monitoring, through the Undersecretariat for Oversight and Recomposition, plays an active role in monitoring the project. The National Directorate of Hazardous Substances and Waste also has a support and monitoring role for the management of the project.

The management of this project has been a catalyst for the strengthening of the aforementioned entities and has created institutional capacities in line with GEF's lines of action.

Regarding the mainstreaming of the gender perspective in the project, activities have been carried out with the partners to promote and train women and men in the management of chemical substances and the risks that these substances represent for vulnerable populations.

#### 4.3.6 Social and Environmental Standards (Safeguards)

The risks identified in the most recent SESP are reviewed annually when the Prodoc review is made. Especially in revision B and C of Prodoc an update of the risks is made, pointing out in particular three major risks that deserve to be noted in this evaluation:

1. The change of government and the possible new appointments of the managerial and technical staff in the entities that are partners of the project. This risk is real, but as technical positions are not normally changed it is considered to be moderate.
2. The continued rise in inflation and the impact this may have on the private sector. Private sector PCB holders are adversely affected in their purchasing power as a result of inflation, which results in a smaller available budget and the consequent decrease in the amount of PCBs that are eliminated by this sector.
3. The interrelationship of changes at the political level and the economic environment would make it difficult for the project to realize the planned activities and achieve the results associated with the private sector. The most direct consequence would be the slowdown in the dynamics of project implementation and the commitments associated with co-financing from this sector.

Risks are reviewed and good risk management is maintained throughout the implementation of the project.

#### 4.3.7 Reports

The coordination of the project presents a report at the annual meeting of the Board of Directors and in this indicates the adaptive management that is necessary to carry out for approval. In the minutes of the meetings of



the Board of Directors of December 6, 2021 and January 13, 2023, management adaptation needs are identified. Among some adaptive management actions that have been necessary to implement and that have been approved by the Board of Directors, we can highlight the following:

1. There is a monopoly market for the export of PCBs and DDT and there is also a shortage of opportunities for maritime transport of hazardous wastes. As an adaptive measure of this risk, the project coordination proposed as an alternative to manage these acquisitions under the modality of direct contracting. This new modality allows a reduction of approximately 90 days in the management of contracting, and thus gains flexibility in the face of unforeseen events that may occur particularly in these times of economic instability in the country.
2. Faced with analytical capacities unequally distributed in different laboratories of the national system and considering that there are restrictions for the contracting of these capacities, the coordination proposes the use of letters of agreement to achieve these services.
3. Given the existence of difficulties for interjurisdictional movements of hazardous waste stockpiles, the coordination of the project to mitigate this situation proposes to evaluate the design of management strategies for these stockpiles.

The project team is very diligent in presenting the monitoring and control reports established by the GEF such as the PIR and the Quarterly and Annual Reports. In all cases, satisfactory ratings have been obtained and no corrective actions have been required. These reports demonstrate how efficient and effective the management of this project has been until the completion of this evaluation.

#### 4.3.8 Communication and Knowledge Management

The internal communication of the project with the interested parties mainly the MAyDS, the Ministry of Health, the Foreign Ministry, SENASA and CNEA among others is fluid and constant.

In the Undersecretariat of Supervision and Recomposition, a constant review of compliance with the POA is carried out with the coordinator and the project team.

The project has managed to fulfill the development of a National Communication Strategy through the implementation of the National Strategy for the Management of Hazardous Chemicals, the Gender Action Plan, the implementation of the Training Program for Enhanced Compliance, including an Analytical Capacity Building Plan and a Chemicals Monitoring Program with analytical capacity building.

The project has published through the page (<https://www.argentina.gob.ar/ambiente/control/sustancias>) the different topics it has developed, this allows to keep the information accessible to the public. Also, on the YouTube channel of the project there are videos on topics such as:

1. Management of hazardous chemicals
2. Chemicals
3. Elements of nature
4. Bioaccumulation

In the PIR 2022, in the section Progress in the Promotion of Gender Equality and the Empowerment of Women, the reports on activities carried out in the area of gender equality are detailed for public viewing.

The project has contributed to the following sustainable development goals: SDG 3, goal 3.9; SDG 5, goal 5.c; SDG 12, goal 4, with the reduction of POPs inventories (PCB contaminated equipment and oils, DDT) and the final disposal of approximately 356 tons of liquid mercury from a gold mine. These important positive results will

prevent these substances, if not properly managed, from contaminating the air, soil and water sources; enabling a better and safer life for future generations. All this is aligned with the project's objective of minimizing the risk posed by POPs, mercury and other chemicals to human health and the environment.

With regard to overall environmental benefits, the results obtained up to this MTR, the project has avoided exposure of people and the environment to hazardous chemicals and wastes, specifically persistent organic pollutants and mercury.

Some of the global environmental benefits obtained by these results are:

1. Protection of human health and the environment by reducing the use and disposal of mercury.
2. Protection of human health and the environment by reducing and eliminating the use and production of persistent organic pollutants and their residues.
3. Reducing the risk to human health and the environment through the sound management of chemicals.

#### 4.4 Sustainability

In general terms, the risk matrix presented in the project document and in the annual revisions to this document are kept up to date at the time of this evaluation.

The project has evolved very well in the fulfillment of the goals and its implementation in general, but there are two important risks to highlight and that must be reassessed in this year 2023, especially considering the upcoming presidential elections and the changes in the economic context that the country is experiencing. These two risks are illustrated in the table below.

**Table No.4.5 Significant risks to EMT.**

<p><b>Risk 2.</b> The change of governance could lead to new appointments of managerial and technical staff in project partners, which would require additional efforts to ensure acceptance of project support and, in turn, could slow down the speed of project implementation at the outset.</p>	<p>It is a political risk with an impact assessment = <b>4</b> and probability = 4</p> <p>The mitigation measure proposed in the risk table is that the technical staff of MAYDS, the technical teams of DIGMA and DPROY of MRECIC, the staff of the UNDP country office and the Regional Technical Advisor (RTA) of UNDP in Panama will do their best to inform and convince new decision makers about the importance of the project, the reasons why it was developed and the positive impact it will have on human health and the environment in Argentina.</p>
<p><b>Risk 3:</b> Inflation continues to rise, harming the purchasing power of PCB owners, resulting in the elimination of fewer tons of PCBs by owners than originally planned, which undermines the achievement of project objectives.</p>	<p>It is an economic risk with an impact assessment = <b>3</b> and probability = 3.</p> <p>The measure of mitigation of this risk is that, during the development of the project, the co-financing promised by the private sector and, in particular, by the holders of PCBs was significant. Based on the co-financing commitments obtained and the PCB phase-out objectives that could be achieved with this co-financing, the project moved the surplus budget allocations from Comp. 3 to Comp. 2. However, if the economic situation in Argentina greatly affects the achievement of the project's PCB objectives, the project is likely to reallocate funding from Comp. 2 to Comp. 3 to ensure</p>



	compliance with the project's PCB objectives.
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In the opinion of this evaluator, the risks previously illustrated to achieve the sustainability of the project are important, but they are not high enough to jeopardize the implementation of this, possibly representing some delays, but the progress made so far of this evaluation is significant and demonstrate that project management allows to resolve risks effectively.

#### 4.4.1 Financial risks for sustainability

By analyzing the expected results of the project, it is possible to determine the financial risks to the sustainability of the project once the project intervention with cooperation resources is completed.

Although it is a fact that the own resources of the most important public institutions involved in this project, MAyDS and the Ministry of Health, under the current economic conditions of Argentina, are expected to increase once the cooperation is concluded, it is not something that determines the unsustainability of the achievements obtained. At the time of this assessment, the country is in the process of applying for a new project to GEF 8 that will be for the integrated management of chemicals, as well as the reduction of POPs, other pesticides and highly hazardous chemicals.

The structure of the Secretariat for Control and Monitoring and the Under-Secretariat for Control and Reconstruction, strengthened by this project, will be further strengthened by the activities expected to be carried out under this proposed new initiative.

The project team and the Project Board should take steps to build the necessary conditions in this second phase of the project to ensure sustainability after the completion of the project intervention.

#### 4.4.2 Socio-economic risks to sustainability

The economic context that Argentina faces is an important risk to take into account for the sustainability of the project, the volatility of the exchange rate can lead to the investment associated with the environmentally sound management of chemical substances not being a priority for the owners, both public and private, leaving these environmental investments out of planning, when facing other expenses that they consider more important to maintain the operation of their institutions or companies.

However, it is important to indicate that the issue of the rational management of POPs, Mercury and other dangerous chemicals is not questionable by any of the actors. For the MAyDS, it is a line of work that deserves its attention and has received the support of the ministry throughout its implementation.

In the interviews carried out with the different beneficiaries of the elimination of PCBs, DDT and other pesticides, it was evident that the project has their full support and they are very grateful to be part of this effort. An important link with the project team was also perceived, turning the MAyDS into a reference for other types of support, such as information to carry out training using part of the work carried out as a reference. This is a way to strengthen the actions of the MAyDS with the different State institutions related to the environment and safety of dangerous chemicals (POPs, HHPs, Hg, among others).

#### 4.4.3 Sustainability risks related to the institutional framework and governance.

Argentina will hold presidential elections this year 2023 and there may be changes in the structures of ministries, including the MAyDS and officials in key positions, even changes could happen at the level of Secretaries and Undersecretaries of departments of institutions that are key partners in this project.

This risk was analyzed in several of the interviews conducted and the consensus is that, although there is a real possibility that the managers as Secretaries and Undersecretaries of the institutions change, the technical levels rarely change. The positions of trust are the ones that are usually changed, but in some cases this is not the case either.

What is important here is that projects of this nature with international cooperation funds are usually not subject to change because they are initiatives that have been approved and contribute to the strengthening of the country's environmental management. It does not involve new investment beyond the co-financing which has already been committed from the outset and which is usually in kind. The project strengthens the public institutions that are part of it.

#### 4.4.4 Environmental risks to sustainability

The most important environmental risks of this project arise during the preparation phase of shipments for export of hazardous wastes such as equipment and oils contaminated with PCBS, obsolete pesticides and mercury. The process of packaging and land transport from the collection site to the maritime terminal and then to the country of final destination represents risks, but these are mitigated by the security measures taken by the companies, in this case the company Tredi, throughout their management of export preparation.

In order to minimize the risk indicated, not only is the intervention of the project team necessary, but the Secretariat for Environmental Control and Monitoring and the Undersecretariat for Control and Recomposition must actively participate in the monitoring and control processes to ensure that the risk is properly controlled.

In the second phase of the project, the Coordinator has indicated that on-site dechlorination treatment of transformers with PCBs is planned. For this type of processing management, it is important to thoroughly review the security protocols that the providers of this service offer and ensure a monitoring and control of these activities during their execution.

**The overall assessment of sustainability is Probable (P).**

## 5 Conclusions and recommendations

### 5.1.1 Conclusions

The main conclusion of this evaluation is that the project has contributed significantly to the strengthening of MAyDS, as well as to its work on the management of chemicals and hazardous wastes and the consequent fulfilment of Argentina's international commitments under the Stockholm and Minamata Conventions. This strengthening achieved by the project is one of the main results expected by the GEF.

After the documentary review and interviews with key actors, as well as analyzing the context in which this project is implemented, it is concluded that:

1. The project was well formulated, meets the national needs for the fulfillment of the commitments made within the framework of international conventions (POPs and Mercury) and at the same time allows the continuity of activities developed in previously executed projects, such as the UNDP project #3744 "Environmentally sound management and elimination of PCBs in Argentina". The success of the project in meeting most of the goals set for this period is due to a very well executed coordination with the accompaniment of a technical team according to the needs.
2. The active participation of MAyDS as executing agency/partner in implementation has been fundamental to the achievement of the results obtained. The commitment shown by MAyDS and other institutions of the Argentine State has enabled significant progress to be made in meeting the established goals.
3. The public institutions have internalized the project, taking it as their own and showing a level of commitment and interest in it that facilitates the implementation of the established activities and promotes the achievement of the established objectives.
4. Argentina 's current economic and political context made it more difficult to procure goods and services, but coordination had acted under an adaptive management approach that had enabled it to make significant progress and aimed at increasing the percentage of the budget implemented in the second half of the project. Despite the difficulties encountered, the project has managed to eliminate significant quantities of obsolete PCBs and pesticides such as DDT from public institutions. As well as the contribution of the private sector to the elimination of mercury, which was a private initiative that forms part of the co-financing for the achievement of the objectives set within the framework of this project.
5. UNDP has supported the project team to achieve adaptive management in the face of multiple delays in the procurement processes resulting from the economic reality of Argentina and the obtaining of export permits in compliance with the Basel Convention.
6. UNDP is committed to MAyDS and has provided support on several occasions by training government staff in UNDP/GEF processes to ensure the success of the project. This effort is important and very positive.
7. The design and implementation of a gender and communication action plan has been a challenge, but it has been possible to incorporate the elements of inclusion not only into training activities, but also to incorporate this approach across the various activities associated with chemicals management, including vulnerable populations such as the transgender population.
8. Despite the delays that the project has faced in the first year of implementation, with the local approval process of Prodoc, and the entry of the Covid-19 pandemic, the project has adjusted its management, achieving significant progress, even beyond the objectives set for the mid-term.
9. Successful achievement of mid-term objectives can be attributed to the project team's management of mobilizing committed resources, both from the public and private sectors. In the absence of three years

before closure, it is clear that the project will meet the co-financing levels committed to the GEF; however, it is recommended that the processes of monitoring and accounting for co-financing be improved, allowing for better traceability.

### 5.1.2 Recommendations

The project has made significant progress on all the indicators and objectives set for the medium term, even though it has faced delays in the start-up, the restriction and isolation measures established to minimize the effects of the Covid-19 pandemic. However, with the aim of achieving the expected impacts and ensuring sustainability once the project intervention is completed, the following recommendations are presented:

No.	Recommendation	Responsible
1	<p><b>Safeguards for transition of government</b></p> <p>A presidential election process will be held this year, so the project needs to establish a communication strategy for the incoming authorities, which will make it possible to visualize the benefits of the project at the local, national and global levels. UNDP support is important in this process. This strategy should be geared towards ensuring the continuity of the activities set out in PRODOC.</p>	<p>MAYDS UNDP Project Team</p>
2	<p><b>Ensure the sustainability of the project.</b></p> <p>Establish a clear sustainability strategy to strengthen the institutional capacities of project partners. As well as continuity by the private sector in the environmentally sound management of hazardous chemicals and their wastes, which form part of its operations.</p>	<p>UNDP Project Team</p>
3	<p><b>Strengthening and intensifying work with the private sector</b></p> <p>Although the mid-term objectives have been achieved, it is important to intensify work with the private owners of PCBS, highly hazardous pesticides, pesticide packaging and mercury, which have not been incorporated to date, so to achieve the objectives set at the end of the project it is necessary to incorporate them into the process through a strategy.</p>	<p>Project Team</p>
4	<p><b>Expand the scope of the national PCBS inventory.</b></p> <p>As of the date of this evaluation, the PCBS inventory includes mostly the public sector and a small part of the private sector, focused on large holders. It is recommended for the second half of the project to broaden the scope of this inventory to include small private and public sector owners that have not been included up to the moment of this evaluation.</p>	<p>Project Team</p>
5	<p><b>Establish a training plan for maintenance workshops of equipment with PCBS.</b></p> <p>The project has a Guideline for Best Practices in Hazardous Waste Management published; however, it is recommended that a training plan be established to achieve the established goal, with the aim of minimizing cross-contamination of equipment during the maintenance process of such equipment.</p>	<p>Project Team</p>
6	<p><b>Diversify treatment/decontamination alternatives for PCBS equipment.</b></p> <p>Currently, the project has focused efforts on the export of inventories contaminated with PCBS, this evaluator recommends expanding treatment options by analyzing on-site dechlorination technologies for concentrations that allow it, as a more economical and easy-to-implement alternative. This option would reduce the time required to obtain international transit permits under the Basel Convention and increase the volume of equipment and oils treated.</p>	<p>Project Team</p>



## 6 Anexos

### 6.1 Anexo en archivo separado: Términos de referencia del MTR



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#### TERMS OF REFERENCE

<b>Services/Work Description:</b>	International Consultant for Mid-Term Review (MTR)
<b>Project:</b>	ARG20G27, Environmentally Sound Management of POPs, Mercury and other Hazardous Chemicals in Argentina (PIMS 6281)
<b>Duty Station:</b>	Buenos Aires, Argentina
<b>Type of contract:</b>	International Personal Services Agreement
<b>Starting Date:</b>	April 3, 2023
<b>Duration of Assignment:</b>	Thirty-five (35) days in twelve (12) weeks
<b>Language(s) Required:</b>	Spanish and English

#### 1. INTRODUCTION

This is the Terms of Reference (ToR) for -the Midterm Review (MTR) of the full-sized UNDP-supported GEF-financed project titled Environmentally Sound Management of POPs, Mercury and other Hazardous Chemicals in Argentina (PIMS #6281) implemented through the Secretariat of Control and Environmental Monitoring, which is to be undertaken in 2023. The project started on September 2020 and is in its 3<sup>rd</sup> year of implementation. This ToR sets out the expectations for this MTR. The MTR process must follow the guidance outlined in the document *Guidance for Conducting Midterm Reviews of UNDP-Supported, GEF-Financed Projects*. (Link: [TS \(undp.org\)](https://www.undp.org)).

#### 2. PROJECT BACKGROUND INFORMATION

The Global Environmental Facility (GEF) Council approved full-sized project titled “Environmentally Sound Management of POPs, Mercury and other Hazardous Chemicals in Argentina” (PIMS #6281), which commenced in September 2020, is implemented through the Government of Argentina with the support of the United Nations Development Programme Argentina Country Office (National Implementation Modality). The grand total project financing is USD 55,555,759, which includes USD 8,930,250 in GEF grant funding and USD 46,625,509 in co-financing. The total co-financing from the Government of Argentina is USD 13,523,086, whilst the commitment from the private sector is USD 32,902,423. UNDP committed USD \$200,000 in co-financing to the project.

The project aims to minimize the risk posed by Persistent Organic Pollutants (POPs), mercury and other hazardous chemicals to human health and the environment by improving their sound life-cycle

## 6.2 Matriz de evaluación del MTR

**Cuadro No. 2.3 Plantilla para la matriz de evaluación del MTR.**

Criterios de evaluación – Preguntas	Indicadores	Fuentes	Metodología
Estrategia de proyecto: ¿Hasta qué punto es relevante la estrategia del proyecto para las prioridades nacionales y la propiedad e implicación del país? ¿Es el mejor camino para obtener los resultados?			
- ¿Cómo apoya el proyecto las prioridades estratégicas del PNUD y el FMAM?	- Existencia de una clara relación entre los objetivos del proyecto y prioridades estratégicas del PNUD y el FMAM.	- Documentos del proyecto - Estrategias y documentos del PNUD y el FMAM.	- Análisis de documentos. - Entrevistas con personal del PNUD y del equipo del proyecto.
- ¿Cómo apoya el proyecto las prioridades ambientales y de desarrollo a nivel nacional? - ¿Cuál ha sido el nivel de participación de los interesados en el diseño del proyecto? - ¿El proyecto toma en consideración las realidades nacionales, políticas y nacionales tanto en su diseño como en su implementación? - ¿Cuál ha sido el nivel de apropiación de los principales actores interesados en la implementación del proyecto?	- Grado en el que el proyecto apoya las políticas ambientales nacionales. - Valoración de los interesados clave con respecto al nivel de adecuación del diseño e implementación del proyecto a las realidades nacionales y capacidades existentes. - Coherencia entre las necesidades expresadas por los interesados nacionales y criterio del PNUD-FMAM. - Nivel de involucramiento de funcionarios del gobierno y otros socios en el proceso de diseño del proyecto.	- Documentos del proyecto - Valoración de socios e interesados clave del proyecto.	- Análisis de documentos. - Entrevistas con personal del Ministerio de Ambiente y Desarrollo Sostenible (MAyDS), socios del proyecto, PNUD y del equipo del proyecto.
- ¿Existen vínculos lógicos entre los resultados esperados del proyecto y el diseño del proyecto (en términos de componentes del proyecto, elección de socios, estructura, mecanismos de implementación, alcance, presupuesto, uso de recursos, entre otros)? - ¿De qué manera la teoría del cambio expresada en el PRODOC guarda correspondencia con la estructura y composición del proyecto, el contexto y las necesidades del país?	- Nivel de coherencia entre los resultados y el diseño de la lógica interna del proyecto. - Nivel de coherencia entre el diseño del proyecto y su enfoque de implementación. - Nivel de correspondencia de la teoría de cambio, con la estructura y composición del proyecto, el contexto y las necesidades del país?	- Documentos del proyecto. - Valoración del personal de MAyDS y los socios del proyecto y el equipo del proyecto.	- Análisis de documentos. - Entrevistas con personal del Ministerio de Ambiente y Desarrollo Sostenible (MAyDS), socios del proyecto, PNUD y del equipo del proyecto.
Progreso en el logro de resultados: ¿Cuál es el grado de cumplimiento de los resultados y objetivos deseados hasta el momento?			
- ¿Ha sido el proyecto efectivo en alcanzar los resultados esperados hasta el momento?	- Análisis de los indicadores en el marco de los resultados estratégicos/marco lógico del	- Documentos del proyecto.	- Análisis de documentos. - Entrevistas con personal del Ministerio de Ambiente y



	proyecto, con relación a los recursos.	<ul style="list-style-type: none"> <li>- Reportes de avance trimestral y anual.</li> <li>- Personal de MAyDS, los socios, el equipo del proyecto y PNUD.</li> </ul>	Desarrollo Sostenible (MAyDS), socios del proyecto, PNUD y del equipo del proyecto.
<ul style="list-style-type: none"> <li>- ¿Cómo se manejaron los riesgos y supuestos del proyecto?</li> <li>- ¿Cuál ha sido la calidad de las estrategias de mitigación desarrolladas?</li> <li>- ¿De qué manera la gestión adaptativa ha contribuido con el logro de los resultados y la ampliación de los productos esperados?</li> </ul>	<ul style="list-style-type: none"> <li>- Integridad de la identificación de riesgos y supuestos durante la planeación y el diseño del proyecto.</li> <li>- Calidad de los sistemas de información establecidos para identificar riesgos emergentes.</li> </ul>	<ul style="list-style-type: none"> <li>- Documentos del proyecto.</li> <li>- Reportes de avance trimestral y anual.</li> <li>- Personal de MAyDS, los socios, el equipo del proyecto y PNUD.</li> </ul>	<ul style="list-style-type: none"> <li>- Análisis de documentos.</li> <li>- Entrevistas con personal del Ministerio de Ambiente y Desarrollo Sostenible (MAyDS), socios del proyecto, PNUD y del equipo del proyecto.</li> </ul>
<p>Ejecución del proyecto y gestión adaptativa: ¿Hasta el momento se ha implementado el proyecto de manera eficiente, rentable y adaptada a las condiciones cambiantes? ¿Hasta qué punto contribuyen los sistemas de seguimiento y evaluación, información y comunicación del proyecto a su ejecución?</p>			
<ul style="list-style-type: none"> <li>- ¿De qué manera la gestión adaptativa ha contribuido con el logro de los resultados y la ampliación de los productos esperados?</li> <li>- ¿Se han utilizado como herramientas de gestión durante la implementación del proyecto, el marco lógico, los planes de trabajo o cualquier cambio realizado a estos?</li> <li>- ¿Han sido los sistemas financieros y contables adecuados para la gestión del proyecto y para producir información financiera precisa y a tiempo?</li> <li>- ¿Fueron los reportes de progreso precisos y puntuales? ¿Responden a los requerimientos de reporte? ¿Incluyen los cambios por manejo adaptativo?</li> <li>- ¿Ha sido la ejecución del proyecto tan efectiva como fue propuesta originalmente (planeado vs. actual)?</li> <li>- ¿El cofinanciamiento ha sido de acorde a lo planeado?</li> <li>- ¿Los recursos financieros han sido usados eficientemente?</li> </ul>	<ul style="list-style-type: none"> <li>- Se necesitó el manejo adaptativo para asegurar un uso eficiente de los recursos.</li> <li>- Disponibilidad y calidad de los reportes financieros y de progreso.</li> <li>- Puntualidad y adecuación de los reportes entregados.</li> <li>- Nivel de discrepancia entre el gasto planeado y el realmente ejecutado.</li> <li>- Cofinanciamiento planeado vs. el actual recibido.</li> <li>- Cuán adecuadas han sido las opciones seleccionadas por el proyecto en función del contexto, la infraestructura y el costo.</li> <li>- Calidad del reporte de gestión basado en resultados (reportes de progreso, monitoreo y evaluación).</li> <li>- Existieron y con qué ocurrencia cambios en el diseño del proyecto o en el enfoque de implementación cuando han sido necesarios para mejorar la eficiencia del proyecto.</li> <li>- Costo asociado al mecanismo de entrega y</li> </ul>	<ul style="list-style-type: none"> <li>- Documentos del proyecto.</li> <li>- Reportes de avance trimestral y anual.</li> <li>- Personal de MAyDS, los socios, el equipo del proyecto y PNUD.</li> </ul>	<ul style="list-style-type: none"> <li>- Análisis de documentos.</li> <li>- Entrevistas con personal del Ministerio de Ambiente y Desarrollo Sostenible (MAyDS), socios del proyecto, PNUD y del equipo del proyecto.</li> </ul>

<ul style="list-style-type: none"> <li>- ¿Han sido las adquisiciones realizadas de manera que se haga un uso eficiente de los recursos del proyecto?</li> <li>- ¿Cómo ha sido usado el enfoque de gestión basada en resultados durante la implementación del proyecto?</li> </ul>	<p>estructura de gestión, en comparación con otras alternativas.</p>		
<p>Sostenibilidad: ¿Hasta qué punto existen riesgos financieros, institucionales, socioeconómicos y/o medioambientales para la sostenibilidad a largo plazo de los resultados del proyecto?</p>			
<ul style="list-style-type: none"> <li>- ¿Han sido integrados aspectos de sostenibilidad en el diseño e implementación del proyecto?</li> </ul>	<ul style="list-style-type: none"> <li>- Evidencia/calidad de la estrategia de sostenibilidad.</li> <li>- Evidencia/calidad de las acciones llevadas a cabo para asegurar la sostenibilidad.</li> </ul>	<ul style="list-style-type: none"> <li>- Documentos del proyecto.</li> <li>- Valoración del personal de MAyDS, los socios del proyecto y el equipo del proyecto.</li> </ul>	<ul style="list-style-type: none"> <li>- Análisis de documentos.</li> <li>- Entrevistas con personal del Ministerio de Ambiente y Desarrollo Sostenible (MAyDS), socios del proyecto, PNUD y del equipo del proyecto.</li> </ul>
<ul style="list-style-type: none"> <li>- ¿El proyecto aborda adecuadamente los aspectos de sostenibilidad financiera y económica?</li> </ul>	<ul style="list-style-type: none"> <li>- Nivel y fuente de soporte financiero a ser provisto en el futuro a sectores y actividades relevantes después del término del proyecto.</li> <li>- Evidencia de compromiso de socios internacionales, gobiernos y otros interesados para apoyar financieramente sectores/actividades relevantes luego de la finalización del proyecto.</li> </ul>	<ul style="list-style-type: none"> <li>- Documentos del proyecto.</li> <li>- Valoración del personal de MAyDS, los socios del proyecto y el equipo del proyecto.</li> </ul>	<ul style="list-style-type: none"> <li>- Análisis de documentos.</li> <li>- Entrevistas con personal del Ministerio de Ambiente y Desarrollo Sostenible (MAyDS), socios del proyecto, PNUD y del equipo del proyecto.</li> </ul>
<ul style="list-style-type: none"> <li>- ¿Existe evidencia de que los socios del proyecto darán continuidad a las actividades más allá de la finalización del proyecto?</li> <li>- ¿Cuál es el grado de compromiso político para continuar trabajando sobre los resultados del proyecto?</li> </ul>	<ul style="list-style-type: none"> <li>- Grado en que las actividades del proyecto y los resultados han sido asumidas por las contrapartes.</li> <li>- Nivel de soporte financiero a ser provisto por el gobierno, una vez que termine el proyecto.</li> </ul>	<ul style="list-style-type: none"> <li>- Documentos del proyecto.</li> <li>- Valoración del personal de MAyDS, los socios del proyecto y el equipo del proyecto.</li> </ul>	<ul style="list-style-type: none"> <li>- Análisis de documentos.</li> <li>- Entrevistas con personal del Ministerio de Ambiente y Desarrollo Sostenible (MAyDS), socios del proyecto, PNUD y del equipo del proyecto.</li> </ul>
<ul style="list-style-type: none"> <li>- ¿Cuáles son los principales desafíos que pueden dificultar la sostenibilidad de los esfuerzos?</li> </ul>	<ul style="list-style-type: none"> <li>- Cambios que podrían significar desafíos al proyecto.</li> </ul>	<ul style="list-style-type: none"> <li>- Documentos del proyecto.</li> <li>- Valoración del personal de MAyDS, los socios del proyecto y el equipo del proyecto.</li> </ul>	<ul style="list-style-type: none"> <li>- Análisis de documentos.</li> <li>- Entrevistas con personal del Ministerio de Ambiente y Desarrollo Sostenible (MAyDS), socios del proyecto, PNUD y del equipo del proyecto.</li> </ul>

### 6.3 Escalas de valoración

<b>Calificaciones para el progreso hacia los resultados: (una calificación para cada resultado y para el objetivo)</b>		
6	Altamente satisfactorio (AS)	Se espera que el objetivo/resultado alcance o supere todos sus objetivos de fin de proyecto, sin grandes deficiencias. El progreso hacia el objetivo/resultado puede presentarse como "buena práctica".
5	satisfactorio (S)	Se espera que el objetivo/resultado alcance la mayoría de sus metas de fin de proyecto, con solo deficiencias menores.
4	Moderadamente satisfactorio (MS)	Se espera que el objetivo/resultado alcance la mayoría de sus metas de fin de proyecto, pero con deficiencias significativas.
3	Moderadamente insatisfactorio (MI)	Se espera que el objetivo/resultado alcance sus metas de fin de proyecto con importantes deficiencias.
2	Insatisfactorio (I)	Se espera que el objetivo/resultado no alcance la mayoría de sus metas de fin de proyecto.
1	Altamente insatisfactorio (AI)	El objetivo/resultado no ha logrado alcanzar sus objetivos de mitad de período y no se espera que alcance ninguno de sus objetivos de fin de proyecto.

<b>Calificaciones para la implementación del proyecto y la gestión adaptativa: (una calificación general)</b>		
6	Altamente satisfactorio (AS)	La implementación de los siete componentes principales (arreglos de gestión, planificación del trabajo, finanzas y cofinanciamiento, sistemas de monitoreo y evaluación a nivel de proyecto, participación de las partes interesadas, informes y comunicaciones) está conduciendo a una implementación eficiente y efectiva del proyecto y a una gestión adaptativa. El proyecto puede presentarse como "buena práctica".
5	Satisfactorio (S)	La aplicación de la mayoría de los siete componentes está conduciendo a una ejecución eficiente y eficaz de los proyectos y a una gestión adaptable, excepto en el caso de unos pocos que están sujetos a medidas correctivas.
4	Moderadamente satisfactorio (MS)	La aplicación de algunos de los siete componentes está dando lugar a una ejecución eficiente y eficaz de los proyectos y a una gestión adaptable, y algunos componentes requieren medidas correctivas.
3	Moderadamente insatisfactorio (MI)	La implementación de algunos de los siete componentes no está conduciendo a una implementación eficiente y efectiva del proyecto y adaptativa, y la mayoría de los componentes requieren medidas correctivas
2	Insatisfactorio (I)	La implementación de la mayoría de los siete componentes no está conduciendo a una implementación eficiente y efectiva del proyecto y a una gestión adaptativa.
1	Altamente insatisfactorio (AI)	La implementación de ninguno de los siete componentes está conduciendo a un proyecto eficiente y efectivo Implementación y gestión adaptativa.

<b>Calificaciones de sostenibilidad: (una calificación general)</b>		
4	Probable (P)	Riesgos insignificantes para la sostenibilidad, con resultados clave en camino de lograrse mediante el cierre del proyecto y que se espera que continúen en el futuro previsible
3	Moderadamente probable (MP)	Riesgos moderados, pero expectativas de que al menos algunos resultados se mantendrán debido al progreso hacia los resultados en la revisión intermedia
2	Moderadamente improbable (MI)	Riesgo significativo de que los resultados clave no continúen después del cierre del proyecto, aunque algunos productos y actividades deben continuar
1	Improbable (I)	Graves riesgos de que los resultados del proyecto, así como los productos clave, no se mantengan

## 6.4 Lista de personas entrevistadas

No.	Nombre	Institución	Cargo	Correo electrónico	Modalidad
1	Jorge Etcharrán	MAyDS	Subsecretario de fiscalización y recomposición	<a href="mailto:jetcharran@ambiente.gov.ar">jetcharran@ambiente.gov.ar</a>	Presencial
2	Martín Illescas	MAyDS	Director general de proyectos con financiamiento externo y cooperación internacional – punto focal del GEF	<a href="mailto:millescas@ambiente.gov.ar">millescas@ambiente.gov.ar</a>	Presencial
3	Magdalena Vieyra	MAyDS	Directora de administración financiera y presupuestaria de proyectos	<a href="mailto:mvieyra@ambiente.gov.ar">mvieyra@ambiente.gov.ar</a>	Presencial
4	Marisol Díaz Rivera	MAyDS	Coordinadora de residuos peligrosos	<a href="mailto:mdiazrivera@ambiente.gov.ar">mdiazrivera@ambiente.gov.ar</a>	Presencial
5	Florencia Lanzillotta	MAyDS	Coordinadora de la unidad de movimientos transfronterizos	<a href="mailto:mlanzillotta@ambiente.gov.ar">mlanzillotta@ambiente.gov.ar</a>	Presencial
6	Melissa Ciurciolo	PNUD	Ex -Oficial de proyecto		Virtual
7	Matías Mottet	PNUD	Ambiente y Desarrollo	<a href="mailto:Matias.mottet@undp.org">Matias.mottet@undp.org</a>	Presencial
8	Alejandro Puglisi	Cancillería	Oficial de proyectos de implementación nacional		Presencial
9	Camila García Romero	Ministerio de Salud de la Nación	Subsecretario de estrategias sanitarias	<a href="mailto:cgarciaromero@msal.gov.ar">cgarciaromero@msal.gov.ar</a>	Virtual/exportación DDT
10	Andrés Porta	Universidad Nacional de La Plata - CONICET	Director del centro de Investigaciones del Medio Ambiente (CIM)	<a href="mailto:aaporta@yahoo.com.ar">aaporta@yahoo.com.ar</a>	Virtual/Carta Acuerdo monitoreos
11	Daniel Cicerone	Comisión Nacional de Energía Atómica (CNEA)	Gerente de gestión ambiental	<a href="mailto:danielcicerone@cnea.gov.ar">danielcicerone@cnea.gov.ar</a>	Virtual
12	Mónica Spinett	SENASA	Coordinadora de gestión ambiental	<a href="mailto:mspinett@senasa.gov.ar">mspinett@senasa.gov.ar</a>	Virtual/HHPs y PCBS
13	Verónica Viejo Sacha	SENASA	Agente	<a href="mailto:viejosacha@senasa.gov.ar">viejosacha@senasa.gov.ar</a>	Virtual/HHPs y PCBS
14	Daniela Fernández	Mercado Central de Buenos Aires	Jefa de división fiscalización ambiental y desarrollo sostenible	<a href="mailto:mfernandez@mercadocentral.gov.ar">mfernandez@mercadocentral.gov.ar</a>	Virtual
15	Mariel González	Trenes Argentinos	Agente	<a href="mailto:mariel.gonzalez@trenesargentinos.gov.ar">mariel.gonzalez@trenesargentinos.gov.ar</a>	Virtual/ PCBS y HHPs
16	Andrés Carsen	ACUMAR – Comité directivo	Representante nacional	<a href="mailto:acarsen@acumar.gov.ar">acarsen@acumar.gov.ar</a>	Virtual/ RETC

17	Judith Jiménez	Secretaría de Ambiente y Cambio Climático- Provincia de Río Negro	Subsecretaría	<a href="mailto:judithjimenez.rn@gmail.com">judithjimenez.rn@gmail.com</a>	Virtual / Exportación PCBS
18	Pablo Pereira	Asociación MIRA		<a href="mailto:pabluspe@gmail.com">pabluspe@gmail.com</a>	Virtual / Estudios de género
19	Marcela Gulla	TREDI Argentina		<a href="mailto:m.gulla@trediargentina.com.ar">m.gulla@trediargentina.com.ar</a>	Virtual / Exportación PCBS y DDT
20	Verónica Bernardez	Proyecto		<a href="mailto:vbernardez@ambiente.gob.ar">vbernardez@ambiente.gob.ar</a>	Presencial
21	Celeste Grimolizzi	Proyecto		<a href="mailto:mcgrimolizzi@ambiente.gob.ar">mcgrimolizzi@ambiente.gob.ar</a>	Virtual
22	Cecilia Haissaguerre	Proyecto		<a href="mailto:chaisaguerre@ambiente.gob.ar">chaisaguerre@ambiente.gob.ar</a>	Virtual
23	Clara Rusiechi	Proyecto		<a href="mailto:crusiechi@ambiente.gob.ar">crusiechi@ambiente.gob.ar</a>	Virtual
24	Andrés Alfonso	Proyecto		<a href="mailto:aalfonso@ambiente.gob.ar">aalfonso@ambiente.gob.ar</a>	Virtual
25	Daniela Mellado	Proyecto		<a href="mailto:dmellado@ambiente.gob.ar">dmellado@ambiente.gob.ar</a>	Virtual
26	Nenufar Ripoll	Proyecto		<a href="mailto:ncripoll@ambiente.gob.ar">ncripoll@ambiente.gob.ar</a>	Virtual
27	Gala Kreisler	Proyecto		<a href="mailto:gkreisler@ambiente.gob.ar">gkreisler@ambiente.gob.ar</a>	Virtual
28	Agustina Di Vito	MAyDS			Presencial
29	Natalia Oyola	MAyDS			Presencial

## 6.5 Lista de documentos revisados

1. PIF
2. Plan de iniciación del PNUD
3. Documento de proyecto del PNUD
4. Procedimiento de Evaluación Social y Ambiental del PNUD (SESP)
5. Informe de inicio del proyecto
6. Todos los informes de implementación del proyecto (PIR)
7. Informes trimestrales sobre la marcha de los trabajos y planes de trabajo de los diversos equipos de tareas de ejecución
8. Informes de auditoría
9. Finalized GEF focal area Tracking Tools/Core Indicators at CEO endorsement and midterm (Adaptation Monitoring and Assessment Tool – AMAT)
10. Informes de las misiones de supervisión
11. Todos los informes de seguimiento preparados por el proyecto
12. Directrices financieras y administrativas utilizadas por el equipo del proyecto
13. Actas de las reuniones de la Junta y otras reuniones (es decir, reuniones del Comité de Evaluación de Proyectos)
14. Directrices, manuales y sistemas operacionales del proyecto
15. Documento(s) de los programas por países del PNUD
16. Mapas de ubicación del sitio del proyecto
17. Cualquier documento adicional, según corresponda.



## 6.6 Tabla de cofinanciación

Fuente de cofinanciamiento	Nombre de entidad cofinanciante	Tipo de cofinanciamiento	Cantidad cofinanciada a fecha de autorización CEO (US\$)	Cantidad realmente contribuida a fecha del Examen de Mitad de Periodo (US\$)	Porcentaje (%) real de la cantidad prevista
Gobierno Nacional	INTI	En Especie	1 000 000	2 077 800	207,78%
Gobierno Nacional	TRENES ARGENTINOS	En Especie	3 200 000	128 958	4,03%
		Efectivo	1 000 000	343 423	34,34%
Gobierno Nacional	Ministerio de Salud	En Especie	1 735 000	32 435	1,87%
Gobierno Nacional	MERCADO CENTRAL	En Especie	136 650		
		Efectivo	509 900	224 397	44,01%
Gobierno Nacional	SENASA	En Especie	20 500	134 615	656,66%
		Efectivo	725 000	906 512	125,04%
Gobierno Nacional	MAYDS	En Especie	2 366 368	1 183 184	50,00%
Gobierno Nacional	Reglamentos Técnicos	En Especie	2 741 000		
Gobierno Nacional	CNEA	En Especie		98 600	
		Efectivo		33 467	
Gobierno Nacional	Fabricaciones Militares	Efectivo		15 000	
Gobierno Nacional	YCRT	Efectivo		18 465	
<b>Total Gobierno Nacional</b>			<b>13 434 418</b>	<b>5 196 856</b>	
Sector Privado	TREDI	Efectivo	6 559 168	2 564 280	39,09%
Sector Privado	Barrick	Efectivo	7 225 376	2 887 712	39,97%
Sector Privado	VAIRO	Efectivo	951 544		
Sector Privado	Faisan S.A.	En Especie	25 333		
		Efectivo	107 443		
Sector Privado	CABOT Argentina SAIC	En Especie	322 000		
		Efectivo	140 000		
Sector Privado	PROFERTIL	En Especie	5 154 000		
		Efectivo	1 470 000		
Sector Privado	BASF	En Especie	485 100		
		Efectivo	5 600 000		
Sector Privado	Huntsman Argentina	En Especie	45 500		
		Efectivo	17 220		
Sector Privado	Martini Recovering	Efectivo	1 449 961		
Sector Privado	Stockton	Efectivo	262 000	659 573	251,75%
Sector Privado	INDUPA	Efectivo	4 226 146	3 807 554	90,10%
<b>Total sector privado</b>			<b>34 040 791</b>	<b>9 919 118</b>	
PNUD		En Especie	200 000	40 000	
<b>Total PNUD</b>				<b>40 000</b>	
<b>Total GENERAL</b>			<b>47 475 209</b>	<b>15 155 974</b>	<b>31,92%</b>

## 6.7 Formulario firmado del Código de Conducta de UNEG

### Código de conducta de UNEG para evaluadores/consultores del MTR

**Los evaluadores/consultores:**

Deben presentar una información completa y justa en su evaluación de las fortalezas y debilidades, de tal manera que las decisiones o acciones llevadas a cabo se encuentren bien fundadas.

Deben revelar el conjunto completo de conclusiones junto con la información de sus limitaciones y tenerlo a disposición de todos aquellos afectados por la evaluación que posean el derecho expreso para recibir los resultados. Deberán proteger el anonimato y la confidencialidad de los informantes individuales. Deberán ofrecer el máximo tiempo de notificación, limitar las demandas de tiempo y respetar el derecho de las personas a no involucrarse. Los evaluadores deberán respetar el derecho de las personas a otorgar información de manera confidencial, y deben asegurarse de que la información sensible no pueda ser rastreada hasta su origen. Los evaluadores no están obligados a evaluar a personas individuales, pero están obligados a mantener el equilibrio entre la evaluación de las funciones de gestión y este principio general.

En ocasiones, al realizar las evaluaciones, se descubrirán pruebas de delitos. Se debe informar de manera discreta sobre tales casos al órgano de investigación apropiado. Los evaluadores deberán consultar con otras entidades de supervisión relevantes cuando exista la mínima duda sobre si estos temas deberían ser comunicados y de cómo deberían comunicarse.

Deberán ser sensibles hacia las creencias, usos y costumbres y actuar con integridad y honestidad en sus relaciones con todas las partes interesadas. En la línea de la Declaración Universal de Derechos Humanos de las Naciones Unidas, los evaluadores deben ser sensibles hacia los temas de discriminación e igualdad de género. Deberán evitar ofender la dignidad y autoestima de aquellas personas con las que establezcan un contacto durante la evaluación. Sabiendo que existe la posibilidad de que la evaluación afecte negativamente a los intereses de algunas partes interesadas, los evaluadores deberán conducir la evaluación y comunicar el objetivo de ésta y sus resultados de una manera que respete claramente la dignidad y la autoestima de los implicados.

Son responsables de su actuación y (los) producto(s) que generen. Son responsables de una presentación escrita u oral clara, precisa y equilibrada, así como de las limitaciones, conclusiones y recomendaciones del estudio.

Deberán aplicar procedimientos contables sólidos y ser prudentes a la hora de utilizar los

recursos de la evaluación. Formulario de Acuerdo del Consultor del MTR.

Acuerdo para acatar el Código de Conducta para Evaluadores del sistema de la ONU:

Nombre del Consultor: Anna M. Ortiz

Nombre de la Organización Consultora (cuando sea necesario):  
\_\_\_\_\_

Afirmo que he recibido y entendido y que acataré el Código de Conducta para Evaluadores de las Naciones Unidas. Firmado en San José, Costa Rica a ser el 14 de junio del 2023.

Firma:  \_\_\_\_\_

## 6.8 Formulario de aprobación del informe final del MTR

Formulario de Autorización del informe del MTR

*(Deberá completarse por la Unidad Adjudicadora y el RTA del PNUD-GEF e incluirse en el documento final)*

**Informe de Examen de Mitad de Periodo Revisado y Aprobado por:**

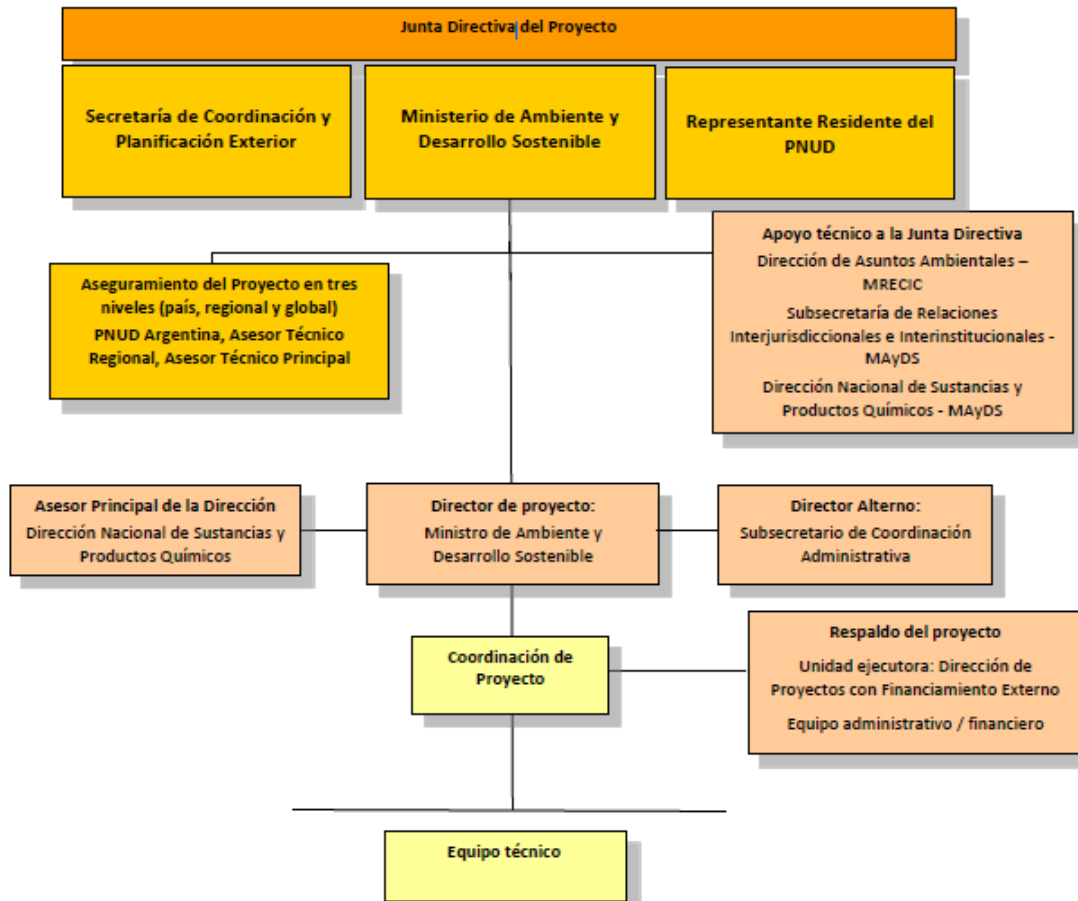
Unidad Adjudicadora

Nombre: \_\_\_\_\_

Firma: \_\_\_\_\_ Fecha: \_\_\_\_\_

Asesor Técnico Regional del PNUD-GEF

## 6.9 Estructura de Organización del Proyecto



## 6.10 Anexo en archivo separado: Rastro de auditoría

A los comentarios recibidos en (fecha) de la Evaluación de mitad de período de ARG20G27 "Manejo ambientalmente racional de COP, mercurio y otros productos químicos peligrosos en Argentina", PIMS # 6281.

*Se formularon las siguientes observaciones en el marco de los cambios introducidos en el proyecto de informe sobre el examen de mitad de período; se hace referencia a ellos por institución (columna "Autor") y no por el nombre de la persona, y el número de comentario de cambio de seguimiento (columna "#"):*

<b>Autor</b>	<b>#</b>	<b>Párrafo No. / Ubicación del comentario</b>	<b>Comentarios/retroalimentación sobre el proyecto de informe del examen de mitad de período</b>	<b>Respuesta y medidas del equipo de examen de mitad de período Tomado</b>

