
**Mid-Term Review of the UNEP/Global
Environment Facility project:**

***“Global Best Practices on Emerging Chemical
Policy Issues of Concern under the Strategic
Approach to International Chemicals Management
(SAICM)”***

(GEF Project ID: 9771)

**FINAL REPORT
1 December 2021**





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For further information on this report, please contact:

Ms. Eloise Touni

Task Manager, GEF Chemicals and Waste

UNEP Programme, Economy Division

MIE, 11-13 chemin des Anémones, CH-1219 Chatelaine, Geneva, Switzerland

Tel: +41 22 917 86 07

Email: Eloise.Touni@un.org

Global Best Practices on Emerging Chemical Policy Issues of Concern under the Strategic Approach to International Chemicals Management (SAICM)

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About the Review¹

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Brief Description: This report is a Mid-Term Review (MTR) of the UNEP-implemented, GEF-financed full-sized project “*Global Best Practices on Emerging Chemical Policy Issues of Concern under the Strategic Approach to International Chemicals Management (SAICM)*” (PIMS# 9771). The UNEP-GEF SAICM project is a multi-stakeholder initiative that aims to accelerate the adoption of national and value chain initiatives to manage Emerging Policy Issues by promoting regulatory and voluntary action by government and industry to phase out lead in paint, lifecycle management of chemicals present in products, and knowledge management and stakeholder engagement and contribute to the 2020 SAICM goal and the 2030 Agenda for Sustainable Development. The project is being implemented in over 40 countries over a 4-year period, bringing together governments with the unprecedented collaborative efforts of intergovernmental and non-governmental organizations, industry, consumers, and citizens; and driving engagement among the stakeholders in identifying country-level priorities and management strategies.

The review has two primary purposes: (i) to provide evidence of results to meet accountability requirements, and (ii) to promote learning, feedback, and knowledge sharing through results and lessons learned among UNEP, the GEF, the SAICM Secretariat, and the participating countries. The MTR also has a secondary more pragmatic purpose, as it is coming relatively late in the project cycle, to help it prepare for the forthcoming TE in earnest.

Key words: Emerging Policy Issues; EPIs; SAICM; lead in paint; LIP; lead elimination; Lead Paint Alliance; chemicals of concern; chemicals in products; International Conference on Chemicals Management, International POPs Elimination Network, Inter-Organization Programme for the Sound Management of Chemicals, mid-term review, UNEP, GEF.

Mid-Term Review Consultant:

Camillo Ponziani

Managing Director, [Interamna Group Inc.](#)

Email: cponziani@interamnagroup.com

This report has been edited by Sharon Creasey

¹ This data is used to aid the internet search of this report on the Evaluation Office of UNEP website.

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First and foremost, this review is not really the work of the mid-term review consultant, but rather is a joint effort and represents the collective input by all the partners and stakeholders connected with the SAICM project who gave freely of their time, and most importantly, their hard work to make the entire review process run smoothly.

I would like to thank the interviewed project participants for generously sharing their time and ideas with the evaluation. In particular, appreciation is extended to Eduardo Caldera Petit of the Project Execution Unit and Eloise Touni, GEF Task Manager, for the frequent and frank exchanges, as well as for their valuable assistance in contributing to the evaluation agenda, sharing documentation and facilitating introductions as needed. Finally, my thanks to Mr. Feraidoon Khosravi for his valuable assistance and facilitation skills, and to Sharon Creasey, for her editing expertise.

The review is intended to give a summary of what has been achieved by the SAICM project to date, as well as glean some of the critical lessons that can be learned from it thus far. In the report, I have tried to offer constructive criticism where it is warranted and sincerely hope that those involved in the project take it as such.

About the Review Consultant

Camillo Ponziani is an independent evaluation and management consultant who has reviewed myriad environmental conservation, protected areas, biodiversity and sustainable development initiatives over the past 15 years. He is based in Toronto, Canada.

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Table of Contents

About the Review	III
Acknowledgements	IV
About the Review Consultant	IV
Document Revision History	V
Consolidated List of Acronyms & Abbreviations	1
Project Information Table	3
Executive Summary	5
A. Introduction	5
B. Evaluation Findings	6
C. Summary of Emerging Lessons Learned	15
D. Conclusions and Recommendations	16
1. Introduction	22
1.1 Project Context and Overview	22
1.2 Description of the Project	22
1.3 Project Partners and Stakeholders	24
1.4 Implementation Arrangements and Governance	33
1.5 Project Financing	36
1.6 Changes During Implementation	36
1.6.1 <i>Changes to Design</i>	36
1.6.2 <i>Changes to Budget and Timelines</i>	37
1.6.3 <i>External Changes since Project Outset</i>	37
2. Mid-Term Review Scope, Objectives and Methodology	39
2.1 Subject and Scope of the Review	39
2.2 Review Objectives	39
2.3 Review Methods	39
2.3.1 <i>Approach</i>	40
2.3.2 <i>Data Collection</i>	40
2.4 Limitations of the MTR	41
2.5 Review Criteria and Ratings	42
2.5.1 <i>Rating scale</i>	43
3. Reconstructed Theory of Change at Evaluation	45
4. Review Findings	49
4.1 Strategic Relevance	49
4.2 Effectiveness	52
4.2.1 <i>Availability of Outputs</i>	52
4.2.2 <i>Availability of Project Outcomes</i>	65
4.2.3 <i>Likelihood of Impact</i>	73

4.3	Financial Management	75
4.4	Efficiency	77
4.5	Monitoring and Reporting	81
4.6	Sustainability and Replication	95
4.6.1	<i>Socio-Political Sustainability</i>	96
4.6.2	<i>Financial Resources</i>	96
4.6.3	<i>Institutional Framework</i>	97
4.6.4	<i>Environmental Sustainability</i>	99
4.6.5	<i>Catalytic Role, Replication and Up-scaling</i>	99
4.6.6	<i>Key Elements to an Effective Sustainability and Transition Strategy</i>	99
4.7	Factors Affecting Performance	100
4.7.1	<i>Preparation and Readiness</i>	100
4.7.2	<i>Quality of Project Implementation and Execution</i>	101
4.7.3	<i>Stakeholder Participation and Cooperation</i>	102
4.7.4	<i>Responsiveness to Human Rights and Gender Equity and Environmental and Social Safeguards</i>	104
4.7.5	<i>Country Ownership and Driven-ness</i>	105
4.7.6	<i>Communications and Public Awareness</i>	106
5.	Conclusions, Lessons and Recommendations	107
5.1	Conclusions	107
5.2	Lessons Learned	112
5.3	Recommendations	113
	Annex A: Terms of Reference	118
	Annex B: Evaluation Framework Matrix	119
	Annex C: List of Documents Consulted	126
	Annex D: List of Interviews Conducted	129
	Annex E: Master List of Indicative Questions	131
	Annex F: Theory of Change and Results Framework Review Workshop Presentation	133
	Annex G: Results of Online Questionnaire	134
	Annex H: Presentation of Findings and Preliminary Recommendations	135
	Annex I: Summary of Co-Financing	136
	Annex J: CV and Short Biography of the Review Consultant	137
	Annex K: Official MTR Ratings Scale and Weightings Table	138
	Annex L: Recommendations to the Project's Results Framework	140
	Annex M: Problems the Project Seeks to Address	150
	Annex N: Audit Trail of Comments	154

Consolidated List of Acronyms & Abbreviations

ABA-ROLI	American Bar Association – Rule of Law Initiative
AMCEN	African Ministerial Conference on Environment
BAT/BEP	Best Available Techniques and Best Environmental Practices
BCRC China	Basel Convention Regional Centre for Asia and the Pacific
CEE	Central and Eastern Europe
CHB	Chemicals and Health Branch (UNEP)
CiP	Chemicals in Products
CoC	Chemicals of Concern
CoP	Communities of Practice
CTCN	Climate Technology Centre and Network
EA	Executing Agency
ECOWAS	Economic Community of West African States
EDCs	Endocrine Disrupting Chemicals
EPEAT	Electronic Product Environmental Assessment Tool
EPIs	Emerging policy issues
EPPP	Environmentally persistent pharmaceutical products
FAO	Food and Agriculture Organization of the United Nations
FSP	Full-sized project
GABC	Global Alliance for Buildings and Construction
GEC	Green Electronics Council
GEF	Global Environment Facility
GEFTF	Global Environment Facility Trust Fund
HHP	Highly hazardous pesticides
IA	Implementing Agency
ICCM	International Conference on Chemicals Management
ICLEI	Local Governments for Sustainability
IOMC	The Inter-Organization Programme for the Sound Management of Chemicals
IPEN	International POPs Elimination Network
IISD	International Institute for Sustainable Development
ILPPW	International Lead Poisoning Prevention Week
ISC3	International Sustainable Chemistry Collaborative Centre
KM	Knowledge Management
LCA	Lifecycle Assessment
LAC	Latin America and the Caribbean Region
LDCs	Least developed countries
LiP	Lead in Paint
LMIC	Lower- and Middle-Income Countries
LTA	Long-Term Agreement
MEAs	Multilateral Environment Agreements
MoU	Memorandum of Understanding
MSP	Medium Sized Project
NCPC	National Cleaner Production Centre
NLPPW	National Lead Poisoning Prevention Week
NTU	Nanyang Technological University
OECD	Organisation for Economic Co-operation and Development
OEWG	Open-Ended Working Group
PBT	Persistent, Bioaccumulative and Toxic
PEU	Project Execution Unit
PIR	Project Implementation Report
POPs	Persistent Organic Pollutants

PoW	Program of Work
ProDoc	Project Document
PSC	Project Steering Committee
RFS	Request for Services
RMB	Resources and Markets Branch (UNEP)
SAICM	Strategic Approach to International Chemicals Management
SCP	Sustainable Consumption and Production
SDG	Sustainable Development Goals
SPP	Sustainable Public Procurement
SIDS	Small Island Developing States
SMEs	Small and Medium-sized enterprises
SRADev	Sustainable Research and Action for Environmental Development, Nigeria
SRIF	Safeguard Risk Identification Form
ToC	Theory of Change
ToR	Terms of Reference
UCT	University of Cape Town
UNEP	United Nations Environment Programme
UNFCCC	United Nations Framework Convention on Climate Change
UNITAR	United Nations Institute for Training and Research
UNON	United Nations Office in Nairobi
USEPA	United States Environmental Protection Agency
VOCs	Volatile Organic Compounds
VWG	Virtual Working Groups
WEEE	Waste Electrical and Electronic Equipment
WHO	World Health Organization
WRF	World Resources Forum

Project Information Table

Table 1: Project Identification Summary			
Title:	Global Best Practices on Emerging Chemical Policy Issues of Concern under the Strategic Approach to International Chemicals Management (SAICM)		
Implementing Agency:	UNEP - Economy Division, GEF Chemicals and Waste, Chemicals and Health Branch	Executing Agency:	SAICM Secretariat
Key executing partners:	UNEP Chemicals & Health Branch; Resources & Markets Branch, World Health Organization, IPEN, USEPA, American Bar Association, National Cleaner Production Centres and others		
Sub-contractors:	A total of 24 contractual agreements with: C1 - ABA-ROLI, ECOWAS, IPEN ² , NCPC China, NCPC Jordan, NCPC Peru, NCPC Serbia, World Health Organization; C2 - BCRC China, Bioregional, El Bosque, ICLEI, NCPC Colombia, NCPC Sri Lanka, UNITAR, USEtox [®] , WRF; C3 - IISD, UCT; Regional Offices - Africa, Asia-Pacific, Central and Eastern Europe (CEE) and Latin America and the Caribbean		
GEF Project ID:	9771	GEF Agency Project ID (IMIS) / Umoja No.:	01571 / SB-007600
Link to SDG target(s) & indicator(s) per ProDoc:	Goal 3, Target 3.9 Goal 12, Target 12.4	UNEP sub-programme:	Sub-programme 5: Chemicals, waste and air quality Sub-programme 6: Resource Efficiency
Expected accomplishment(s) (PoW 2018-2019):	PoW 5: (a) (i) 5, (a) 3 a, indicator (ii) a, indicator (i) a, -6	Programme of Work output(s) (PoW 2018-2019):	EA b, Output 1, indicator (i) & (ii)
PIF submitted to GEFSec:	02 March 2017	PIF approved for PPG Initiation:	01 May 2017
UNEP PRC approval date:	27 August 2018	GEF approval date (Date of CEO Endorsement):	8 August 2018
Start of implementation:	13 November 2018	Date of first disbursement:	15 November 2018
Project duration:	48 months	No of revisions:	No legal instrument revision. Only internal budget line minor updates by Steering Committee effected to date
Project type:	Full-sized	Focal area(s):	Chemicals and Waste

² The Project has two separate contracts under execution by IPEN for activities under Component 1 and 3 respectively.

GEF strategic priority:	GEF-6 Strategic Objective 1 and 2	GEF operational programme #:	<p>CW1 – Program 1 (Develop and demonstrate new tools and economic approaches for managing harmful chemicals and waste in a sound manner)</p> <p>CW2 – Program 3 (Reduction and elimination of POPs)</p> <p>CW2 – Program 6 (Support regional approaches to eliminate and reduce harmful chemicals and waste in LDCs and SIDS)</p>
Planned completion date (operational closure):	13 November 2022 ³	Date of financial closure:	13 November 2023 ⁴
GEF grant allocation / co-financing / total cost:	USD 8,190,000.00	USD 21,312,903.00	USD 29,502,903.00
Total GEF disbursement at MTR (as of 30 June 2021):	USD 3,288,467.00	Co-financing mobilized at MTR (as of 30 June 2021):	USD 13,959,031.00
No. of Steering Committee meetings held to date:	5	Next Steering Committee meeting:	30 th September 2021
Mid-term review planned date / actual date:	1 May 2021 / May to September 2021	Terminal Evaluation (planned date):	13 August 2022 ⁵
Coverage:	Global	Participating country(ies):	Colombia, Peru, Ecuador, Jordan, Nigeria, Indonesia, China and Sri Lanka

³ In spite of being a 48-month (4 year) duration, both the 2021 PIR and MTR ToRs note a planned closure date 31 March 2023. The MTR consultant has not seen any formal documentation supporting an extension to the Project timeline and the minutes from the 5th meeting of the Project Steering Committee held 28 January 2021 still references a 48-month implementation timeline.

⁴ Per [GEF/C.55/04/Rev.01](#) (December 20, 2018), "Policy measures to enhance operational efficiency, accountability and transparency", projects are afforded an upper limit of 12 months for the time elapsed from the completion of the terminal evaluation to financial closure.

⁵ Both the 2021 PIR and MTR ToRs note 1 September 2023 for the start date of the Terminal Evaluation (TE). These are errors which should be corrected going forward given the Project's 48-month duration and an official start date of 13 November 2018. As per GEF guidance and best practice, the TE is to start 3 months prior to the operational closure of a project. Per the Project's Internal Agreement the stated completion date is 30th September 2022.

Executive Summary

A. Introduction

1. The global full-sized UNEP-supported GEF-financed project titled “*Global Best Practices on Emerging Chemical Policy Issues of Concern under the Strategic Approach to International Chemicals Management (SAICM)*” (referred to henceforth interchangeably as either “the Project” or “the SAICM project”) commenced operations on 13 November 2018 and is being implemented by the UNEP Economy Division. The Project is being executed by the SAICM Secretariat.
2. Over its 48-month implementation timeline, the Project aims to accelerate the adoption of national and value chain initiatives to control Emerging Policy Issues (EPIs) and contribute to both the 2020 SAICM goal⁶ and the 2030 Agenda for Sustainable Development. Following a number of administrative, operational and procurement-related setbacks at the outset, activities started in 2019 and involve the participation of myriad stakeholders, executing partners and sub-contractors.
3. The Project is currently being implemented by over 25 partners/organizations. A total of 24 sub-contracts have been negotiated with different global partners to date, including Regional Organizations, Intergovernmental Organizations (IGOs) Non-Governmental Organizations (NGOs), National Cleaner Production Centres (NCPCs), and Academia, for the implementation of the Project activities at the regional and national levels, across its three mutually-supportive components: (i) promoting regulatory and voluntary action by government and industry to phase out **lead in paint**; (ii) lifecycle management of **chemicals present in products**, and; (iii) **knowledge management** and stakeholder engagement.
4. The Project’s total funding envelope stands at USD 29,502,903.00, with USD 8,190,000.00 earmarked from the GEF Trust Fund (GEFTF) and a total of USD 21,312,903.00 in pledged co-financing across 35 entities, noted in Section C of the Project Document (ProDoc).
5. Per the UNEP Evaluation Policy⁷ and the UNEP Programme Evaluation Manual⁸, this MTR is being undertaken slightly later than the halfway mark of project implementation, largely owing to a combination of factors including its lengthy start-up and inception phase, a Project Execution Unit (PEU) which only became fully staffed in late 2019 and a well-placed intention to make up for lost ground. The aim of the MTR is to analyze whether or not the project is on-track, what problems and challenges the project is encountering, and which augmentative / corrective actions might be

⁶ This goal aims to ensure: “by 2020, that chemicals are used and produced in ways that lead to the minimization of significant adverse effects on human health and the environment”

⁷

<https://wedocs.unep.org/bitstream/handle/20.500.11822/7100/UNEP%20Evaluation%20Policy%202016.pdf?sequence=1&isAllowed=y>

⁸

<https://wedocs.unep.org/bitstream/handle/20.500.11822/7110/Evaluation%20Manual%202008.pdf?sequence=1&isAllowed=y>

warranted to put it back on the right footing towards realizing its stated objective and outcomes.

6. The MTR had two primary purposes: (i) to provide evidence of results to meet accountability requirements, and (ii) to promote learning, feedback, and knowledge sharing through results and lessons learned among UNEP, interested governments, the GEF and their partners. The evaluation was guided by a set of key questions that are listed both in relevant sections of this report and the appended Terms of Reference (Ref. Annex A).

B. Evaluation Findings

7. The Mid-Term Review, the conclusions and recommendations drawn herein, are based on a combination of: (i) an in-depth desk review of documents related to the SAICM project; (ii) virtual interviews (both structured and unstructured) with stakeholders via Zoom or by phone; (iii) information gathered through an online questionnaire with questions mapping to aspects of the Project's strategy / design, planning and reporting, inception and project delivery; and finally (iv) a dedicated workshop with the PEU and component leads to collectively revisit the Project's Results Framework and Theory of Change. In order to assess the Project's likelihood, a revised Theory of Change was developed based on the information contained in the ProDoc.
8. The MTR's findings indicate that for all intents and purposes, the SAICM project has been a successful initiative to date, with further room to gain momentum and deliver planned impacts in the remaining year of implementation, as final tools and products are launched, come online and are disseminated widely. The SAICM project offers an innovative and inclusive approach to linking pressing environmental and human health concerns with enhanced legislation, a range of quantitative lifecycle management and supply chain decision-making tools and hands-on technical assistance related to lead in paint (LiP) and chemicals in products (CiP); achieved through mutually beneficial thematic partnerships forged between strong international organizations and the private sector.
9. The Project has played an instrumental and catalytic role in helping to showcase and operationalize the work of the SAICM framework, its partners and key consortiums for two of its [eight EPIs](#). Where possible, the Project has also consciously extended its scope by advancing knowledge on the EPI of Highly Hazardous Pesticides (HHPs) that was ultimately cut in the final stages of the Project's approval, and to address gaps pertaining to knowledge on Persistent Pharmaceutical Products (EPPPs) and Endocrine Disrupting Chemicals (EDCs), resulting from a parallel medium-sized GEF initiative that has yet to make it off the ground.
10. With restrictions due to the global COVID-19 pandemic and the subsequent postponement of key meetings informing the SAICM Beyond 2020 (henceforth "Beyond 2020") process, such as the Fourth Meeting of the Intersessional Process (IP4) and the Fifth session of the International Conference on Chemicals Management (ICCM5), intersessional preparatory work has been undertaken through Virtual

Working Groups (VWGs). The Project has filled a void in the Beyond 2020 negotiations by playing a complimentary and symbiotic role to the VWGs through the proliferation of scientific literature, technical guidance documents, policy briefs and discussions on its knowledge management platform on key thematic areas and current EPIs and issues of concern. Moreover, [a research paper with proposed targets and indicators for the Beyond 2020 framework](#) was produced by the Project and used in the discussions on the VWG1. Finally, the communities of practice established by the Project in June 2020, have facilitated exchanges amongst SAICM stakeholders on EPIs and continued momentum despite the postponement of IP4 and ICCM5, and have barely scratched the surface of their potential to support the SAICM framework going forward. It is important to note that Project also demonstrated adaptive management in this regard by pivoting to online meetings and webinars where it was feasible to do so, with countries to provide technical expertise and continue momentum toward project targets.

11. While there is always room for improvement and any project should strive to do better, it has been uncharacteristically difficult for the Review consultant to identify major deficiencies in the SAICM project, largely due to its solid strategy, seasoned management, and cadre of mature, committed, and ambitious partners. The Project has achieved many of its mid-term targets and with some required re-alignment and minor adjustments to the Results Framework to reflect the evolving operational landscape, it is on track to delivering planned outputs and results. In the case of its work on knowledge management and stakeholder engagement, the Project has even realized its end-of-project targets for outcome three. Activities that were slow out of the gate are hitting their stride, have gained the necessary traction to generate successes and are no longer a concern as they were in earlier stages of implementation. Most importantly, the Project is cognizant of and is generating the enabling conditions to sustain key results.
12. With critical support provided by the American Bar Association Rule of Law Initiative (ABA-ROLI), NCPC Serbia, United States Environmental Protection Agency (USEPA), the World Health Organization (WHO) and the International Pollutants Elimination Network (IPEN), the Project has had a tangible impact on the passing of national legal frameworks and transitioning to lead-free paint, owing to bespoke adaptations of an existing model law and reformulation demonstrations with SMEs, although further thinking is required to sustain this model post-project to effectively support all Components. With many of the technical guidance documents and tools to track and manage chemicals of concern (CoCs) in products still in draft form and awaiting consultation, impacts have been slightly less tangible, but promising nonetheless. The impact achieved in this respect reflects more on project design and the inherent “greenfield” nature of this component two, rather than performance.
13. With respect to the work on LiP, there has been a measurable increase in the number of countries that have adopted legislation to establish legal limits for Lead in Paint that can be attributed to the Project’s efforts. A total of 15 countries have passed lead paint legislation with the project support while 19 other countries are in the latest stages of adopting such laws. Moreover, 14 paint manufacturers in 8 countries have completed the paint reformulation process through technical demonstrations and are able to

produce lead-free paint, with another 22 small-medium enterprises (SMEs) actively participating in the demonstrations and in the pipeline of switching.

14. On the CiP stream, the Project has generated several outputs of recognized technical quality that have a high impact potential. A total of 5 guidance reports have been published (2 on toys, 1 on building products, 2 on electronics) that will be tested on a pilot basis in the time remaining. A showpiece of the Project is USEtox[®], a Chemical Toxicity Assessment tool allowing governments and value chain actors to apply lifecycle management across key sectors to track and manage CoCs in their products. Through the SAICM Project, USEtox[®] sub-models for toys and building products have been updated to enable screening and comparing chemical risks. Finally, 2 eco-innovation manual supplements for building products and electronics, as well as global guidance in the procurement of electronic products are ready for testing.

15. Awareness and capacities for addressing both LiP and CiP were strengthened through a mixture of global and national events, in-country training workshops given by international subject-matter experts, and visits to SMEs in selected countries for direct assistance. With COVID-19 travel restrictions in place since the second quarter of 2020, many of the Project's trainings were conducted virtually. However, as metrics for International Lead Poisoning Prevention Week⁹ (ILPPW) show, participation has been robust and even increased during the global pandemic in spite of events being held virtually. The training and technical support provided by the Project under output(s) 1.1, 1.2 and 2.2 were very much appreciated and considered to be of high quality by all interviewed participants. Further training is planned upon completion of remaining tools and guidance documents under the CiP component. A summer-school course on USEtox[®] modeling fundamentals was held in 2019 at Nanyang Technological University (NTU), Singapore and subsequently followed up by a virtual course in 2020 at the 30th Annual Meeting of the Society of Environmental Toxicology and Chemistry (SETAC) and most recently from 7-11 June 2021.



"I AM COLLABORATING MORE WITH OTHER ORGANIZATIONS BECAUSE OF THIS PROJECT AND THE TRAINING I RECEIVED. I HAVE ACCESS TO MORE TOOLS AND RESOURCES FOR MY ROLE"

"VIRTUAL TRAINING SEEMS TO WORK WELL AND HAS BEEN WELL-RECEIVED"

"THE BARRIER TO ENTRY HAS BEEN QUITE LOW AS THERE HAS BEEN WIDE UPTAKE OF TELECONFERENCING TOOLS AND SOFTWARE"

"WHILE THERE IS NO SUBSTITUTE FOR FACE-TO-FACE MEETINGS, WE REALLY HAD NO CHOICE AND DID THE BEST WE COULD TO SUPPORT SMES IN MY REGION TO REFORMULATE THEIR PRODUCT"

- STAKEHOLDER PERSPECTIVES FROM MTR INTERVIEWS

participation has been robust and even increased during the global pandemic in spite of events being held virtually. The training and technical support provided by the Project under output(s) 1.1, 1.2 and 2.2 were very much appreciated and considered to be of high quality by all interviewed participants. Further training is planned upon completion of remaining tools and guidance documents under the CiP component. A summer-school course on USEtox[®] modeling fundamentals was held in 2019 at Nanyang Technological University (NTU), Singapore and subsequently followed up by a virtual course in 2020 at the 30th Annual Meeting of the Society of Environmental Toxicology and Chemistry (SETAC) and most recently from 7-11 June 2021.

16. Knowledge is the primary asset of the SAICM project, and knowledge generation and sharing are critical for GEF investments to achieve a lasting impact post-project. Unifying the products and services developed under the LiP and CiP components in a knowledge management (KM) platform, is anchored to a "living" knowledge

⁹ Held each year during the month of October, International Lead Poisoning Prevention Week is seen as an important conduit to accelerate the global phase out of lead paint.

management strategy. An initial prototype was launched in March 2020 and was opened for feedback from relevant stakeholders between April - October 2020 to inform enhancements of a subsequent release. The aim of having a new platform by the end of 2020 was scuppered by procurement delays at UNON lasting well over six months in establishing a Long-Term Agreement (LTA) with pre-qualified companies to undertake IT-related work within UNEP as a whole. A breakthrough in May 2021 led to the Project issuing a Request for Services (RFS) and at the time of writing, the selection of a vendor is imminent. The intent is to now migrate to a new KM platform no later than the beginning of February 2022 as the hosting agreement for the current site expires shortly thereafter.

17. The KM platform houses four SAICM Communities of Practice (CoP), each with over 200 registered members¹⁰ and led by the University of Cape Town (UCT), to provide a space for interactive discussions, exchanges of best practices on the sound management of chemicals and waste among SAICM stakeholders and long-term engagement. With CoPs on HHPs, LiP, CiP and a cross cutting theme of chemicals and SDGs, the Project has strategically positioned them beyond the scope of the Project in an effort to break silos and expand across sectors. The postponement of ICCM5 has impacted the Project's ability, through the KM platform, to design a tracking and monitoring system for progress on the targets & indicators of the Beyond 2020 framework; there is currently no data that can be used for geocoordinate mapping as initially budgeted. The KM platform also includes information linked to existing efforts, such as the Global Alliance to Eliminate Lead Paint, among others. The inclusion of useful tools and guidance such as the interactive lead paint map is particularly useful and should be transitioned to the new KM platform when migration is undertaken.
18. Although the MTR noted high levels of overall performance there are a number of shortcomings. There is no direct evidence that the Project has made a difference to a portion of its general objective of contributing to the 2030 Agenda for Sustainable Development. This is mainly due to its design and insufficient indicators in the Results Framework linking the Project's actions to SDG targets 3.9¹¹ and 12.4¹², respectively. While the Project, through the CoP on chemicals and SDGs, is indeed cognizant of the cross-cutting linkages and has made an effort to surface them through specific thematic discussions, including one on the shortcomings of SDG target 12.4 on sound chemicals and waste management, the contribution to this dimension of the objective is tenuous at best.
19. One of the weaknesses of the Project observed by the Review consultant, is the Results Framework. Surprisingly, no changes were made to any of the indicators or targets during the Project's inception phase in spite of obvious misalignment between targets at the objective, outcome and output levels and other examples of suboptimal

¹⁰ From academia, governments, industry, intergovernmental organizations, non-governmental organizations, consumers, and private citizens.

¹¹ **Target 3.9:** By 2030, substantially reduce the number of deaths and illnesses from hazardous chemicals and air, water and soil pollution and contamination.

¹² **Target 12.4** is comprised of the following sub-indicators: **Indicator 12.4.1:** Number of parties to international multilateral environmental agreements on hazardous waste, and other chemicals that meet their commitments and obligations in transmitting information as required by each relevant agreement; and **Indicator 12.4.2:** (a) Hazardous waste generated per capita; and (b) proportion of hazardous waste treated, by type of treatment.

oversight, such as poor description of baselines, which have persisted for nearly two years following the establishment of the PEU. Many of the indicators, baselines and end of project targets were not sufficiently 'SMART' (Specific, Measurable, Achievable, Relevant and Time-bound), thereby making it difficult to measure progress towards results in an objective manner. The MTR process facilitated a workshop to collectively revisit the Results Framework and Theory of Change (ToC) to shed light on the key impact pathways that are likely to deliver results. Reference is made to Table 11 and Annex M.

20. From a risk perspective (also underpinned by the Project's assumptions), aspects of the project objective and outcomes related to the number of countries implementing legislation to restrict the use of lead in paint may be difficult to achieve as currently written since these are influenced by factors outside the Project's immediate control. Furthermore, a number of important outputs related to CiP (i.e., toy audits in China and revamping the building code in Sri Lanka for CoCs) may need to be modified because the underlying strategy requires buy-in from government, industry or, other external actions outside the project's direct influence. The complexity of these processes may have been mis-judged at design and could prevent the Project from reaching some of the implementation-driven higher order outputs and outcomes on the scale envisioned. A measurable impact on both fronts to the extent envisaged in the ProDoc will require the broader adoption of legislation, careful monitoring and encouraging the broader uptake of key supply chain tools within industry, and continued support for training and technical demonstrations by the Project. Another significant risk is the recent insolvency of the NCP in Colombia, tasked with developing and piloting Sustainable Public Procurement guidelines for the electronics sector. A range of mitigations are being considered by the Project.
21. With proper risk mitigation strategies in place and the revisiting of targets, these risks do not necessarily need to lead to Project issues that threaten overall delivery. The experiences to date however, provide an interesting case study on the implications of design choices and how good performance and strong management can fall short of achieving planned targets when the intermediate states linking outputs to outcomes are beyond one's control and consequently impact is not reached.
22. A series of contributing factors have influenced project performance and the level of achievement thus far. These include (i) over-ambitious project design in relation to the allocated time and aggressive legislative targets; (ii) uneven preparedness and familiarity with the implementation of GEF-financed initiatives; (iii) administrative hurdles and lengthy procurement delays; (iv) the commendable performance of the extended project team (Project Execution Unit, component leads and key consultants) and a number of "champion" partners, who have driven the implementation process and have been decisive in the Project's achievements to date; (v) the channels for stakeholder participation and national ownership through the KM platform and NCPs; and (vi) the recognized guidance and support of the UNEP Task Manager who has monitored the Project closely along with the Project Steering Committee (PSC). It has also surfaced the need for and how critical it is to have trained / seasoned project managers to lead critical pillars of the Project.

23. Strategic Relevance. This project is relevant in both concept and approach by strengthening the business case for validating supply chain practices and the sound management of hard-hitting chemicals (which can cause irreversible effects on human health and the environment) throughout their life cycle, with a special emphasis on Low- and Middle-income Countries (LMICs). It had a high level of global policy relevance by supporting the implementation of international environmental frameworks. In particular, it promoted provisions of the SAICM framework and has helped operationalize efforts towards the achievement of the 2020 goal on two of its EPs. The Project is part of sub-programme 5 on Chemicals and Waste in UNEP's Programme of Work (PoW), as it provides dedicated support to institutional strengthening at the national level towards the implementation of the SAICM. Likewise, the project objective is consistent with UNEP's Medium-Term Strategy 2018-2021, and PoW for the first biennium 2018-2019. It is also consistent with the GEF-6 Strategic Priority Objectives 1 and 2, on developing the enabling conditions, tools and environment for the sound management of harmful chemicals and wastes; and reducing the prevalence of harmful chemicals and waste and supporting the implementation of clean alternatives, respectively. The SAICM project supports a broader push among global effort to promote the sound management of chemicals and wastes, and as such is aligned with the Global Alliance to Eliminate Lead Paint (Lead Paint Alliance) 2012 and most recent business plans, as well as efforts of both the UNEP CHB CiP programme and the Inter-Organization Programme for the Sound Management of Chemicals. Finally, the project has also provided a model of international cooperation to strengthen national environmental governance through the development of national lead paint laws informed by the Model Law. This process can be applied to other chemicals or environmental issues as well.

24. Effectiveness. The SAICM project is currently on target in the delivery of outputs and in some cases already exceeding the set targets within planned budget and timeframe. Outcomes are most likely to be achieved by the end the Project, with some readjustments to the Project's efforts and attribution as mentioned above. No evidence of negative impacts on vulnerable groups, human health or on the environment have been observed during the MTR. While activities

"THE LOST YEAR IN ISSUING CONTRACTS TO LOCAL PARTNERS IS CERTAINLY A MISSED OPPORTUNITY FOR THE PROJECT. WE COULD HAVE FINISHED A LOT AHEAD OF SCHEDULE. WE WERE MET WITH MORE DELAYS BECAUSE OF COVID-19"

"VIRTUAL TRAINING SEEMS TO WORK WELL AND HAS BEEN WELL-RECEIVED"

- STAKEHOLDER PERSPECTIVES FROM MTR INTERVIEWS

may cause eventual disruption to lead pigment suppliers, there is runway to adapt and companies should be thinking about shifting their business models anyways as more countries pass legislation to restrict lead in paint. Although too early to predict at this juncture, there are good chances for achievement of the intended impact - to decrease the negative effects of chemicals on health from LiP and CiP - in the long term.

25. Financial Management. All key and current information on budget and expenditures for the SAICM Project has been provided to the Review consultant. Communication has been timely and requests for further information and documentation fulfilled expeditiously by the PEU. As of 30 June 2021, cumulative expenditure stands at USD

3,288,467.00 or 40% of the GEF budget, with a further USD 13,959,031.00 in co-financing (65.5% of what has been pledged) having been mobilized by the Project. With the Project running a surplus for a number of budget lines, the financial forecast not reached for several activities and with only 40% of the GEF financing spent, it may seem a challenge to spend the balance in the time remaining¹³. Total budget obligations are close to the GEF envelope and the current burn rate is promising; however, a budget revision is warranted at this juncture to reallocate unspent funds and streamline budget lines where possible.

26. Efficiency. The Project has been, for the most part, efficiently implemented and most outputs have been satisfactorily delivered within the planned budget and timeframe. Adaptive management has saved time and money. Progress on achieving a regional

ECOWAS standard for LiP has been hampered by heavy procedural and administrative issues characteristic of regional political and economic unions. Budget revisions helped to re-program unspent funds and make transfers between budget lines. The MTR



"WE HAD TO PROVIDE A STATUS REPORT EVEN BEFORE WE HAD A CONTRACT"

"I THINK THERE SHOULD BE MORE FLEXIBILITY IN REPORTING ESPECIALLY SINCE WE RECEIVE VERY LITTLE MONEY"

"IN SPITE OF EFFORTS BY THE MANAGEMENT TEAM, THE PSC HAS BEEN LACKLUSTRE WITH A FEW EXCEPTIONS, AND THE ACTORS HAVE CHANGED QUITE A BIT"

- STAKEHOLDER PERSPECTIVES FROM MTR INTERVIEWS

also observed evidence of budget re-programming based on changes in national circumstances and sound choices in alternatives (ecolabelling in Sri Lanka, for example) that are aligned with the SAICM Project's sustainability efforts. Delivery has been satisfactory in technical, programme and financial terms. There were recurring problems however, resulting from the incompatibility, a mismatch in expectations and changes to financial management and reporting systems used by UNEP and those of the Project's sub-contractors and even other UN agencies such as the WHO. The different formats, budget lines and reporting criteria could have benefitted from some upfront training and agreements from the outset, as these required periodic level-setting and led to time-consuming discussions that swallowed up efforts better placed elsewhere. These problems were aggravated by many stakeholders' unfamiliarity with the GEF and its implementation guidelines, the absence of a PEU and "caretaker" arrangements for much of the first year, as well as extended procurement delays in activating contracts which alone saddled the Project with a one-year delay. In light of COVID-19, the Project leveraged and made best use of virtual tools to get work done and the barrier to entry was quite low.

27. Monitoring and Reporting. The monitoring & evaluation plan in Table 4 of the ProDoc has been adequate and has allowed for monitoring of progress and results at output level. The Project's Results Framework has been the primary tool to track progress at

¹³ **Reflection from the EPA during final review cycle of the MTR final report:** The EPA agrees with the concern about the 40% unspent funds. As stated in the PSC in September and in our meeting with the consultant, EPA recommends encouraging UNEP to provide more direct hands-on management, including to ensure funds will be spent on priority actions most directly linked to meeting the project targets, e.g., Component 1 funds for national-level meetings to draft laws and funds to disseminate reformulation guidelines and engage vendors in SME reformulation.

the results level by the executing agency. While the Results Framework is mostly adequate, it requires revisiting for consistency and over ambitiousness following the MTR. It is noted that since the arrival of the PEU, it has correctly and satisfactorily monitored implementation and identified deficiencies and the sub-optimal rating is due to the accumulation of and persistence of issues during the Project's caretaker management phase. Furthermore, an overwhelming number of sub-contractors interviewed underscored the out-of-the-box thinking and adaptive management of the component leads in problem-solving the targets within the bounds and restrictions of the Project's Results Framework. Reporting cadence and templates have undergone incremental revisions and are of a high quality. Some partners do believe that reporting presents a high administrative burden that is not aligned with the dollar values of contracts. It is not recommended to pare down the reporting at this juncture however as it will cause unnecessary disruption and force partners once again to re-adapt at a time when energies should be focused elsewhere. Timely progress and status reports are provided to the PSC, which meets at least semi-annually as per best practice, although not all PSC members are equally engaged and active. The Project is actively monitoring risks on an ongoing basis adding to a register when new risks emerge. In spite of being designed under GEF-6, the SAICM project is complying with GEF-7 indicators 9.4¹⁴, 9.5¹⁵ and 11¹⁶. It is making progress on all, although core sub-indicators 9.4 and 9.5 do not map fully to the parameters being monitored by the Project; with sub-indicator 9.5 being particularly problematic. Per the 2021 PIR, progress core indicators is as follows: (i) core indicator 9.4 - 15 countries have passed lead paint legislation (Component 1) and 0 have set Sustainable Public Procurement requirements for low chemicals use (Component 2); core indicator 9.5 - 14 paint manufacturers have completed the paint reformulation demonstration projects and are able to produce lead-free paint (Component 1) and USEtox-based single-layer model updated and ready to be used for building materials and mouthing model for toys with 1 government trained on its use and Chinese regulations on chemicals concentrations allowed in toys and testing conducted and engagement started with toy companies (Component 2); and core indicator 11 - 90 events organized in 55 countries + 2 global events both exceeding the 170 participant threshold (Component 1), 270 individuals trained (Component 2) with gender representation of women consistently above the 30% mark and 800+ members in the communities of practice (Component 3), with gender representation at 50%+.

28. Sustainability. There were relatively high sustainability levels observed during the MTR and transition planning is already very much on the PEU and PSC's radar with exit strategies to be considered at the next PSC meeting. With 19 countries in the late stages of adopting lead paint laws, national governments appear committed to soundly manage chemicals and wastes in order to protect the health of their populations and the environment. Ownership of the Project was high in all the participating countries with respect to LiP but has proved to be slightly more challenging among governments and SMEs for CiP work due to the greenfield nature of the domain; nonetheless strong champions have emerged on this front too. Institutional capacity in most countries is robust enough to continue delivering project benefits beyond the lifetime of the Project,

¹⁴ Number of countries with legislation and policy implemented to control chemicals and waste.

¹⁵ Number of low-chemical/non-chemical systems implemented particularly in food production, manufacturing and cities.

¹⁶ Number of direct beneficiaries disaggregated by gender as co-benefit of GEF investment.

although a new business model for technical support will be needed. The Project's KM platform and CoPs offer the best chances of sustainability so long as these are transitioned into SAICM (or whatever permutation of the framework as part of the Beyond 2020 process). However, ensuring it becomes demand-driven rather than supply-driven will be a specific challenge to solve.

29. Preparation and Readiness. The Project held an Inception Workshop within the first three months of implementation - as mandated by the GEF - with a first PSC meeting assembled shortly thereafter. There was an adequate mapping of stakeholders and identification of the key actors with proper description of their roles and responsibilities in the ProDoc; the Stakeholder Engagement Plan was revisited during the inception phase. As noted above, signing of legal agreements with recipient stakeholders/funded partners/institutions etc., took much longer than initially expected and was a bottleneck to starting activities before 2019. There were high levels of preparedness insofar as institutional arrangements were built around existing networks and collaborative processes, facilitating the Project's insertion at the country level and ensuring coherence with ongoing initiatives and institutional priorities. These factors have raised the level of national ownership, improved the prospect of sustainability and upscaling, and encouraged institutional commitments as reflected in the level of co-financing.
30. Quality of Project Implementation and Execution. The Project's implementation approach and institutional arrangements were key contributing factors to project performance. The implementation strategy was well conceived and deviations thoroughly discussed prior to their adoption. There is a good relationship, cooperation and open lines of communication between the members of the wider execution team (PEU and component leads) and GEF Task Manager; reinforced by a regular meeting cadence that has served the Project well. Staffing of the SAICM project improved as work progressed and is now in line with the Project's implementation structure approved by the PSC at its first meeting. Stakeholder interviews universally recognized the good supervision and coordination work provided by UNEP and the SAICM Secretariat, through the PEU.
31. Stakeholders Participation and Cooperation. The Project's strategy and its ultimate success, hinges on a high degree of collaboration between members international MEAs and multi-sectoral / multi-stakeholder policy frameworks such as SAICM, international coordinating groups such as the IOMC and Lead Paint Alliance, the private sector and civil society. In the experience of the Review consultant, this model and level of collaboration entrenched in the Project's design is not only atypical but also unprecedented. Participation and involvement of the stakeholders in the work of the SAICM project was very satisfactory, which allowed the Project to meet most of the mid-term targets¹⁷. There were a number of examples of partners, even those not

¹⁷ **Reflection from the EPA during the final review cycle of the MTR final report:** As EPA stated in its interview with the consultant, the project would benefit from having continuity in a Lead Paint Component manager and for that manager to have the time and expertise to manage the project fully. When the project manager left, it was almost a year before a new nearly full-time project manager was assigned. Certain project management tasks fell to the partners initially. For future projects, this particular model of engaged partners assumes that they are willing and able to engage to the level they did in this project.

in receipt of GEF funds, rising to the occasion and demonstrating leadership. Reception of the KM platform and CoPs have been solid although there is room for improvement. A consistent thread which has emerged, is that engagement and contributions during PSC meetings could and should be better. Conversely, there have been difficulties engaging with and accessing industry in China at the scale necessary to achieve results, warranting some adaptive management going forward and revisiting end-of-project targets for toy manufacturers in particular.

32. Responsiveness to Human Rights and Gender Equity. While the aspect of human rights was not mentioned in the SAICM Project Document, the involvement of women and gender considerations in planning of activities and in thematic discussion on SDGs factored strongly and was highly satisfactory. While the management team is not consciously monitoring risks in the Safeguards Plan submitted at CEO approval, the impact of Safeguard Standard 6 and 9 respectively continue to be negligible.
33. Country Ownership and Driven-ness. The implementation model of the SAICM Project, which meant working through the national NCPCs, IPEN and Regional Centres, fostered a high degree of ownership and country driven-ness in the recipient countries. The Project benefited strongly from these organizations, many of whom enjoy strong government support and penetration, and are accustomed to providing assistance with SMEs.
34. Communication and Public Awareness. A number of communication tools have been produced that feed into a central KM platform (saicmknowledge.org), an institutional archive and for dissemination of scientific and policy knowledge resources amongst the SAICM stakeholders (government focal points, industry and non-governmental organisations representatives, other United Nations and international organisations, academia). More than 800 active members have registered in the four SAICM CoPs that were launched in July 2020 on HHPs, Chemicals in Products, Lead in Paint and Chemicals, and SDGs, where 25 online discussions have taken place so far. At country level, a number of awareness and training workshops related to the sound management of chemicals have been held, many linked to annual ILPPW events. The IISD is bringing heightened awareness to public on EPIs through regular stories and curated content. While the focus has been on outward communication, the Project can do better in keeping its stakeholders feeling connected to the Project by way of regular internal communication.

C. Summary of Emerging Lessons Learned

35. The MTR finds the following lessons generated from the review of the documents and consultations with the project stakeholders:
36. **Lesson 1:** Leveraging existing networks and having natural partners to carry work forward post-project is a critical element of sustainability.
37. **Lesson 2:** Engaging knowledgeable stakeholders with complimentary strengths and experience in communication and information strategy, as well as tried and tested

methods are essential components of Knowledge Management when standing up new platforms.

38. **Lesson 3:** Rolling up indicators at the objective level as opposed to developing unique indicators opens up room for error and misalignment. Monitoring progress at the results level rather than at output level is an approach that ensures success, and achievement of project goal and impact.
39. **Lesson 4:** It is important that a project's design and timeline reflects national constraints and the potential disruption caused by national elections and administrative procedures of economic and political unions.
40. **Lesson 5:** The inception period is very valuable – allow sufficient time. It helps to demystify the expectations of GEF projects, pool together necessary expertise to “right-size” the level of ambition¹⁸ and determine if guidance can be provided from GEF or the GEF Implementing Agency on how to manage a big project. More importantly, this is when the PEU must be established to enable projects to hit the ground running. All things considered, deep consultation and the right representation is essential to set projects on the right footing.
41. **Lesson 6:** Inclusivity and consultative project design can lead to very tangible and real co-financing commitments.
42. **Lesson 7:** Project “Champions” and “Change Agents” play a significant role in project success and furthermore, are instrumental to project replication and sustainability efforts. Strong leadership by UNEP is needed in implementing the Project at the component level. For example, only UNEP had the overview of all the budgets across all partners in Component 1, but did not always conduct strategic analyses about how best to focus efforts. This task sometimes fell onto partners with an incomplete end-to-end view of the budget and the Project.
43. **Lesson 8:** While GEF projects must be ambitious to achieve global environmental benefits, they need to balance and take into consideration the sphere of influence of the management teams that implement them so as not to set unrealistic expectations and targets. Meaningful engagement of partner experts during the project development and inception phase is important to help avoid the development of impractical targets.

D. Conclusions and Recommendations

44. The Review consultant concludes:

¹⁸ **Reflection from the EPA during the final review cycle of the MTR final report:** As stated in our interview with the evaluator, EPA believes that the design period would have benefited from more consultation with experts. We would encourage that these lessons learned (5 or 6) be written in a way that would suggest the inclusion of key experts in the inception period to develop the goals and structure of the project itself. That would have ensured more realistic project goals, for example (rather than 40 countries with laws, possibly only 10 with laws, but 30 countries drafting). Also, experts had suggested working with ECOWAS but did not recommend providing such a large budget, which could have been better spent elsewhere.

- Project activities successfully implemented as a result of the close cooperation and coordination of the executing and implementing partners with beneficiary stakeholders up to the MTR. Overall management and implementation of the Project was found to be successful and satisfactory to date with good prospects of successfully achieving the Project targets, but can be enhanced per the recommended actions noted in the Findings and Recommendation section of this report;
- Progress towards the availability of outcomes and outputs suggest the Project is on track to meeting its stated objective, and is generating the enabling conditions and mechanisms to sustain them.
- The Project has clearly demonstrated the difference that strong management and a solid team makes, as well as the benefits of frequent open communication to tackle challenges head-on;
- The GEF implementing and executing agency, as well as the many beneficiary stakeholders and partners observed to be involved in the Project, including the private sector, have been instrumental to its success. Many enablers and champions have risen to the occasion;
- The agile approach taken by the Project, on the KM platform in particular, is reflective of the seasoned management and has allowed for relevant information to be accessed relatively quickly while soliciting input on new functionality and making incremental refinements in parallel;
- From a governance perspective, while the composition and representation on the Project Steering Committee is sound, it could offer more value with more consistent engagement from all members and if it had the opportunity to dive directly into issues as opposed to sitting through status updates;
- Each component of the Project has the potential to be spun into an individual project that can also be developed and implemented independently. Continued technical support and funding is needed to consolidate institutional capacities for continuing the momentum on helping more countries pass LiP legislation¹⁹ and having the right backstopping model for the eventual implementation of supply chain tools;
- The Project has strong prospects for replication and upscaling, with the potential to provide major global environmental benefits and best practices to enhance sound chemicals management.

¹⁹ **Reflection from the EPA during the final review cycle of the MTR final report:** As discussed in the PSC meeting, enforcement of lead paint laws is an important critical next step to include in any possible future projects. In addition, based on questions received from governments about how to implement laws, the Alliance is building on its experience in helping to formulate laws to begin developing enforcement guidance for implementation of laws. It would be helpful for effectiveness of this project and sustainability of future projects, if the MTR could give a nod to this need for current and future work.

45. and recommends the following (Reference also made to table 14);

Design and Strategy

- I. Following the MTR, a new Results Framework should be adopted based on the recommendations and outcomes of the joint workshop during the review, with proposed adjustments to targets and indicators approved by the Steering Committee at its next meeting;
- II. Work on an exit strategy and transition plan for each of the goods and services developed under the SAICM project should be expedited. A dedicated agenda item should be tabled to work through the particulars at the next Steering Committee meeting.
- III. Stakeholder interviews and the online survey circulated during the MTR surfaced the near unanimous view that there is value in the Project presenting at ICCM5 when it is scheduled. Therefore, it is recommended that the SAICM project be extended, albeit with a smaller subset of motivated partners instrumental during the Project's critical transition phase, and with a more targeted scope of Knowledge Management and training of government and value chain actors on being able to piloting and use of guidance tools. An extension would serve the Project well to not only allow critical work envisaged in the design to be completed but also ensure that higher order results to accrue.
- IV. If the SAICM project is not extended beyond its operational closure in end-2022, a thorough communication and transfer of any results from this project with relevance to [Resolution IV/4](#) of the SAICM framework should be pursued with high priority. Surplus funds - from unspent travel costs or the Terminal Evaluation (TE) - should be used strategically to support sustainability of results and transitioning.

Governance

- V. The PSC ought to dive straight into discussing and resolving issues at its meetings as opposed to sitting through passive status updates. Also, a smaller subset of the PSC²⁰ should meet more frequently to work through substantive and technical issues and specifically help to operationalize the transition plan in parallel to implementation during the remainder of the Project. This "technical committee" ought to be purpose-built with sustainability and replicability in mind.
- VI. With concerns and implementation issues that plagued the Project at the outset now resolved, there is no longer a need for the GEF Task Manager to participate in monthly meetings with the management team; instead they can convene quarterly moving forward.

Financial Management and Planning

²⁰ While this is already happening organically, through the Lead Paint Component Global Team, where NCPC Serbia, WHO, USEPA & UNEP (PSC members also take part), discuss substantive and operational issues on the LiP work, it should be more explicit and focus on business continuity post-project.

- VII. The Project should undertake a thorough budget revision following the MTR in order to (i) reallocate unspent travel funds due to the COVID-19 pandemic to strategic priorities identified through the MTR; ii) reprogram services that were supposed to be provided to the Project (i.e., technology advisory support from MapX on the KM platform); and (iii) streamline the budget (i.e., consolidating budget lines) where possible to facilitate reporting among partners. It is also recommended that surplus funds also be used to translate technical guidelines and other communication and dissemination activities that are currently not slated for translation.

Component 1

- VIII. The Project needs to pay close attention to monitoring progress of the regional standard for the ECOWAS region, and double down on facilitating, providing additional support, or accelerating work where possible. With the potential of gaining legislative support among its 15 member countries, all of which do not currently have a lead paint law, the realization of Outcome 1 hinges on the success of this deliverable.

Component 2

- IX. The Project must double down on expediting the finalization of new guidance and tools for the, toys and electronics sector, to allow sufficient time for their piloting and to train a critical mass of government and value chain actors.

Component 3

- X. For near-term investments on the KM platform to be worthwhile in the time remaining, the KM platform must be embedded to fulfill the strategic objectives of the SAICM framework in the Beyond 2020 process. In addition to the current migration costs, the management team along with the SAICM Secretariat must consider an adequate funding envelope for ongoing support and enhancements, anchored to a resource mobilization strategy going forward. Furthermore, the SAICM Secretariat and management team should consider and explore the KM platform's potential to facilitate technical and scientific cooperation through a help-desk service, modeled after the United Nations Framework Convention on Climate Change (UNFCCC) Technology Mechanism's [Climate Technology Centre and Network \(CTCN\)](#) and the CBD's [Bio-Bridge Initiative](#).
- XI. A conscious effort and investments made to increase LMIC representation and participation in the KM platform. It is also recommended to increase the level of ambition of the targets under Component 3 to reflect the need to target LMICs in the time remaining. Moreover, to ensure longevity post-project it is recommended to ensure coordination with existing efforts on the content to be included/highlighted in the next permutation of the KM platform and deeper integration with relevant Conventions besides the inclusion of links pointing to their websites.

Stakeholder Engagement and Communications

- XII. Frequently scheduled (semi-annual), regimented, real-time updates on progress that are open to all stakeholders, including the PSC, should be recorded and posted on saicmknowledge.org.
- XIII. The Project should align on and clearly communicate the official close of operations as different documents such as the PIR and Internal Agreement (as well as GEF guidelines) are not consistent.
- XIV. The PEU should revisit the social safeguards risks identified during formulation using the new [Safeguard Risk Identification Form \(SRIF\)](#) and if warranted, include, as part of the eventual transition strategy, a social plan for the workers and workplaces that could be lost altogether as a result of the Project.
- XV. Per best practice, ensure that gender activities articulated in section A.4 of the Project Document are documented in an explicit gender action plan.
- XVI. The UNEP Chemicals and Health Branch should use its convening power together with the GEF Chemicals and Waste Focal Area at the GEF Secretariat, to ensure the tools, products and services created by the SAICM project penetrate the existing portfolio and are designed into future projects under GEF-8.
46. The table below presents the summary of the project ratings. While the Project has been rated Highly Satisfactory overall, there is no room for complacency. The Project must continue to build on the solid momentum it has established, as well as consolidate, promote, and expand chemicals management efforts on a global scale; and be cognizant that designing a project to be part of a much longer and wider process generates huge benefits for sustainability, and through the synergies developed provides the intervention with much greater effectiveness than that which can be achieved by stand-alone projects. More detail can be found in Section 4 of the MTR report.

CRITERION	RATING
A. Strategic Relevance	Highly Satisfactory
i. Alignment to UNEP's MTS, PoW and strategic priorities	HS
ii. Alignment to Donor/GEF/Partner strategic priorities	HS
iii. Relevance to regional, sub-regional and national issues and needs	S
iv. Complementarity with existing interventions	S
B. Effectiveness	Highly Satisfactory
i. Availability of Outputs	S
ii. Achievement of Project Outcomes	S
iii. Likelihood of Impact	HL
C. Financial Management	Highly Satisfactory
D. Efficiency	Satisfactory
E. Monitoring and Reporting	Satisfactory
i. Monitoring of Project Implementation	MS
ii. Project Reporting	S

Table 2: Summary of Project Ratings

CRITERION	RATING
F. Sustainability	Likely
G. Factors Affecting Project Performance and Cross-Cutting Issues	Highly Satisfactory
i. Preparation and Readiness	S
ii. Quality of Project Implementation and Execution	HS
iii. Stakeholder Participation and Cooperation	HS
iv. Responsiveness to Human Rights and Gender Equity	HS
v. Environmental and Social Safeguards	S
vi. Country Ownership and Driven-ness	HS
vii. Communication and Public Awareness	HS
Overall Project Rating	Highly Satisfactory

1. Introduction

1.1 Project Context and Overview

47. The UNEP-supported GEF-financed full-sized project “*Global Best Practices on Emerging Chemical Policy Issues of Concern under SAICM*” or SAICM project as it is known, was designed to accelerate and measure the adoption of national activities and value chain initiatives to address targeted EPIs towards the achievement of the SAICM goal²¹ and support early planning for chemicals management in the 2030 Agenda for Sustainable Development.
48. Through its inclusive approach, UNEP’s Economy Division and the SAICM Secretariat in particular, were uniquely positioned to take the reigns of the Project - as Implementing Agency (IA) and Executing Agency (EA) respectively - owing to their ability to work across sectors in a multi-stakeholder manner with active networks and stakeholder communities in place. The SAICM Overarching Policy Strategy, for example, encourages an integrated approach to managing chemicals, on an inter-ministerial or inter-institutional basis along with other actors, so that all concerned national departmental and stakeholder interests are represented and all relevant substantive areas are addressed.
49. The Project has global relevance by operationalizing provisions of the SAICM framework that encourages its members to adopt national policies for rational chemicals management. While other global contaminants such as Persistent Organic Pollutants (POPs) or mercury are regulated by Multilateral Environmental Agreements (MEAs), namely the Stockholm and Minamata Conventions respectively, a number of additional EPIs are only subject to voluntary, cooperative risk reduction actions by countries.
50. The SAICM GEF project focuses on two SAICM EPIs: Lead in Paint; and Chemicals in Products, which generate particular environmental and health challenges. The Project addresses the need for stronger knowledge management, information exchange and planning to ensure concerted and coordinated action across all EPIs.

1.2 Description of the Project

51. The Project’s stated objective is: “To accelerate adoption of national and value chain initiatives to control Emerging Policy Issues, and contribute to the 2020 SAICM goal and 2030 Agenda for Sustainable Development”.
52. In its totality and as noted in the Theory of Change, the effective delivery of the Project activities and its core objective is intended to contribute towards the achievement of SDG 3.9 on deaths/ illnesses and SDG 8.8 on occupational injuries through reduced

²¹ In Paragraph 23 of the 2002 Johannesburg Plan of Implementation, adopted at the World Summit on Sustainable Development, national governments identified that by 2020, “*that chemicals are used and produced in ways that lead to the minimization of significant adverse effects on human health and the environment*”.

user community exposure, as well as indirectly through SDG 6.3 on improved water quality through reduced toxic discharges and waste generation. As such, the upstream actions by governments and value chain actors to replace priority chemicals in supply chains and products will reduce worker and consumer exposure, and environmental releases during manufacture and at end of life. The above, contributes to the 2020 SAICM goal of ensuring that “chemicals are produced and used in ways that minimize significant adverse impacts on the environment and human health”.

53. The Project’s multi-level and integrated programme designed around three components will deliver six outputs to achieve three results-oriented outcomes:

Component 1: Promoting regulatory and voluntary action by government and industry to phase out lead in paint

This component will achieve the following outcome: Countries legislate and implement legislation to restrict the use of lead in paint (LiP, 40 countries)

Component 2: Lifecycle management of chemicals present in products

This component will achieve the following outcome: Governments and value chain actors in the building products, toys, and electronics sectors track and manage chemicals of concern (CoC) in their products

Component 3: Knowledge management and stakeholder engagement

This component will achieve the following outcome: A broad group of SAICM stakeholders access information and participate in communities of practice for peer-to-peer learning exchanges

Monitoring & Evaluation

While not a formal component per se, the Project is underpinned by the following cross-cutting M&E deliverables:

- 4.1 Quarterly financial reports and annual progress reports monitoring status of project execution
- 4.2 Midterm and Terminal evaluations of project impacts shared with SAICM stakeholders

54. At a more granular level for **Component 1**, the outcome is for 40 countries to regulate to establish legal limits to lead paint; and for at least 50²² SME paint manufacturers in eight countries to phase out lead from their production processes. Through nationally focused interventions (Output 1.1), project activities will work with SMEs to demonstrate the replacement of lead paint to non-lead alternatives leveraging technical guidelines on paint reformulation, with experiences being shared across subregions. Through a globally coordinated approach with governments and regional standard setting organizations (Output 1.2) the Project will accelerate the adoption of legal limits to lead in paint.

²² This target was revisited as part of the MTR and in consultation with the PEU and component leads, since it not aligned with the proposed end-of-project target at the outcome level. See assessment of the Project’s Results Framework.

55. At a more granular level for **Component 2**, the Project is tasked with accelerating the adoption of measures by governments and value chains to track and control chemicals in supply chains for building products, electronics and toys. It will address the three barriers identified earlier, namely: creating demand-led and market-based incentives for supply chains to act via public procurement and sustainable finance measures; developing quantitative life cycle assessment tools to compare chemical alternatives and avoid regrettable substitutions; and enhancing the ambition of and compliance with regulatory requirements on CoC. The component is structured in two outputs: one on development of global level guidance and tools (Output 2.1) and a second on roll out of these in pilot projects and demonstration to companies in the three sectors (Output 2.2).
56. At a more granular level for **Component 3**, the impetus is for countries and other stakeholders to access up to date information produced by the Project and other stakeholders on the EPIs, and actively contribute to communities of practice for peer-to-peer learning exchanges, to support decision making and development of new initiatives towards the 2020 SAICM goal and in line with the 2030 Agenda. The Project addresses barriers identified by supporting stakeholders to tell compelling stories and to present their information in the most impactful way (Output 3.1) and providing a single point of reference for this material (Output 3.2).
57. The Project is being implemented in over 40 countries over a four-year time horizon, originally aiming at presenting early project results at ICCM5, which was subsequently postponed along with key intercessional meetings due to the global COVID-19 pandemic.

1.3 Project Partners and Stakeholders

58. Chemical management systems are by definition inter-institutional, multi-sectoral and interdisciplinary. They require involvement of public and private parties that range from line ministries, universities and research institutions to the private sector and ultimately, the consumers. As such, effective stakeholder engagement is critical to building broad country ownership and accountability, while building lasting partnerships is an important measure of the sustainability of these types of projects.
59. An updated Policy on Stakeholder Engagement ([GEF/C.55/Inf.08](#)) came into effect on July 1, 2018, which introduced the following net new requirements:
- More specific, mandatory documentation requirements across the project cycle, including the requirement for Agencies to present a stakeholder engagement plan or equivalent at CEO Endorsement/Approval;
 - Program-level monitoring and reporting on stakeholder engagement by Agencies, and portfolio-level monitoring and reporting by the Secretariat.
60. This Policy also notes that the implementing Agency should - in addition to overseeing implementation of the Stakeholder Engagement Plan - include information on progress, challenges and outcomes in their annual project implementation reports as well as mid-term and terminal evaluations.

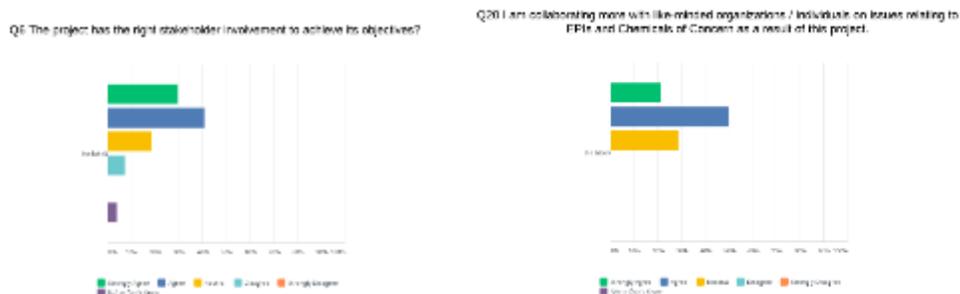
61. During its formulation and design, a thorough stakeholder analysis was carried out, including extensive baselining activities with a range of prospective partners and stakeholders on each component. The mapping of stakeholders in the Project Document is considered satisfactory and the major stakeholders, governmental as well as private sector players and NGOs have been identified, with their respective roles and responsibilities, and influence to the project also described satisfactorily.

"I DID NOT THINK THAT THE PROJECT WOULD BE SUCCESSFUL ON THE SME FRONT, BUT THANKS TO THE LEADERSHIP OF CHAMPIONS WHICH HAVE EMERGED, SUCH AS THE SERBIAN NCPC AND UNEPA, THIS HAS BROUGHT BELIEVABILITY TO THE PROJECT AND HAS ALSO BROUGHT KEY SUPPLIERS OF ALTERNATIVE ADDITIVES ONBOARD"

- STAKEHOLDER PERSPECTIVE FROM MTR INTERVIEW

62. A total of 70% of survey respondents believe that the SAICM has the right cross-section and involvement of stakeholders, with only 7% disagreeing. Perhaps more telling of the value-added generated, over 70% of respondents feel they are collaborating more with like-minded organizations on issues related to EPIs and CoC as a result of the Project.

Figure 1. Stakeholder Sentiments on Stakeholder Engagement and Collaboration



63. In addition to the private sector entities highlighted during the Project’s design, such as Clariant and BASF Corporation, it identified and engaged with 35 SMEs during implementation as part of the LiP component. The World Coating Council was also targeted during implementation. Through a call for proposals under Component 2, additional organizations, neither mentioned in the ProDoc nor discussed during the Project’s inception phase, have come onboard, such as Bioregional, El Bosque, ICLEI and the World Resources Forum.

"THE SAICM PROJECT IS VERY MUCH A MULTI-STAKEHOLDER PROJECT WITH OVER 25 IMPLEMENTING PARTNERS/ORGANIZATIONS ENGAGED IN THE EXECUTION OF THE PROJECT ACTIVITIES ACROSS ITS THREE COMPONENTS"

- FROM THE 2021 PIR

64. Component 3 on Knowledge Management is considered the main conduit and accelerator of stakeholder engagement. Considerable progress has been made on collaboration and stakeholder engagement by providing a platform for knowledge exchanges. These efforts include the establishment of four CoPs, with the total membership tally across all CoPs at more than 800 members since launching in mid-2020. Targeted efforts have been undertaken to engage underrepresented sectors within the SAICM process, for example the scientific community. Another vehicle for stakeholder engagement and drumming interest in LiP legislation has been successful annual ILPPW events.

65. While the PEU, component leads and dedicated stakeholder engagement consultants all actively targeted complimentary stakeholders and nurtured new partnerships, other entities mentioned in the Project Document have dropped off altogether during implementation. One such example is MapX, which was envisaged to be a technology advisory provider on the role of geospatial data on the Project's KM platform. At the time of design, MapX was generating a lot of buzz on its potential in the sustainable management of natural resources, and had evolved from an initial focus on extractive resource to an online geospatial visualization tool - with the [backing of UNEP's previous administration and touted by a number of MEAs](#) - of different resource types and themes, based on geo-references datasets. Interest in MapX has since waned and its relevance to the Project reassessed.

66. The table below highlights the evolving role of stakeholders in the Project, with new partners noted with an "*" asterisk.

Table 3: Changes in Stakeholder Engagement at MTR

Stakeholder	Role in Project Design and Execution (per ProDoc)	Component/ Output	MTR Assessment on any Deviations and Changes in Stakeholder Roles
Partners highlighted in the Project Document			
UNEP Chemicals and Waste Unit of the Chemicals Health Branch	<ul style="list-style-type: none"> Implementing Agency coordinated the development and design of the project, and consult with stakeholders; During implementation the IA will be responsible for implementing the project, and overseeing the Executing Agency. 	All	No major deviations found. UNEP Task Manager has been playing a very hands-on role to date, and participating in monthly / quarterly meetings alongside the PEU and component leads, as well as participating in PSC meetings.
SAICM Secretariat	<ul style="list-style-type: none"> Executing Agency cooperated with UNEP on the design and development of the project, working in partnership with the IA to consult executing partners and develop activities; During implementation the EA will be responsible for execution of the project; timely and quality delivery by partners; reporting and coordination. It plays a key executing role on Component 3 of the project. 	All	No major deviations found. Some misunderstandings and misalignment with the GEF Chemicals and Waste Unit at the outset of the Project, owing to different interpretations of the roles and responsibilities in the Internal Agreement.
UNEP, Knowledge and Risk Unit	<ul style="list-style-type: none"> During the design phase UNEP CHB attended LP an CiP PPG workshops 	Both Compon	Had to absorb "caretaker management" duties in the absence of a PEU until end of 2019.

Table 3: Changes in Stakeholder Engagement at MTR

Stakeholder	Role in Project Design and Execution (per ProDoc)	Component/ Output	MTR Assessment on any Deviations and Changes in Stakeholder Roles
of the Chemicals and Health Branch	<ul style="list-style-type: none"> and drove project design for Components 1 and 2; In addition to being the Project's IA, CHB will be a key executing partner for both technical components, providing both technical support and responsible for ensuring effective communication and convening partners for participatory management. 	Components 1 and 2	
UNEP Resources and Markets Branch	<ul style="list-style-type: none"> During the design phase, UNEP RMB attended CiP PPG workshop and drove project design for Component 2; UNEP RMB is a key executing partner for the CiP delivering technical activities on USEtox® and SPP, and ensuring coordination of project activities in Colombia and Sri Lanka. 	Component 2	No major deviations found.
WHO	<ul style="list-style-type: none"> The WHO jointly leads the Lead Paint Alliance and during the PPG formulation phase it has driven the project design including participation at the initial workshop and regular coordination calls. The WHO was consulted for the knowledge management component as well; The WHO is a key executing partner on LiP activities, notably supporting countries where Ministries of Health will be leading the national process to develop legislation and providing health advocacy where needed; The WHO is also expected to contribute health content for knowledge management and lead discussion forums including technical/ thematic papers on specific health topics and infographics/ animations. 	Components 1 and 3	No major deviations found. Much of the WHO's work was front-loaded and undertaken early in the Project's lifecycle; therefore, minimal impacts from COVID-19.
IPEN	<ul style="list-style-type: none"> IPEN is a member of the Lead Paint Alliance and has driven the project design process during the PPG, including participation at the initial workshop and regular coordination calls. It was also consulted upon for the knowledge management component; IPEN is a key executing partner on LiP activities, notably supporting countries with lead paint manufacture where it will promote industry participation. Furthermore, IPEN contributes content 	Component 1 and 3	No major deviations found.

Table 3: Changes in Stakeholder Engagement at MTR

Stakeholder	Role in Project Design and Execution (per ProDoc)	Component/Output	MTR Assessment on any Deviations and Changes in Stakeholder Roles
US Environment Protection Agency (USEPA)	for knowledge management and lead discussion forums including technical/thematic papers on specific topics in particular for gender related issues.		
	<ul style="list-style-type: none"> • The USEPA is the Chair of the Lead Paint Alliance and has driven the project design process during the PPG, including participation at the initial workshop, regular coordination calls, and during the implementation phase; • It is a key executing partner on LiP activities, advising the partners on implementation issues and providing support with countries through its own programme of activities on LiP. • The USEPA plays a leadership role in legal reviews and comments on draft laws provided by project countries. 	Component 1	While the USEPA's contribution is completely in-kind, it has emerged as one of the primary champions of the Project. It is also very much active in the Project's Steering Committee.
NCPCC China	<ul style="list-style-type: none"> • Attended PPG workshop on lead paint and shared national experiences; • Will deliver project activities on LP demonstrations of BAT/BEP for phasing out lead paint production in SMEs. 	Component 1	No major deviations found.
BCRC China	<ul style="list-style-type: none"> • Was consulted during the PPG and provided country baseline and proposal for Component 2; • Will deliver project activities on the toys sector in China including testing and input to the USEtox[®] model for toys and training of SMEs on national regulations on toy safety. 	Component 2	As part of its CiP work, BCRC China was asked to extend detection for 28 additional chemicals in toys, which increased the costs, albeit managed and absorbed within the existing budget.
UNEP Finance Initiative	<ul style="list-style-type: none"> • UNEP FI was consulted during the PPG and provided country baseline and proposal for Component 2; • UNEP FI is expected to deliver project activities on the building sector in Sri Lanka including promoting green buildings in the finance and mortgages sector. 	Component 2	Too early to assess. The MTR did not surface any explicit role via consultation with the NCPCC in Sri Lanka, as activities are at preliminary stages of maturity. As documented in the latest Q1 2021 progress report, the UNEP Environment Finance Initiative's training on Environmental and Social Risk Analysis has been adapted. Furthermore, a local consultant will be required to undertake market research in support of activity 2.2.4.
ICCM5 Bureau	<ul style="list-style-type: none"> • Was consulted upon at their meetings held during the PPG phase; 	All components	No role in the MTR.

Table 3: Changes in Stakeholder Engagement at MTR

Stakeholder	Role in Project Design and Execution (per ProDoc)	Component/Output	MTR Assessment on any Deviations and Changes in Stakeholder Roles
ABA ROLI	<ul style="list-style-type: none"> Is informed on project development and to provide guidance on implementation in moving forward. 		
	<ul style="list-style-type: none"> ABA-ROLI is a new partner for the Lead Paint Alliance and has driven the project design process during the PPG, including participation at the initial workshop and regular coordination calls; ABA-ROLI is a key executing partner on LiP activities, notably working with EPA and other partners to provide legal assistance and support to countries in reviewing legal systems and drafting legislation based on the Model Law. 	Component 1	In the first half of the Project, ABA-ROLI was not able to dive into concrete drafting and had to undertake a lot more awareness raising than originally envisaged. It took a while for the requisite spark to generate momentum as many government actors had never really known this area of international law.
Green Electronics Council	<ul style="list-style-type: none"> Was consulted during the PPG and provided sector baseline and proposal for Component 2; Will deliver their programme of co-financed activities in close collaboration with the project and share approaches and materials on ecolabels and certification with the Output 2.2 on electronics 	Component 2	The Green Electronics Council (GEC) is not involved in the Project. Instead, the WRF has been hired as a contractor (technical partner) to develop the electronics eco-innovation global supplement. There were no plans to engage GEC as a contractor. GEC has been involved in the work of Output 2.2 through periodic updates from UNEP on the progress of the project. The designated component lead keeps them informed. However, there has not been any co-financing reported yet nor substantive implications.
IISD	<ul style="list-style-type: none"> Was consulted, through email and phone calls, during the design stage for the knowledge management component; IISD is expected to develop content for the knowledge management including technical/thematic papers on specific topics, in doing so creating linkages to the IISD SDG Knowledge Hub and its communities of practice. 	Component 3	Role has been consistent and in line with expectations at the outset. IISD's main contribution has been writing stories to bring awareness to public to share information related to emerging policy issues, especially the lead in paint and the chemicals in products issues. If the project is extended, additional support may be warranted to document more stories as contract scope is close to being fulfilled. As a value-added, IISD provided the SAICM project with the online template to be adapted for the KM platform.
OECD, UNITAR, FAO, IOMC	<ul style="list-style-type: none"> Were consulted upon for the knowledge management component, including through email and phone calls and regular interaction with the IOMC; 	Component 3	UNITAR is undertaking electronics lifecycle- assessment work for Central and Eastern Europe (CEE) in the context of Component 2 and has subcontracted the Fraunhofer Institute

Table 3: Changes in Stakeholder Engagement at MTR

Stakeholder	Role in Project Design and Execution (per ProDoc)	Component/ Output	MTR Assessment on any Deviations and Changes in Stakeholder Roles
NCPCs Jordan, Ecuador, Peru, China; SRADev Nigeria and BaliFokus Indonesia NCPC Colombia NCPC Serbia NCPC Sri Lanka and Green Building Council Sri Lanka	<ul style="list-style-type: none"> Will deliver their programme of co-finance activities in close collaboration with the project, sharing knowledge content to the repository, developing thematic papers, contributing to the discussion platforms and linking related databases. 		for Reliability and Micro-integration. FAO is no longer playing the substantive role on HPPs originally envisaged in the original design, although it is active in and contributing to this CoP.
	<ul style="list-style-type: none"> Attended PPG workshop on lead paint and shared national experiences; Will deliver project activities on LiP demonstrations of BAT/BEP for phasing out lead in paint production in SMEs. 	Component 1	No major deviations found.
	<ul style="list-style-type: none"> Attended PPG workshops on LiP and CiP and shared national experiences on both lead in paint and sustainable public procurement; NCPC Colombia will deliver project activities in Colombia on both LiP and CiP, including working with SMEs to phase out lead in paint production and with government to implement draft national SPP guidelines for electronics. 	Components 1 and 2.	Recent insolvency will impact role going forward and plan to complete Project activities on both LiP and CiP.
	<ul style="list-style-type: none"> Attended PPG workshop on lead in paint, shared experiences and provided expert input into project design; Will provide international technical expertise on BAT/BEP and coordinate work between NCPCs, ensuring consistency of approach, timeliness, and South-South cooperation, so that NCPCs can learn from each other. It is expected that NCPC Serbia will also provide support direct to SMEs on specific reformulation challenges. 	Component 1	Consultations have revealed a consensus that NCPC Serbia has emerged as a champion of the project and one of its main success factors. It has also connected the SMEs with alternative pigment suppliers.
	<ul style="list-style-type: none"> Consulted during the PPG and provided country baseline and proposal for Component 2; Will deliver activities on the building sector including testing and input to the USEtox® model and training of SMEs and suppliers to SPP processes. 	Component 2	No major deviations found. However, a new activity on eco-labelling has been proposed to replace the originally planned activity on Sustainable Public Procurement (SPP). This request has been discussed with and approved by the Project's national steering committee in Sri Lanka (which includes members of the government), as the government has not yet adopted the overarching SPP policy in the country and is thus not ready to implement

Table 3: Changes in Stakeholder Engagement at MTR

Stakeholder	Role in Project Design and Execution (per ProDoc)	Component/Output	MTR Assessment on any Deviations and Changes in Stakeholder Roles
MapX, Global Green Knowledge Platform, SCP Clearing House, BRS Conventions	<ul style="list-style-type: none"> • Were consulted during the PPG and provided guidance and technical input into the design of the KM platform architecture and concept, including the end-user focus in conceptualizing any KM system. • Per the design the Project will develop and issue a call for proposals/ tender for the development of the software for the KM platform. 	Component 3	<p>technical specifications on the public purchase of building products yet.</p> <p>Global Green Knowledge Platform playing an active role in providing guidance to the Project on the KM platform.</p> <p>MapX is no longer playing any role whatsoever.</p> <p>Too premature to advise on changes to SCP Clearing House role as activities have not started as per 2021 Q1 progress report.</p> <p>Minimal linkages found to the BRS Conventions other than links found on saicmknowledge.org.</p>
University of Cape Town	<ul style="list-style-type: none"> • Was consulted upon for the knowledge management component, including through email and phone calls; • As per co-financing commitments, University of Cape Town will contribute content for the knowledge management including the discussion platforms and technical/thematic papers on specific topics, in particular for pesticides and agriculture. 	Component 3	No deviation found.
ISC3	<ul style="list-style-type: none"> • Was consulted during the PPG for the knowledge management component, including through email and phone calls; • During implementation is expected to deliver their programme of co-finance activities in close collaboration with the Project, sharing knowledge content to the repository, contributing to the discussion platforms, as well as linking related databases and common interest areas. 	Component 3	While ISC3 did not come up during consultations, they are fully involved in the CoP work. ISC3 are part of the Multi-Stakeholder Coordination Group for the CoP on Chemicals in Products & the CoP on Chemicals and SDGS. As such, they have led some online sessions, supported dissemination for further registrations of members and provided inputs to the strategic planning of the CoPs. Furthermore, they also have provided several publications and resources to be posted in the KM platform and were consulted when preparing the Gender Report on EPIs and in its dissemination

Table 3: Changes in Stakeholder Engagement at MTR

Stakeholder	Role in Project Design and Execution (per ProDoc)	Component/Output	MTR Assessment on any Deviations and Changes in Stakeholder Roles
The Global Alliance for Buildings and Construction	N/A	N/A	The Global Alliance for Buildings and Construction (GABC) did not come up in any of the consultations. In fact, Ecoregional has been championing green building materials and advising on efforts in Sri Lanka.
ECOWAS	The ECOWAS Commission was mandated by its Member States at the 16th African Ministerial Conference on the Environment (AMCEN) meeting held in 2017 to develop such a standard on lead paint. Including as an activity in Component 1 to facilitate development and adoption of a regional standard.	Component 1	No major deviations noted.
New partners brought onboard during implementation			
Bioregional*	N/A	Component 2	Brought on in mid-2020. Tasked with writing the eco innovation manual supplements on building materials for the Project. Also providing subject matter expertise and training to Sri Lanka and working closely with NCPC Serbia.
Ei Bosque*	N/A	Component 2	Tasked with developing a regional electronics study and circularity roadmap in the Latin America and the Caribbean (LAC) Region. Has delivered an interim stakeholder mapping in preparation for the forthcoming study, posted on saicmknowledge.org in July 2021. The final study will aim to propose recommendations for action and a roadmap for the electronics sector in LAC Region, with a specific focus on chemicals of concern in electronic products. It is scheduled for late 2021.
ICLEI*	N/A	Component 2	Engaged by the Project through a call for proposals in 2020 to work on a global guidance on how to tackle chemicals of concern in electronic products specifically using Colombia as the pilot, working with the NCPC on sustainable public procurement. Has also developed draft technical guidelines on the role that sustainable procurement can play in managing chemicals of concern in e-products procured within the public sector, during their entire lifecycle, with finalization scheduled by end of 2021.

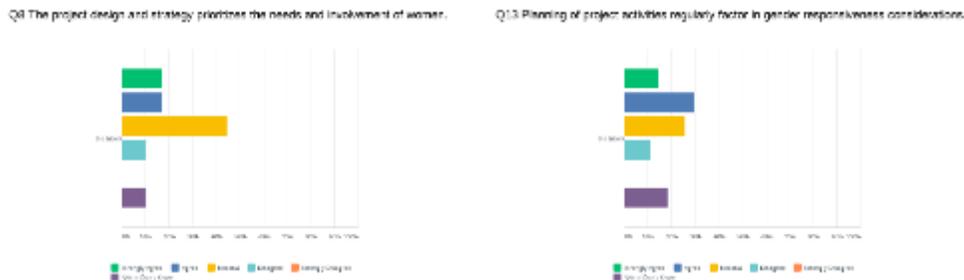
Table 3: Changes in Stakeholder Engagement at MTR

Stakeholder	Role in Project Design and Execution (per ProDoc)	Component/Output	MTR Assessment on any Deviations and Changes in Stakeholder Roles
WRForum*	N/A	Component 2	WRF has been engaged by the Project to develop the electronics eco-innovation global supplement.

67. Recognizing the linkages to the 2030 Agenda and ambition towards greater gender responsiveness within the UN system, the ProDoc was purpose-built to be attuned to gender’s cross-cutting dimension, which is reflected across all three components. The Project’s design explicitly acknowledges differences in the impact pathways on women (and other vulnerable groups such as children), as well as exposure differences from a health perspective and gender inequalities related to decision-making around the management of chemicals and waste themselves. It is interesting to note this finding by the Review consultant was not shared by the questionnaire results as 10% of respondents felt the design did not sufficiently prioritize the needs and involvement of women, but reassuringly a majority of respondents believe the planning of activities has indeed factored in gender considerations during the Project’s implementation.

68. Gender has resonated in the Project’s execution through active monitoring of gender disaggregated indicators, a commissioned report by IPEN to provide concrete steps that can be taken to safeguard the health of women and empower women in decision-making and in their roles as agents of change in sound chemicals management, and finally, a discussion on “gender and sound management of chemicals and waste: Gender and the SAICM Emerging Policy Issues”, which took place on 26 August 2020 as part of the CoP on Chemicals and SDGs. More details on gender are provided in Section(s) [4.6](#) and [4.8.4](#).

Figure 2. Stakeholder Sentiments on the Prioritization of Gender in the Project’s Design



1.4 Implementation Arrangements and Governance

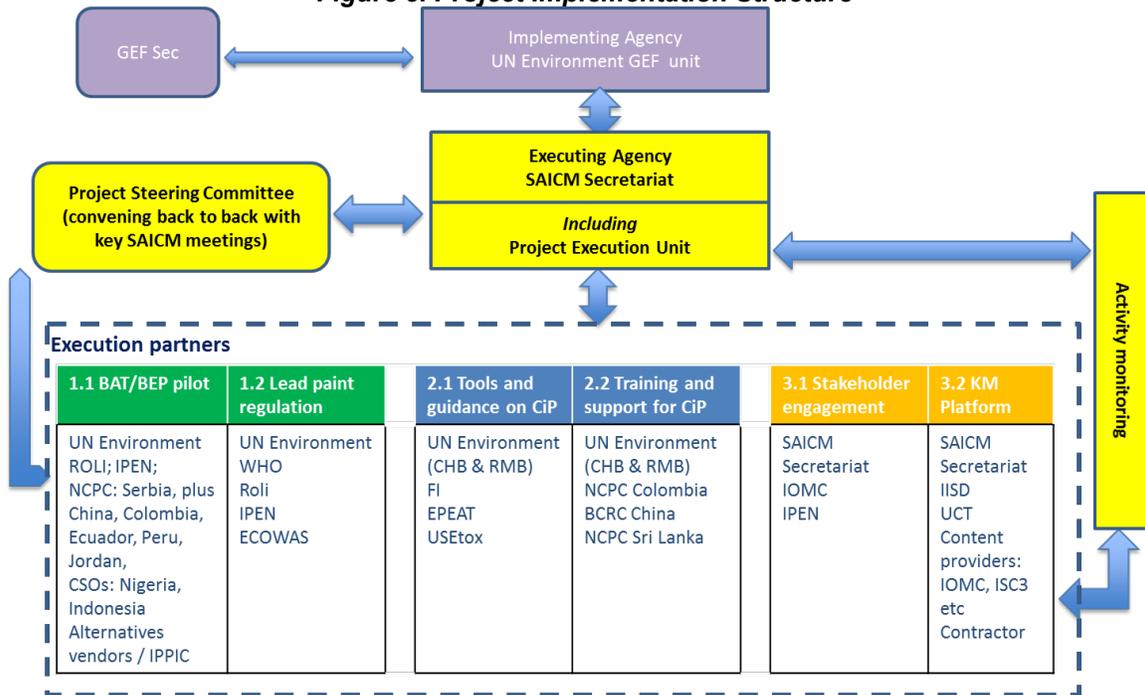
69. The Implementing Agency for the Project is UNEP’s Chemicals and Waste Unit Economy Division. In this capacity, UNEP has overall responsibility for project implementation, oversight and co-ordination. The Executing Agency is the SAICM Secretariat²³ and, through delegation of functions, the housing of the Project Execution

²³ Consultations with the SAICM Coordinator have surfaced that the Secretariat is quite lean, with a total of twelve resources, comprised of: one coordinator, five P- and G-level staff, four interns and two consultants.

Office. The PEU is subsequently responsible for the coordination and management of the project, its day-to-day operations and monitoring compliance with work plans as a basis for the execution of the Project. The PEU team is compact, comprised of a full-time Project Manager / Knowledge Management Officer and a full-time Administrative and Financial Officer. The Project Manager / Knowledge Management Officer is the day-to-day implementer and coordinator who is responsible for the implementation and reporting of activities for delivery of project outputs, who liaises with and works collaboratively with the respective component teams to ensure activities are implemented on time, and who monitors progress. For all intents and purposes they are the component lead for the KM stream and has the overall responsibility for executing the EA on behalf of UNEP.

70. The PEU is flanked by a wider implementation team of component leads and support consultants: 1 component lead and 1 consultant supporting component 1 efforts, as well as a component lead and an additional two resources (including a consultant) supporting component 2 efforts, and finally, a designated stakeholder engagement consultant.
71. Currently at peak operations and firing on all cylinders, the Project has involved a cross-section of 25 key partners, in line with the multi-institutional and the multi-sector dynamics to reflect the needs of chemical management on a global scale.
72. In line with the Project Document, a Project Steering Committee composed of representatives from the IA, EA, UNEP's CHB and RMB, WHO, the Chair of the IOMC, NCPC Serbia, USEPA and relevant national government representatives nominated by the SAICM Bureau, was constituted. In practice, the PSC has met semi-annually, is currently Chaired by NCPC Serbia and provides operational guidance on the implementation of the SAICM project and advice on other matters as required, including proposals for the reallocation of funds. At country level, national Steering Committees have emerged to support the implementation of country pilots. These governance bodies function independently from the main PSC, although issues flow upwards and are filtered through quarterly reporting with subcontractors.
73. At the first meeting of the PSC on 26 March 2019, the governance structure articulated in the Project Document (represented in Figure 3 below) was formally adopted without amendments and has remained intact since.

Figure 3. Project Implementation Structure

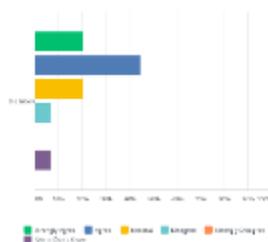


74. It has been noted that the GEF Task Manager is quite active in the Project, more so than others the Review consultant has evaluated. In addition to their participation at PSC meetings, they are essentially functioning as an extension to the core management team. This level of engagement while warranted during times of chronic underperformance and crisis, is currently not needed.

75. The online questionnaire revealed that the vast majority (over 65%) of respondents believed the Project has the right governance and support structures in place to achieve its core objectives, with only 6% in disagreement with this statement. Open-ended feedback on the Project’s weaknesses noted the following criticism on governance (i) existing of governmental bodies in the Steering Committee; (ii) absence of a UNEP project manager; and (iii) complex multi-layer management structure.

Figure 4. Stakeholder Feedback on Project Governance

Q5: The project has the right level of governance and support structure to achieve its objectives given its scale and complexity.



1.5 Project Financing

76. The full project cycle was divided between a Project Preparatory Grant phase²⁴ (2016-2017), which was followed by the approval of the FSP in 2018 that commenced implementation on 13 November of the same year.
77. The total cost of the Project being executed by the SAICM Secretariat is USD 29,502,903.00, of which USD 8,190,000.00 is GEF financing and the balance is co-financed as described in the table below.

Table 4: Project Financing

Sources of Financing:	At CEO Endorsement US\$	At Midterm Review USD	% Mobilized at MTR
(1) GEF financing:	8,190,000.00	3,288,467.00	40.15%
(2) GEF Agency:	5,501,955.00		
(3) Government:	898,060.00		
(4) CSOs:	5,740,500.00		
(5) Private Sector:	108,000.00		
(6) Other:	9,064,388.00		
(7) Total co-financing [2+3+4+5+6]:	21,312,903.00	13,959,031.00	65.50%
TOTAL PROJECT COSTS [1+7]:	29,502,903.00	29,502,903.00	58.46%

1.6 Changes During Implementation

1.6.1 Changes to Design

78. At formulation, the full-sized SAICM project was designed and submitted as a package together with a medium-sized project (MSP) titled “Global best practices on emerging policy issues of concern under SAICM (Highly Hazardous Pesticides, Environmentally Persistent Pharmaceutical Products [EPPPs] and Endocrine Disrupting Chemicals [EDCs])”. Together, these projects were intended to address the SAICM priority issues identified at ICCM4 and included in the GEF6 strategy. Unfortunately, the latter has yet to make lift-off and while there has been minimal impact to the SAICM project itself, some of the cost sharing measures may present challenges, should the MSP start implementation.
79. As noted above, the involvement and value-added of MapX with respect to capabilities to deliver geospatial visualization of different resource types and themes, was reconsidered and ultimately removed from the results hierarchy.
80. In Sri Lanka, a new activity on eco-labelling was proposed by the PEU and subsequently approved by the GEF Task Manager in August 2021, to replace the originally planned activity on Sustainable Public Procurement. This request was discussed with and approved by the project national steering committee in Sri Lanka

²⁴ USD 200,000.00 was allocated to the project formulation PPG phase.

(which includes members of the government), as the government has not yet adopted the overarching SPP policy in the country and is thus not ready to implement technical specifications on the public purchase of building products yet. It is expected that the proposed alternative activity will result in the development of criteria with a specific focus on CoC (for the priority products identified under the project) under the eco-label that is already run by the NCPCL Sri Lanka (the NCPCL is also member of the [Global Ecolabelling Network](#)). The technical specifications that will shape the criteria of the eco-label type I can then inform future sustainable public procurement policies in Sri Lanka, as was also discussed with the government.

1.6.2 Changes to Budget and Timelines

81. There have been no major changes in budget or timelines, aside from several proposals on the reallocation of funds that were within acceptable thresholds to be either discussed at the level of the PSC or discussed with other scope changes discussed internally with the core management team, including the GEF Task Manager. The project management team has also demonstrated pragmatism, flexibility and adaptive management in the implementation approach, in involving new partners where these would add value and to respond to scope challenges such as the decision to focus support on establishing an eco-labelling scheme in Sri Lanka when SPP guidelines for the building sector proved to be untenable. Following the MTR, a formal revision will likely be required to re-program surplus funds and work through the Project's transition strategically.
82. In spite of being a 48-month (4 year) duration, both the 2021 PIR and MTR ToRs note a planned closure date 31 March 2023. The MTR consultant has not seen any formal documentation supporting an extension to the Project timeline and the minutes from the 5th meeting of the Project Steering Committee held 28 January 2021 still references a 48-month implementation timeline. The Internal Agreement however, notes a planned completion date of 30th September 2022. Amid this confusion the Project should establish and communicate the formal operational closure, recognizing that financial closure can take up to a year thereafter.

1.6.3 External Changes since Project Outset

83. The following changes have occurred since the Project's outset:
- The role anticipated to be played by MapX is neither relevant nor is there currently data that can support geocoordinate mapping as initially budgeted;
 - As a result of initial delays, efforts to support the substitution of LiP in Tunisia (covered entirely through co-financing) and following a similar approach for industrial anti-corrosive paints within the [SwitchMed Programme](#) under the Barcelona Convention, resulted in pilot testing no longer being relevant or attributable to Project efforts;
 - Elections have forced a change in Project strategy, i.e., government pre-requisites for approval of legislation (technical guidelines now need to be approved first) in Ecuador, and SPP guidelines have been held up by the dismantling of the previous government's policy approval agency in Sri Lanka. Please see section 4.4 for more information and details pertaining to the issue of Sri Lanka;

- The main demonstration pilot partner in the LAC region, NCPC Colombia, has folded due to insolvency and mitigation measures are being considered.

2. Mid-Term Review Scope, Objectives and Methodology

2.1 Subject and Scope of the Review

85. The MTR was conducted in line with [UNEP Evaluation Policy](#) and UNEP's [Evaluation Manual](#), as well as Guidelines for GEF Agencies in Conducting Mid-Term Reviews. New requirements in the recently-updated [GEF Evaluation Policy](#) were also considered and as encouraged by the GEF, [OECD DAC guidelines](#) have also been leveraged to support a comprehensive, thoughtful, and utilization-focused evaluation.
86. The MTR of the SAICM project was conducted slightly after the halfway point of implementation, due to a confluence of factors including (i) the Project's lengthy start-up and inception phase; (ii) extended procurement delays and the activation of more than 20 Small-Scale Funding Agreements and consultancies, which were further aggravated by a transition to a new grant management module in Inspira - that few people knew how to use - at the end of 2018; and (iii) the introduction of a Project Execution Unit (PEU) which only became fully staffed in late 2019.
87. The MTR was intended to analyze whether project implementation is on track, identify the main challenges and to provide recommendations on how to address them. It assesses the relevance, efficiency and effectiveness of the project, as well as the likelihood of it achieving its intended outcomes, impacts and sustainability of impacts.
88. The review covers the implementation of the SAICM project between the period of its official inception of 13 November 2018 to 30 June 2021. The MTR was conducted over a period of five months between 1st May and 30th September 2021 by a single international consultant, culminating with a presentation to the PSC.

2.2 Review Objectives

89. As stated in the ToRs, the evaluation has the primary purposes of: (i) providing evidence of results to meet accountability requirements; and (ii) promoting learning, feedback, and knowledge sharing through results and lessons learned among UNEP, the SAICM Secretariat, the GEF and key stakeholders and executing partners.
90. Tangible lessons and action-oriented recommendations are being provided to augment performance going forward and correct observed deficiencies to put the Project on the right footing for the Terminal Evaluation (TE) and the ambition of achieving the intended results, outcomes, and global environmental benefits. The lessons, best practices and recommendations herein, should also be applied to future projects focusing on the sound management of chemicals as well, and the setting of a strategic vision for any post-project activities or any spin-offs of the SAICM project.

2.3 Review Methods

2.3.1 Approach

91. The review was principally guided by a number of questions falling under each of the following six criteria, which provided the anchor for the MTR's Evaluation Framework Matrix (Ref. Annex B):

- Strategic Relevance;
- Effectiveness;
- Financial Management;
- Efficiency;
- Monitoring and Reporting;
- Sustainability;
- Factors Affecting Project Performance and Cross-Cutting Issues.

92. The evaluation was also focused on a set of strategic questions, based on the Project's intended outcomes, which were expanded upon during project interviews:

- What risks exist for timely delivery of project outcomes by beneficiary countries (adoption of lead paint legislation, implementation of global procurement and Lifecycle Assessment (LCA) tools) and how could they be supported to ensure results are achieved in the intended times?
- Is there adequate consideration and planning for promotion and uptake of the global tools developed by SAICM stakeholders, and how can the project use ICCM5 to support this?
- What elements would be needed for an exit strategy for the project's benefits to be sustained after the project end, and how could this be incorporated in the project implementation including budget needs?

93. To look into these questions, the evaluator triangulated findings from:

- The review of project documentation and publications;
- Unstructured virtual interviews with key project stakeholders, executing partners the PEU and component leads, GEF Task Manager and relevant government representatives;
- Virtual meetings with national executing and target institutions (SMEs, several NCPA associations, research institutes, and NGOs among others); and
- Dissemination of an online questionnaire.

2.3.2 Data Collection

94. The MTR was conducted using a mix of approaches: (i) a desk review of project documentation; (ii) a review of documentation of UNEP policies and programmes and country strategy documents referenced in the ProDoc; and (iii) conducting virtual interviews and discussions with key project partners (at global, regional and national levels). A list of documents consulted for the MTR is provided in Annex C.

95. The MTR consultant undertook an exhaustive review of the rather substantial body of documentation that has been produced over the course of the project. The core list of

project documents noted in the ToRs was made available to the Review consultant electronically through [Microsoft SharePoint](#). Other sources of information, including documents external to the Project itself, academic journals, UNEP's Open Data Portal, UNEP's Medium-Term Strategies for the periods covering 2018-2021 and 2022-2025, UNEP's Programme of Work, as well as documents related to the Lead Paint Alliance, IOMC and UNEP's CiP Programme, have also been consulted as secondary data sources for cross referencing. The combination of the desk review of a range of documents and gathering of views from a range of stakeholders enabled verification and triangulation of information and helped reduce information gaps.

96. As part of the MTR, a total of 33 virtual interviews were undertaken using Zoom. A list of interviewees who participated in the consultations is provided in Annex D, with an indicative list of interview questions in Annex E. Following the formal interviews with stakeholders, additional actions were undertaken to continue information gathering, triangulating data, cross-referencing and validating data functions, including a trend analysis of the online survey. In some cases, these actions included follow-up consultations with specific stakeholders and the PEU for verification purposes.
97. The intervention logic in the ProDoc and the Results Framework were also carefully scrutinized to establish a reconstructed Theory of Change (ToC) as a means to ensure that there was a consistent and clear conceptual understanding of the project impact pathways (the reconstructed ToC is presented in Section 3).
98. In the absence of physical missions, the MTR took a pragmatic approach to concentrate on areas where it could add the most value. As part of the engagement, the Project's ToC and Results Framework and indicators therein were restructured in line with best practice and recommended changes were discussed with the PEU and component leads during a consultative workshop held on 30 July 2021. A supporting PowerPoint deck (Ref. Annex F) was produced for consideration prior to the workshop and input from participants, whose comments and feedback during the workshop were considered to improve both these monitoring tools.
99. The MTR developed an online questionnaire circulated to a total 103 individuals. The online survey, using the SurveyMonkey platform, consisted of 34 questions and was designed to gauge overall perceptions and thoughts about the results and impact of the SAICM project across four categories including: (i) Section 1 – Project Strategy, Design and Value; (ii) Section 2 – Project Planning and Reporting; (iii) Section 3 – Project Inception; and (iv) Section 4 – Project Execution and Delivery. In spite of virtual consultations, it was felt that the anonymity of an online questionnaire might surface issues that stakeholders might not necessarily want to share during interviews. The survey questionnaire was sent by e-mail to the designated contact persons on 30 July 2021, with soft reminders during mid-August. At the end of August 2021, 30 completed surveys have been received out of a total of 103, representing a 29% response rate. A copy of the online survey and results is available as an embedded file in Annex G.

2.4 Limitations of the MTR

100. Availability of information was highly satisfactory and there were no major methodological barriers or limitations that affected the MTR process. A complete set of documentation, SSFAs, progress reports, PIRs, technical and financial reports, PSC meeting minutes and technical papers, and knowledge management strategy were all submitted to the evaluation at the beginning of the MTR process. Upon request, additional documents were made available to the Review consultant for analysis.
101. There were several procedural limitations faced by the Review consultant as follows:

Language barrier: A number of the stakeholders from Latin America did not speak English well enough, presenting a challenge for Review consultant to interview them; with limited knowledge of the Spanish language. This bottleneck was overcome by sending questions in advance so interviewees could translate them and prepare in advance.

Unavailability of some interviewees: As the fact-finding stage was conducted during the summer months, many of those contacted were simply unavailable or did not reply to multiple requests for an interview. While the number of interviews and data collected was ample and more than sufficient, still, it would have been good to speak with some key individuals (i.e., NCP Jordan). In an effort to accommodate vacation schedules, the interview process went well into August; three weeks beyond what was envisioned in the inception report.

Virtual MTR: Virtual evaluations are never ideal, especially for projects like this one operating at different scales, and with such a diverse set of partners and SMEs. It would have been ideal if the Review consultant would be able to see progress related to reformulation of LiP and testing of CiP. Simply put, there is no substitute for verification missions and face-to-face interviews.

Community and gender expertise: As would normally be the case for a Project with significant gender aspects, a designated gender expert should have been part of the MTR team. The Review consultant, while having reviewed gender aspects superficially in other evaluations is not an expert in this domain. This should be remediated in the Terminal Evaluation.

2.5 Review Criteria and Ratings

102. Project performance was assessed in terms of strategic relevance, achievement of outputs, effectiveness, efficiency, sustainability and, factors and processes affecting project performance. Outcomes and impacts (actual and potential) stemming from the following definitions were used for each:

A. Strategic Relevance: The extent to which the activity is suited to the priorities and policies of the target group, recipient and donor. This will include an assessment of the project's relevance in relation to UNEP's mandate and its alignment with UNEP's policies and strategies at the time of project approval, as well as the complementarity

of the project with other interventions addressing the needs of the same target groups will be made.

B. Effectiveness: The MTR shall assess effectiveness across three dimensions: delivery of outputs, achievement of project outcomes and, where appropriate and feasible, likelihood of impact²⁵.

C. Financial Management: Under this criteria the MTR will assess: a) whether the rate of spend is consistent with the project's length of implementation to-date, the agreed workplan and the delivery of outputs and b) whether financial reporting and/or auditing requirements are being met consistently and to adequate standards by all parties.

D. Efficiency: The MTR will assess the cost-effectiveness and timeliness of project execution. Focusing on the translation of inputs into outputs, cost-effectiveness is the extent to which an intervention has achieved, or is expected to achieve, its results at the lowest possible cost. It should also assess ways in which potential project extensions can be avoided through stronger project management.

E. Monitoring and Reporting: The Review will assess monitoring and reporting across two sub-categories: monitoring of project implementation, and project reporting.

F. Sustainability: Sustainability is understood as the probability of the benefits associated with the project outcomes being maintained and developed after the close of the intervention.

G. Factors Affecting Project Performance and Cross-Cutting Issues: The MTR shall assess the following sub-criteria: (i) Preparation and Readiness; (ii) Quality of Project Implementation and Execution; (iii) Stakeholder Participation and Cooperation; (iv) Responsiveness to Human Rights and Gender Equity; (v) Environmental and Social Safeguards; (vi) Country Ownership and Driven-ness; and (vii) Communication and Public Awareness.

2.5.1 Rating scale

103. The majority of the criteria²⁶ were rated according to the following rubric:

- **Highly Satisfactory (HS):** The project had no shortcomings in the achievement of its objectives, in terms of relevance, effectiveness or efficiency;
- **Satisfactory (S):** The project had minor shortcomings in the achievement of its objectives, in terms of relevance, effectiveness or efficiency;

²⁵ At the mid-point more emphasis is placed on performance at the output and outcome levels, but observations about likelihood of impact may be helpful for course correction or adjusting the emphasis of the project's efforts.

²⁶ Relevance and effectiveness are critical criteria and therefore, the overall rating of the project for achievement of objectives and results may not be higher than the lowest rating on either of these two criteria. Thus, to have an overall satisfactory rating for outcomes a project must have at least satisfactory ratings on both relevance and effectiveness.

- **Moderately Satisfactory (MS):** The project had moderate shortcomings in the achievement of its objectives, in terms of relevance, effectiveness or efficiency;
 - **Moderately Unsatisfactory (MU):** The project had significant shortcomings in the achievement of its objectives, in terms of relevance, effectiveness or efficiency;
 - **Unsatisfactory (U):** The project had major shortcomings in the achievement of its objectives, in terms of relevance, effectiveness or efficiency;
 - **Highly Unsatisfactory (HU):** The project had severe shortcomings in the achievement of its objectives, in terms of relevance, effectiveness or efficiency.
104. Both Sustainability (and each of the dimensions of sustainability²⁷) and Likelihood of Impact are rated from **Highly Likely (HL)** down to **Highly Unlikely (HU)**. A Ratings Matrix supports the common interpretation of points on the scale for each evaluation criterion. These ratings are 'weighted' to derive the Overall Project Rating (Ref. Annex K).

²⁷ In the context of the MTR, sustainability is understood as the probability of continued long-term outcomes and impacts after the project funding ends.

3. Reconstructed Theory of Change at Evaluation

105. As applied to UNEP evaluations, Theory of Change depicts the logical sequence of desired changes (called “causal / impact pathways” or “results chains”) to which the project is expected to contribute. It shows the causal linkages between changes at different results levels (outputs, outcomes, intermediate states²⁸ and impact) and identifies the factors influencing those changes.
106. The reconstruction of a ToC can help identify linkages between outputs and outcomes, and the intermediary states between outcomes and intended impact. It identifies the “impact drivers” that move implementation forward, and the “external assumptions” in project design that affect performance yet are often outside the project’s ability to influence. In the context of this MTR, the ToC is a window to gauge whether or not the Project is doing the right work towards meeting its stated objectives, and gain a deeper insight into a wide range of evaluation criteria.
107. A ToC has been proposed in the Project Document²⁹ - alongside Results Framework - responding to the Project’s expected accomplishments and progress on both LiP and CiP, as well as the mechanisms for sound chemicals management to be implemented in pilot countries in support of the SAICM EPIs.
108. The ToC in the Project Document does not contain all the necessary elements to be useful as a decision support tool to explain the changes and intermediate states that need to occur for impact, nor does it sufficiently explain the causal pathways. It could also have benefited from some assumptions.
109. In that regard, the proposed modified ToC was originally developed at the outset of the MTR and included in the Inception Report to guide the evaluation. In this modified ToC, effort was placed on identifying impact pathways (blue arrows), implying the transformation of the activities that generate outputs (light blue boxes), to outcomes (blue) and impacts (green). In this case, the outcomes can also themselves be considered intermediate states, which taken together, are amplified through the Project and specifically through Component 3 to help realize the core objective.
110. A preliminary and topical analysis undertaken during the preparatory phase of the MTR reveals there are essentially two impact pathways that are mutually reinforced by greater collaboration and specialized content underpinned by a robust platform to facilitate knowledge and information sharing:

Impact Pathway 1: With strengthened capacity, awareness and hands-on policy support through legal reviews and assistance on legislation, together with demonstrable examples of SMEs reformulating their products, countries can accelerate progress on the SAICM EPI of restricting the use of lead paint, thereby contributing to the SAICM 2020 goal and SDGs.

²⁸ <https://www.unenvironment.org/pt-br/node/16893>

²⁹ Project Document, Annex A

Impact Pathway 2: With improved training, political commitment and better technical and scientific knowledge made possible through the piloting of new tools and guidance targeting supply chains and public procurement, SAICM stakeholders will be in a position to reduce the use of CoCs in the building, electronics and toys sectors.

111. As part of the MTR process, a consultative workshop was held on 30 July 2021 with the SAICM project's core management using the above-noted ToC as a baseline for further discussion and refinement. The reconstructed ToC given in the Figure 5 below was developed based on the outputs of the workshop.

112. Subsequent amendments were based on the premise that:

Impact Pathway 3: There is a reinforcing feedback loop between Outputs 1.1 and 1.2 in that the availability of comprehensive information and awareness, as well as knowledge on the risk posed by lead in paint (and eventual compliance requirements) would encourage paint manufacturers to develop sound strategies for the reduction / phase out of lead in paint. Conversely, the demonstration pilots with SMEs would add to the body of knowledge demonstrating the technical and economic feasibility of alternatives, thus reducing the barriers to adoption of additional regulations. When combined with key awareness events, the demonstration pilots would create political pressure and momentum towards legislation to restrict lead in paint in these countries.

Impact Pathway 4: The success of the Project is very dependent on the availability and consistent flow of information through the building of a repository and the use of a KM platform. Therefore, there is an impact pathway from the deliverables of the Project and both outcomes to Output 3.2. As such, once reliable information and success stories have been generated by the Project, it is necessary that these are disseminated to the key stakeholders via appropriate channels. This would contribute to influence policymakers and other key national stakeholders to make informed decisions that would increase the likelihood of the proposed intermediate states and help realize impacts and upscaling in the long term.

113. Finally, assumptions that appeared in the Results Framework have been carried over and mapped to relevant parts of the ToC in Figure 6 to complete the analysis.

114. Revisions to the Project's ToC underscore there are feedback loops between technical capacity and actual realization of the outcomes that are mutually reinforcing and symbiotic. Good capacities contribute to good performance, which in turn improves the capacity level over time through the experience and insight that is gained. Similarly, having an information baseline through technical guidelines helps to guide project implementation, and measure changes to the pre-project situation; the information baseline also expands as the implementation process advances. The third project component on knowledge management is transversal to the other project components. The analysis suggests that different clusters of outputs and outcomes should ideally be implemented sequentially, following their impact pathways, to maximize their collective impact. This is admittedly difficult to achieve over a four-year period.

Figure 5. Reconstructed Theory of Change at Evaluation

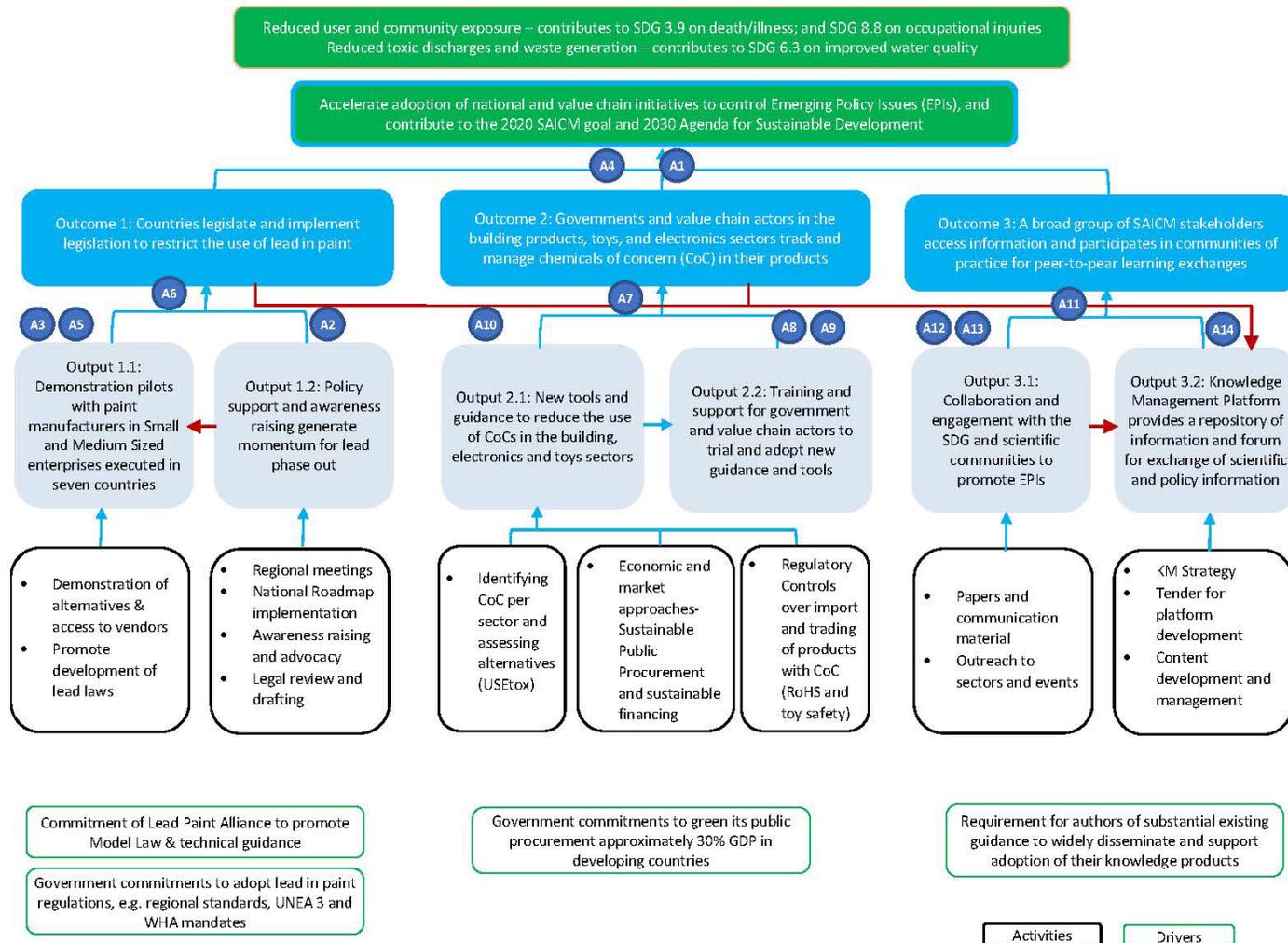


Figure 6. Mapping of Assumptions and Risks Relevant to the ToC

Code in ToC Diagram	Assumption & Risks
Project Objective – Indicator 1	<ul style="list-style-type: none"> Political will exists for taking recommended measures. (A1) Alternatives to CoC exist in LMIC markets. (A1)
Outcome 1 – Indicator 2	<ul style="list-style-type: none"> Governments are proactive. (A2) Project has adequate resources to provide legal drafting assistance to 50 countries. (A2)
Outcome 1 – Indicator 3	<ul style="list-style-type: none"> Lead free methods are either cost neutral or imposed by regulation. (A3)
Outcome 1 – Indicator 4	<ul style="list-style-type: none"> The few activities directly funded by the Project will trigger partners to scale these events up. (A4)
Output 1.1	<ul style="list-style-type: none"> SMEs are able to phase out use of lead in paint. (A5)
Output 1.2	<ul style="list-style-type: none"> Governments receptive to working with the project to expedite lead paint regulation. (A6) Pressure from industry does not prevent governments regulating lead paint. (A6)
Outcome 2 – Indicator 5	<ul style="list-style-type: none"> Governments are committed to implementing their published SPP policies. (A7)
Outcome 2 – Indicator 6	<ul style="list-style-type: none"> Training participants are selected based on their ability to implement changes as a result of the training. (A8)
Output 2.1	<ul style="list-style-type: none"> Alternatives to CoC exist and are accessible to producers in LMIC markets; the USEtox model is suited to their needs. International building council and global initiatives have capacity to address all their stated priorities including healthy buildings. Limited government commitment to implementing agreed SPP guidance and criteria (this is the only Risk listed). (A9) Government procurement services will implement their policy. Electronics that comply with EU ROHS legislation at a minimum are available in LMIC. SME and 'non-affiliated' toy producers are engaged to reduce toxic contents, driven by regulations in export markets.
Output 2.2	<ul style="list-style-type: none"> Project partners are able to build momentum within project local markets for companies to participate in trainings. (A10)
Outcome 3 – Indicator 1	<ul style="list-style-type: none"> Access to key publications is possible via open access journals. (A11)
Outcome 3 – Indicator 2	<ul style="list-style-type: none"> SAICM stakeholders have an appetite for exchanging information on EPIs. (A12)
Output 3.1	<ul style="list-style-type: none"> The science and academic community are willing to engage with SAICM and are forging links between the EPIs and the relevant SDG targets. (A13)
Output 3.2	<ul style="list-style-type: none"> Assumption that the organizations and projects that have developed a very comprehensive base line of knowledge products and experiences, will be willing and committed to sharing these through a SAICM KM platform. (A14)

4. Review Findings



4.1 Strategic Relevance

115. The Project is strategically relevant to national and global needs both in design and implementation, specifically through its efforts to operationalize the SAICM through institutional strengthening of the EPIs on LiP and CiP at both the national-level, within targeted political / economic unions at the regional level and globally. Its role on enhancing the implementation of key chemical frameworks is directly relevant to the role of UNEP³⁰, which is the leading global environmental authority that sets the global environmental agenda, promotes the coherent implementation of the environmental dimension of sustainable development within the UN system and itself promotes the sound management of chemicals through [relevant programmes](#).
116. Moreover, the baseline scenario in the Project Document articulates pervasive unpreparedness, uneven progress on LiP and CiP issues and information gaps that underscore the need for a project of this type.
117. The Project is highly relevant by supporting the implementation of the SAICM at the country level, by (i) prioritizing those countries which have signalled a strong commitment to instituting lead paint regulation, as well as those which have made less progress and require more hand-holding (Outcome 1.1); through seven demonstration pilots with paint manufacturers in Small and Medium Sized enterprises (Outcome 1.2); and (iii) by actively supporting government and value chain actors to trial and adopt new guidance and tools (Outcome 2.2). In these recipient countries therefore, chemicals will be managed in a more effective manner - especially at the supply chain level – leading to a decrease in adverse effects on human health and the environment. In addition, the KM platform aims to support country-driven knowledge sharing and institutional strengthening at the national level, helping to instil ownership of the national governments and value chain actors in LiP and CiP issues. The demonstration pilots and government efforts have to be designed so as to be consistent with national development plans and strategies of relevant MEAs and frameworks.

Table 5: Demonstration Pilot Countries and Relevant MEAs

Country	SAICM (Government Focal Point Exists)	Party to the Stockholm Convention (Entry into Force)	Party to the Basel Convention (Entry into Force)	Party to the Rotterdam Convention (Entry into Force)	Party to the Minamata Convention (Ratification)
China	Y	Y 11/11/2004	Y 05/05/1992	Y 20/06/2005	Y 31/08/2016
Colombia	Y	Y 20/01/2009	Y 31/03/1997	Y 03/03/2009	Y 26/08/2019
Ecuador	Y	Y	Y	Y	Y

³⁰ Notwithstanding the important roles also played by the WHO and the Inter-Organization Programme for the Sound Management of Chemicals (IOMC), UNEP is heavily involved in the policy framework of SAICM. UNEP has led the work on Chemicals in Products since 2008 and continues facilitating CiP Programme pilot and implementation activities, stakeholder awareness and capacity building. In fact, through [Resolution IV/10](#), the SAICM Governing Body welcomed UNEP's CiP Programme as the means for all stakeholders to advance on this complex issue.

		05/09/2004	24/05/1993	02/08/2004	29/07/2016
Indonesia	Y	Y 27/12/2009	Y 19/12/1993	Y 23/12/2013	Y 22/09/2017
Jordan	Y	Y 06/02/2005	Y 05/05/1992	Y 24/02/2004	Y 12/11/2015
Nigeria	Y	Y 22/08/2004	Y 05/05/1992	Y 24/02/2004	Y 01/02/2018
Peru	Y	Y 13/12/2005	Y 21/02/1994	Y 13/12/2005	Y 21/01/2016

118. At a regional level, the ECOWAS Secretariat was mandated by its member states' Ministers of the Environment to develop lead paint regulations in a regionally coordinated manner, at the 2017 AMCEN meeting.

119. The global relevance of the SAICM project is equally coherent and resolutions from the SAICM community, as adopted at ICCM4 - and the Overall Orientation and Guidance (OOG) in [SAICM/ICCM.4/6](#), for achieving the 2020 goal of sound management of chemicals - have been the main drivers for the project design.

120. The Project is consistent and aligned to the GEF-6 chemical and waste strategy's long-term goal to prevent the exposure of humans and the environment to harmful chemicals and waste of global importance, including POPs, mercury and ozone depleting substances, through a significant reduction in the production, use, consumption and emissions/releases of those chemicals and waste. Specifically, activities are broadly in line with:

- **GEF-6 Strategic Objective 1:** Develop the enabling conditions, tools and environment for the sound management of harmful chemicals and wastes;
- **GEF-6 Strategic Objective 2:** Reduce the prevalence of harmful chemicals and waste and support the implementation of clean alternative technologies/substances;
- **GEF 6 C&W Program 1:** Develop and demonstrate new tools and economic approaches for managing harmful chemicals and waste in a sound manner via the development and piloting of new tools and guidance on market-based and economic tools to promote phase out of hazardous chemicals in supply chains;
- **GEF 6 Program 3:** Reduce and eliminate POPs by addressing the use of POPs chemicals of concern that are still used in building products, toys and electronics;
- **GEF-6 Program 6:** Support regional approaches to eliminate and reduce harmful chemicals and waste in LDCs and SIDS, where the project will work with a number of LDC and SIDS to eliminate lead in paint including through the regional economic commission in West Africa.

121. The Project is consistent with UNEA Resolutions (i) UNEP/EA.3/L.24 emphasizing the need to reduce exposure to lead, while encouraging governments to: develop, adopt, and implement legislation and support the private sector to eliminate lead paint; and (ii) UNEP/EA.4/L.9 emphasizing the cross-cutting and multi-dimensional nature of

the sound management of chemicals and waste, and the importance of strengthening the science-policy interface and the global evidence base for chemicals, among other issues.

122. A number of documents prepared in support of the Programme of Work (PoW) of the Chemicals, Waste and Air Quality for both the 2018-2019³¹ and 2020-2021³² biennium(s) articulate the vision for UNEP to strengthen “policies and legal, institutional and fiscal strategies and mechanisms for sound chemicals management developed or implemented in countries within the framework of relevant multilateral environmental agreements and the Strategic Approach to International Chemicals Management (SAICM)”. The Project is therefore, consistent and closely aligned to UNEP’s subprogramme 5 on Chemicals, waste and air quality, which is included in the Medium Term Strategy for the years 2018-2021.

Figure 7. UNEP MTS Chemicals, Waste and Air Quality Outcome Map



Source: [UNEP Medium Term Strategy 2018-2021](#)

123. The SAICM project is also of significant relevance for implementing the 2030 Agenda for Sustainable Development. SDG 3 (Ensure healthy lives and promote well-being for all at all ages) Target 3.9 (By 2030, substantially reduce the number of deaths and illnesses from hazardous chemicals and air, water and soil pollution and contamination), SDG 12 (Ensure sustainable consumption and production patterns) Target 12.4 (By 2020, achieve the environmentally sound management of chemicals

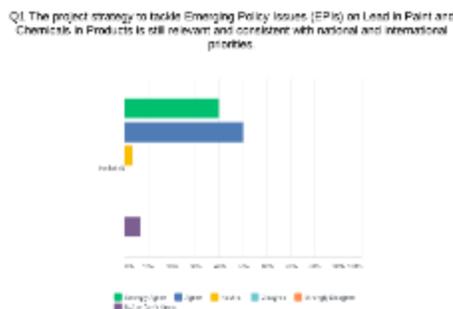
³¹ See [UNEP/EA.2/16](#), pp 53-55.

³² See [UNEP/EA.4/4](#), pp 76-78.

and all wastes throughout their life cycle, in accordance with agreed international frameworks, and significantly reduce their release to air, water and soil in order to minimize their adverse impacts on human health and the environment) and indirectly to SDG 6 (Ensure access to water and sanitation for all) Target 6.3 (By 2030, improve water quality by reducing pollution, eliminating dumping and minimizing release of hazardous chemicals and materials, halving the proportion of untreated wastewater, and substantially increasing recycling and safe reuse globally) are specifically related to the sound management of chemicals and waste. While Targets 3.9 and 12.4 are of direct relevance to chemicals and waste management they do not exist in a vacuum and therefore, the sound management of chemicals and waste cuts across the 17 SDGs.

- 124. The Project was geographically focused on developing countries and countries with economies in transition where use of LiP phased out in industrialized countries continues and is expected to grow, and where supply chains do not fully internalize the risks associated with CiP from a lifecycle management perspective. South-south cooperation was an important aspect of project design through its capacity building approach, involvement of technical experts and sharing of informational materials and technical guidelines produced by the Project for use in other countries to be replicated elsewhere.
- 125. The Review consultant’s assessment is reinforced by the stakeholders’ view that the Project is highly relevant and consistent with national and international priorities, with over 90% sharing this sentiment.

Figure 8. Relevance with National and International Priorities



- 126. Based on the above, the rating for the category of Strategic Relevance is **‘Highly Satisfactory’**.

4.2 Effectiveness

4.2.1 Availability of Outputs

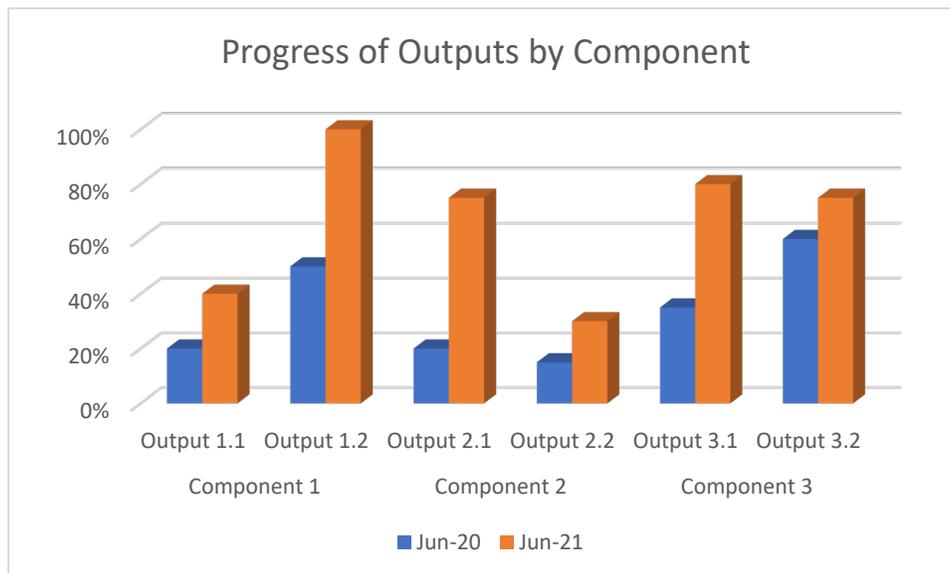
- 127. The original design of the SAICM project included a total of 57 activities designed to deliver 6 outputs across 3 outcomes. While none of the outputs or activities were amended during the Project’s inception phase, planning did go to a further level of granularity by parsing out key sub-activities, deliverables and milestones, and by

highlighting partners responsible for each, thereby facilitating overall project management and tracking.

128. An assessment of the achievement of outputs and activities is based on the Results Framework, monitoring reports including quarterly progress and yearly PIRs, as well as by gauging the percentage complete against remaining activities at this juncture in the Project. A review of the Results Framework shows a coherent approach and logical work breakdown structure, and that all activities and outputs are necessary and appropriate, and formed a series of sequential steps towards achievement of the project outcomes and objective.

129. The results of this assessment, summarized in Figure 9 and Table 6 below, suggest that overall delivery of the SAICM project is strong, having exceeding many of its mid-term targets and closing in on the end-of-project targets in the Results Framework, with a year left of operations. According to information available, activities have been satisfactorily undertaken, and while there are milestones tracking slightly behind schedule, the Project has also demonstrated clear examples of the use of adaptive management to compensate, and strategies to make up for lost ground. Based on a cross-section of products reviewed, the quality of the outputs delivered is high.

Figure 9. Progress of Outputs by Component



Source: Analysis based on data from 2020 and 2021 PIRs and project output targets.

Table 6: Planned Versus Actual Outputs

Project Component	Planned Project Output	Target(s)	Actual Output	MTR Remarks and Rating ³³
<p>1. Lead in paint: Working with governments to develop laws that restrict the use of lead in paint and working with SMEs to promote the phase-out of lead additives.</p>	<p>Output 1.1: Demonstration pilots with paint manufacturers in Small and Medium Enterprises executed in eight countries</p>	<p>Mid-term</p> <ul style="list-style-type: none"> 8 demonstration pilots finalize national paint sector reviews 4 governments receiving legal drafting support from ABA-ROLI 	<p>Per the 2021 PIR the following progress has been noted:</p> <ul style="list-style-type: none"> Progress since the last PIR has doubled and now stands at 40% against the end-of-project target; 14 SMEs in 8 countries³⁴ have completed their paint reformulation projects and switched to lead free paint production; Another 22 SMEs are in the process of completing the demonstrations projects for a total of at least 36 SMEs. 	<ul style="list-style-type: none"> Output 1.1 has a total of 7 activities with only one (1.1.7) delayed; Progress noted in the PIR has been cross-referenced with NCPD Serbia and ABA-ROLI and found to be consistent; Per workshop to review Results Framework, the Project cannot take credit for activities in Tunisia and therefore, modification to the output is recommended following the MTR, in line with the recommendations in Section 4.5; Output 1.1 is on track and has achieved its mid-term targets. <p>Rating: S</p>

³³ HS: highly satisfactory, S: satisfactory, MS: moderately satisfactory, MU: moderately unsatisfactory, U: unsatisfactory, HU: highly unsatisfactory

³⁴ China: 5, Colombia: 1, Ecuador: 3, Indonesia:1, Jordan:1, Nigeria: 1, Peru:1 and Tunisia: 1

Table 6: Planned Versus Actual Outputs				
Project Component	Planned Project Output	Target(s)	Actual Output	MTR Remarks and Rating³³
	Output 1.2: Policy support and awareness raising generate support for lead phase out.	<u>Mid-term</u> <ul style="list-style-type: none"> 20 countries receiving drafting assistance Events convened in 15 countries for International Lead Poisoning Prevention Week 	Per the 2021 PIR the following progress has been noted: <ul style="list-style-type: none"> Progress since the last PIR has doubled and now stands at 100% against the end-of-project target; Over 70 countries have received technical assistance for drafting lead paint legislation and 19 countries are in the last stage for issuing a lead paint legislation; More than 15 national workshops with relevant stakeholders have been conducted; In 2019, 57 countries convened ILPPW events for a total of 89 awareness-raising events, while in 2020, 55 countries convened 90 ILPPW events and 2 global events. 	<ul style="list-style-type: none"> Output 1.2 has a total of 11 activities, whereby a number of sub-milestones for 4 of these are either delayed or have not started - all related to the regional ECOWAS regulation on lead paint; Validation with ABA-ROLI noted that 21 countries had draft lead paint legislation completed and in the process of adoption, with a further 19 countries in the process of finalizing advanced drafts of new laws; The end-of-project target of 50 countries having received legal assistance and 20 countries convening events for ILPPW has been reached. <p>Rating: HS</p>
2. Chemicals in products: Increasing the ambition of different stakeholders to track	Output 2.1: New tools and guidance to reduce the use of CoCs in the	<u>Mid-term</u> <ul style="list-style-type: none"> Report on CoC and alternatives in building sector 	Per the 2021 PIR the following progress has been noted: <ul style="list-style-type: none"> Progress has reached 75% of the end-of-project target; 	<ul style="list-style-type: none"> Output 2.1 has a total of 16 activities, whereby one or more sub-activities for 6 of

Table 6: Planned Versus Actual Outputs				
Project Component	Planned Project Output	Target(s)	Actual Output	MTR Remarks and Rating³³
and control chemicals of concern in products along the value chains of electronics, toys and building products sectors.	building, electronics and toys sectors	(global) <ul style="list-style-type: none"> • Cost benefit analysis for electronics SPP practices (Colombia) • 2 regional electronics studies (LAC and CEE) • Report on chemical concentrations in toys and regulatory compliance in China 	<ul style="list-style-type: none"> • 5 guidance reports published (2 on toys, 1 on building products, 2 on electronics); • 2 USEtox-based sub-models for screening and comparing chemical risks developed (toys & building products); • 2 Eco-Innovation Manual supplements (for building products and electronics) ready for testing; • SPP global guidance in the electronics sector ready for testing; • 1 additional guidance document and tools under (advanced) development (4 on electronics, 3 on building products and 3 on toys). 	them are either delayed or have not started. These are related to the SPPs in Sri Lanka, training / audit package for toys in China and SPP in Colombia for the electronics sector; <ul style="list-style-type: none"> • Guidance reports on CoCs have been completed and published on the KM platform, including: (i) report on chemicals of concern and potential alternatives in the building sector; (ii) report on regulatory approaches addressing CoC in electronics and policy recommendations; and (iii) report reviewing toy safety policies and regulations in selected Low- and Medium-Income Countries; • USEtox-based single-layer models

Table 6: Planned Versus Actual Outputs				
Project Component	Planned Project Output	Target(s)	Actual Output	MTR Remarks and Rating³³
				<p>for building materials and mouthing model for toys;</p> <ul style="list-style-type: none"> • Review of Chinese regulations on concentration of chemicals allowed in toys and testing conducted covering 28 chemicals; • Regional study for Latin America and the Caribbean on life cycle management of electronics completed with another for Eastern European regions pending in Q4; • Global technical guidelines on SPP drafted and undergoing peer review. <p>Rating: S</p>
	<p>Output 2.2: Training and support for government and value chain actors to trial and adopt new guidance and tools</p>	<p>N/A - no mid-term targets as the intervention logic recognized that guidance and tools would still be in development.</p>	<p>Per the 2021 PIR the following progress has been noted:</p> <ul style="list-style-type: none"> • Progress has hit 30% of the end-of-project target; • 3 training workshops for the building sector in Sri Lanka conducted and 1 training 	<ul style="list-style-type: none"> • Output 2.2 has a total of 9 activities, of which only 2 are completed. Of the remaining 7, one or more sub-activities are either delayed or

Table 6: Planned Versus Actual Outputs				
Project Component	Planned Project Output	Target(s)	Actual Output	MTR Remarks and Rating³³
			<p>workshop for the electronics sector in Colombia conducted;</p> <ul style="list-style-type: none"> • 3 outreach workshops organized (national & international). 	<p>have not started;</p> <ul style="list-style-type: none"> • NCPIC and companies in Sri Lanka trained on USEtox[®] model and on eco-innovation; • Training to date has either had to be scaled down (i.e. China) or held in a virtual setting; • The Project will need to double down on expediting the finalization of new guidance and tools for the, toys and electronics sector, to allow sufficient time for their piloting and to train a critical mass of government and value chain actors. <p>Rating: MS</p>
<p>3. Knowledge and stakeholder engagement: Improving access to information and knowledge on chemicals management</p>	<p>Output 3.1: Collaboration and engagement with the SDG and scientific communities to promote EPIs</p>	<p>Mid-term</p> <ul style="list-style-type: none"> • Target = 12 papers (5 policy briefs on SDGs 2, 3, 6, 11, 12; 5 thematic papers on water, cities, science etc; 	<p>Per the 2021 PIR the following progress has been noted:</p> <ul style="list-style-type: none"> • Progress has hit 80% of the end-of-project target; • 5 Policy briefs & 7 thematic papers on SDGs and chemicals related issues have been 	<ul style="list-style-type: none"> • Output 3.1 has a total of 5 activities, of which only 1 is complete. For the remaining 4, one or more sub-activities are either delayed or have not started;

Table 6: Planned Versus Actual Outputs				
Project Component	Planned Project Output	Target(s)	Actual Output	MTR Remarks and Rating³³
amongst SAICM stakeholders.		<ul style="list-style-type: none"> 1 gender review mapping EPIs and identifying gender priorities; 1 indicator mapping the paper reviewing contribution of EPIs to indicators of progress/ impact). 	<p>produced and published on the SAICM KM platform;</p> <ul style="list-style-type: none"> 1 indicator mapping the paper reviewing contribution of EPIs to indicators of progress/impact submitted to the SAICM intersessional process; 4 presentations on SAICM at scientific community events & 4 presentations at related policy events; 1 project side event at OEWG3 in Montevideo, Uruguay; More than 112 stories on SAICM, SAICM EPIs, and chemicals have been developed and published at the IISD SDG Knowledge Hub and in the SAICM KM platform - https://saicmknowledge.org/blog. 	<ul style="list-style-type: none"> Mid-term targets have been met. <p>Rating: HS</p>
	Output 3.2: Knowledge Management Platform provides a repository of information and forum for exchange of scientific and policy information	<p>Mid-term</p> <ul style="list-style-type: none"> 1 SAICM Knowledge Management Strategy; 1 contract in place with web architecture service provider(s) for an integrated platform including spatial and non-spatial data; 5 maps and visual 	<p>Per the 2021 PIR the following progress has been noted:</p> <ul style="list-style-type: none"> Progress is estimated at 75% of the end-of-project target; A SAICM KM strategy has been developed to guide the KM activities within the project including the KM platform & the communities of practice; A beta-version of a Knowledge Management Platform was launched on 31 March 2020 to facilitate knowledge sharing on 	<ul style="list-style-type: none"> Output 3.2 has a total of 9 activities. Of these, 3 activities have sub-elements that are either delayed or have not started; Procurement on the KM strategy was delayed by UNEP's enterprise approach to pre-qualify IT vendors and

Table 6: Planned Versus Actual Outputs

Project Component	Planned Project Output	Target(s)	Actual Output	MTR Remarks and Rating ³³
		<p>tool prototypes constructed and tested; stakeholders consulted at OEWG3;</p> <ul style="list-style-type: none"> • Technical content on EPIs produced and submitted by project components (on HHP, EDC/EPPP, lead in paint and CiP). 	<p>SAICM emerging policy issues - www.saicmknowledge.org;</p> <ul style="list-style-type: none"> • A revamp of the website to include enhanced features and a refreshed look & feel is in progress and will be finished by February 2022. The current beta-version was enhanced in 2020/21 to include knowledge and information on all SAICM EPIs (in addition to the two project targeted EPIs) and a new URL was implemented; • The KM platform includes more than five interactive maps and data visualization resources e.g. GEF FSP, Quick Start Programme and Special Programme projects, Country profiles, lead paint standards, academic papers on nanomaterials. There are over 400 knowledge and information resources in the platform library and four communities of practice for regular online moderated discussions on HHPs, Chemicals in Products, Lead in Paint and Chemicals and SDGs. 	<p>subsequent procurement by UNON;</p> <ul style="list-style-type: none"> • High-quality technical specifications and business requirements document underpinning the KM platform revamp; • Migration is happening late in the project's lifecycle and there is a concern over the work effort vs. value that can reasonably be derived in the remaining six months of operations. Needs to be positioned with a broader scope; • Mid-term target relating to maps not possible due to insufficient geo-referenced datasets and technical content only relevant to LiP and CiP. <p>Rating: S</p>

4.2.1.1 Component 1: Lead in Paint

131. Taken together, Outputs 1.1 and 1.2 of the LiP component are designed to promote legislative and voluntary action by the government and industry to phase out lead in paint. Activities are purpose-built to chip away at the aggressive target at the outcome level, aiming for at least 40 countries to legislate and implement legislation on lead paint, and for at least 30³⁵ SMEs to phase out lead from their production processes through technical reformulation assistance.

132. Output 1.1 required significant preparatory work in collaboration with participating NCPCs, through a series of kick-off workshops on paint reformulation in SMEs which took place in Jordan, China and in Peru for LAC region in collaboration with NCPCs. Kick-off workshops took also place in Nigeria and Indonesia organized by SRADev and Nexus 3.

133. NCPC Serbia - one of the executing partners and champions of the Project coordinating the work with SMEs and acting as the main focal point to other NCPCs - pulled together step-by-step draft technical guidelines on paint reformulation. IPEN is also taking the lead in Indonesia and Nigeria to pilot test the guidelines at select SMEs. A workshop to present the draft technical guidelines on paint reformulation and to advocate towards broader lead paint laws took place on January 28-29, 2020 in Jakarta, which was followed up by a virtual workshop in May 2020 in Lagos, Nigeria. Presentation of the draft guidelines also took place in Peru, China and Jordan, during the NCPC launching workshop. A two-day validation workshop - which had originally been scheduled in 2020 in Belgrade at the height of the pandemic - to collectively discuss achievements, challenges, lessons learned, and to validate the draft technical guidelines was held virtually in April 2021. These workshops have been instrumental to augmenting the technical guidelines and to interface with both industry and lead-free pigment suppliers. The guidelines - which have subsequently been translated into Arabic, Chinese and Spanish –are currently being finalized with the expectation that these will be validated and finalized by the end of 2021.



“IN THE PAINT BUSINESS AND ESPECIALLY IN LMICS, SMES DO NOT LIKE TALKING TO GOVERNMENT. THE PROJECT PROVIDED AN OPPORTUNITY TO SPEAK DIRECTLY TO SOMEBODY THAT THEY WOULD NOT HAVE AN OPPORTUNITY TO SPEAK TO, AND ALSO PROVIDED THEM WITH CONTACTS TO ALTERNATIVE SUPPLIERS.”

- STAKEHOLDER PERSPECTIVE FROM MTR INTERVIEW

134. The Project has played a decisive role in helping interface with SMEs, who otherwise might not have been inclined to engage with government or begin reformulating their product; the NCPC has been a key intermediary throughout this process. To date, 14 SMEs have completed their paint reformulation projects and switched to lead free paint production for at least one of their products, with another

³⁵ Discrepancy noted by the MTR in the Results Framework, on number of SMEs to be targeted at the output-level (30) and at the outcome- / objective-level (50). In consultation with the core management team the MTR has suggested a more realistic target of 35 SMEs; see section 4.5 for details.

22 in the process of completing the demonstrations projects for a total of at least 36 companies in targeted countries.

135. Progress on Output 1.1 is measured by two mid-term targets as follows (i) 8 demonstration pilots finalize national paint sector reviews; and (ii) 4 governments receiving legal drafting support from ABA-ROLI. On both fronts the Project has registered strong results. It is also reasonable to assume that the remaining 22 SMEs can complete their reformulations within the time remaining, provided there are no further constraints caused by COVID-19 restrictions and additional lockdowns.

136. The Project has registered equally strong results for Output 1.2 as measured by (i) 20 countries receiving drafting assistance; and (ii) Events convened in 15 countries for

International Lead Poisoning Prevention Week. With over 70 countries having received technical assistance for drafting lead paint legislation from ABA-ROLI and 90 ILPPW events in 55 countries and 2 global events convened in

"MUCH BETTER RESULTS COULD HAVE BEEN ACHIEVED IN THE ABSENCE OF THE PANDEMIC. REFORMULATION IS DEPENDENT ON THE LAB BEING OPEN, SOMEBODY HAS TO PREPARE SAMPLES"

"THE WORK DONE WITH SMES SUFFERED A LOT BECAUSE OF THE LOCKDOWN. MANY COMPANIES COULD NOT EVEN OPEN"

- STAKEHOLDER PERSPECTIVE FROM MTR INTERVIEW

2020 alone, the Project has exceeded its end-of-project targets for this output. One concern flagged by the MTR is the sub-optimal progress made to date on the ECOWAS regional standard. While not affecting the output target directly, these sub-activities under Output 1.2 are inextricably linked to the attainment of the Project's outcome and ultimately its core objective. For more information see [Section 4.2.2](#).

4.2.1.2 Component 2: Chemicals in Products

137. Made up of two outputs, this component aims to accelerate the adoption of measures by governments and value chains to track and control chemicals in supply chains for building products, electronics and for toys. Its purpose is to create demand-driven and market-based incentives for supply chains to act via public procurement and sustainable finance measures; develop quantitative life cycle assessment tools to compare chemical alternatives and avoid regrettable substitutions; and enhancing the ambition of and compliance with regulatory requirements of chemicals of concern.

138. Output 2.1, consisting of 16 sub-activities, aims to develop new tools and guidance to reduce the use of CoCs in the building, electronics and toys sectors. While output delivery was low up until mid-2020, it has picked up considerably in the past year having reached satisfactory levels with 10 of 16 sub-activities reported as fully completed and having reached 75% of the end-of-project target.

139. Since the Project's outset, in-depth research and analysis on chemicals of concern in buildings and toys have been conducted for the development of tools and an initial mapping of alternatives to be used in these sectors. USEtox® has updated its single-

layer model for and finalized life cycle assessment tools for chemicals of concern in buildings and toys.

140. Draft versions of global guidance documents have been produced for SPP, covering provisions for the management of chemicals of concern and for eco-innovation in the electronics and buildings & construction sectors. Furthermore, an analysis of the nature of electronic products and building materials manufactured and purchased in Colombia and Sri Lanka, respectively, was developed. This analysis was expected to serve as a basis for the local technical specifications for the purchase of electronics and building materials to be developed for Colombia and Sri Lanka, using the global guidance, and applying them to existing national SPP practices in targeted sectors.

“MANY PEOPLE STILL DON'T KNOW WHAT IT MEANS TO MANAGE CHEMICALS SUSTAINABLY ALONG THEIR LIFECYCLE; THIS PROJECT, LEVERAGING THE USETOX MODEL, HAS OFFERED TOOLS THAT REALLY SUPPORT IN SUSTAINABLY MANAGING CHEMICALS.”

- STAKEHOLDER PERSPECTIVE FROM MTR INTERVIEW

141. However, while the original intent was to test these in Colombia and Sri Lanka to obtain relevant feedback on their implementation and to incorporate these lessons to the final documents, there has been a change in approach owing to the insolvency of the NCPD in Colombia and a new activity on eco-labelling is being proposed to replace the originally planned activity on Sustainable Public Procurement in Sri Lanka.
142. The following guidance reports on CoCs have been completed and published on the KM platform, including:
- [report on chemicals of concern and potential alternatives in the building sector](#);
 - [report on regulatory approaches addressing CoC in electronics and policy recommendations](#); and
 - [report reviewing toy safety policies and regulations in selected Low- and Medium-Income Countries](#).
143. There has also been a comprehensive [review of Chinese regulations on concentration of the chemicals allowed in toys](#), testing conducted by BCRC China covering 28 chemicals as well as a comprehensive review of legislation from other countries that will support awareness raising activities. A regional study for Latin America and the Caribbean on life cycle management of electronics has been completed with another for Eastern European regions pending in Q4 of 2021.
144. Output 2.2, consisting of 9 activities, has lagged with only 2 sub-activities noted as completed to date. This is primarily due to dependencies on the availability of tools and guidance under Output 2.1. The finalization of outputs under 2.1 therefore, has had a cascading effect on the progress of Output 2.2, which stands at only 30%. The intervention logic of the Project is built on the premise that this next step will allow the adoption of measures by governments and value chains to track and manage chemicals in supply chains for the three sectors.

4.2.1.3 Component 3: Knowledge management

145. Outputs 3.1 and 3.2 of the component on knowledge management aim to enable countries and stakeholders to access up to date information produced by the Project and other stakeholders on the EPIs, and actively contribute to communities of practice for peer-to-peer learning exchanges, to support decision-making and development of new initiatives towards the 2020 SAICM goal and the 2030 Sustainable Development Agenda. In parallel this component also contributes to the 'Knowledge and Information' objective³⁶ of SAICM.
146. Output 3.1 has produced a tremendous amount of content and information for the KM platform, including: (i) more than 112 stories on SAICM, SAICM EPIs, and chemicals have been developed, and also published on both the IISD SDG Knowledge Hub and SAICM KM platform at <https://saicmknowledge.org/blog>; (ii) 5 Policy briefs and 7 thematic papers on SDGs and chemicals related issues have been produced; (iii) 1 indicator mapping paper reviewing contribution of EPIs to indicators of progress/impact submitted to the SAICM intersessional process and used as part of discussions on the VWG1; (iv) 4 presentations on SAICM at scientific community events & 4 presentations at related policy events; and (v) 1 project side event at OEWG3 in Montevideo, Uruguay. Another key tool of note is the [SAICM map](#) of lead paint laws.
147. Outputs have exceeded their mid-term targets and are within 20% of reaching end-of-project milestones. However public-awareness activities 3.1.4³⁷ and 3.1.5³⁸ are dependent on the status of international events, including ICCM5 which is currently programmed for after the Project's operational closure at the earliest. Mitigations are being considered by the SAICM Secretariat's communications expert.
148. While still having achieved 75% of the end-of-project target, progress on Output 3.2 has been constrained by procurement issues which have delayed the migration to a new KM platform. While the underlying approach for UNEP to shortlist pre-qualified vendors to service its broader enterprise IT requirements is a good one (and from which the SAICM project was to issue a Request for Services and pull from approved vendors of record), execution on this strategy has been quite poor, albeit not the fault of the Project. The result however has been a procurement that took well over eight months and has now resulted in the Project having to rush a migration before the current hosting agreement expires in February 2022. Also, the new KM platform comes relatively late in the project's lifecycle calling into question whether or not the investment is now worthwhile if it is not positioned strategically to serve a broader purpose.
149. Notwithstanding, the Project has delivered a robust KM strategy, the beta-version of the KM platform launched on 31 March 2020 is serving its constituents well and is

³⁶ https://saicmknowledge.org/sites/default/files/publications/SAICM_Policy_Brief_KnowledgeInfoSharing.pdf

³⁷ A presentation on SAICM & project outcomes was scheduled at the [48th IUPAC World Chemistry Congress | 104th CCCE 2021](#) (International Union of Pure and Applied Chemistry), which were held virtually.

³⁸ Ongoing discussions are being led by the SAICM communications expert to organize an outreach event due to the postponement of ICCM5.

feature-rich with more than five interactive maps and data visualization resources (including the GEF FSP, Quick Start Programme and Special Programme projects, Country profiles, lead paint standards and academic papers on nanomaterials). There are over 400 knowledge and information resources in the platform's library and four communities of practice for regular online moderated discussions on HHPs, Chemicals in Products, Lead in Paint and Chemicals, and SDGs.

150. The MTR also notes the procurement of a vendor to undertake development work for and migration of the new SAICM KM platform is anchored to an exceptionally strong [business requirements document and technical specifications](#); again, demonstrating seasoned management and long-term strategic thinking.
151. Based on the justification, Figure 9 and Table 7 below, the rating for the category of Availability of Outputs is **'Satisfactory'**.

4.2.2 Availability of Project Outcomes

152. Summarized in the table below, the achievement of project outcomes is assessed against those articulated in the Results Framework. These are outcomes that are intended to be achieved by the end of the project timeframe and within the SAICM project's resource envelope. Emphasis is placed on the achievement of project outcomes that are most important for attaining the desired intermediate states.

"IT IS IMPERATIVE TO DESIGN MAINSTREAMING INTERVENTIONS WITH A LONGER-TERM PERSPECTIVE AND RESOURCE ENVELOPE TO ENSURE SUSTAINABILITY"

- **FINDINGS** FROM THE GEF INDEPENDENT EVALUATION OFFICE

153. The MTR finds that the Project's three outcomes, or permutations therein, are most likely to be achieved by its operational closure in 2022. However, there are several notable risks (specifically with respect to Outcomes 1 and 2) which need to be taken seriously at this juncture in the Project and **actively** mitigated by the wider management team. Efforts should be taken to double down on those activities that will contribute to the attainment of these outcomes and ultimately the core objective.
154. The MTR also notes another contributing factor that may undermine the realization of the Project's outcomes relates to the inconsistency of project timelines with the actual dynamics of government, especially those associated with supra-national political and economic unions such as ECOWAS. The Project was designed more with the Beyond 2020 Intersessional Process in mind and the need to demonstrate progress at ICCM5, than the realities of formalizing legislative processes on LiP and breaking new ground on CiPs with new tools and guidance. Project design - and consequently the outcome targets - were unrealistically ambitious in relation to the time available. Four years is insufficient to bring about legislative and systemic changes, build capacities and raise public awareness around issues that are still not in the public consciousness.

Table 7: Availability of Project Outcomes at Mid-Term			
Outcome	Indicator(s)	Assessment of "Availability" of Outcomes at Mid-Term: High / Med. / Low	MTR Comments
Countries legislate and implement legislation to restrict the use of lead in paint	1. Number of countries with adopted legislation on legal limits to LiP	High	<ul style="list-style-type: none"> • As of July 2021, a total of 83 countries have adopted legislation on legal limits to LiP • The Project has exceeded the MTR target by 3 (delta of 15 against a baseline of 68); • ABA-ROLI notes there are a further 19 countries that are in the process of finalizing advanced drafts of new laws via technical support; • There is a disconnect between this indicator for Outcome 1 and the Project's sphere of influence. The MTR notes the number of countries which pass legislation is a poor indicator as the Project has no control over legislative processes and also misrepresents the work effort that goes into making this possible. <p>Risks:</p> <ul style="list-style-type: none"> • With 15 member states up for grabs, achieving the end-of-project target is inextricable linked to the regional standard for the ECOWAS region as this would be legally binding on member countries. Sustained and maximum pressure is needed here; • Following recent elections, it has come to light that a bottleneck preventing Ecuador from passing LiP legislation is the approval of technical guidelines and the government's

Table 7: Availability of Project Outcomes at Mid-Term			
Outcome	Indicator(s)	Assessment of "Availability" of Outcomes at Mid-Term: High / Med. / Low	MTR Comments
			willingness to pass legislation ³⁹ .
	2. Number of paint manufacturers switching to lead free production	Medium	<ul style="list-style-type: none"> • While the target of 50 SMEs having switched to lead free production by 2020 has not been achieved this indicator is problematic and needs to be revisited as 30 SMEs are noted at the output level and therefore, there is misalignment within the Results Framework; • To date 14 paint manufacturers have switched to lead free production in eight countries (China, Colombia, Ecuador, Nigeria, Tunisia, Peru, Jordan and Indonesia); • Another 22 SMEs are in the process of completing the demonstration projects for a total of at least 36 SMEs; • In consultation with the core management team and NCPC Serbia, the Review consultant recommends the target of 50 SMEs be adjusted to 35 following the MTR. <p>Risks:</p> <ul style="list-style-type: none"> • Further COVID-19 restrictions are likely to affect the feasibility of even the adjusted target

³⁹ **Reflection from Ecuador during the review cycle of the final MTR report:** We wish to provide a more accurate description of the situation in Ecuador and to note that risks are not limited to Ecuador. In Ecuador the government is conducting a review of all standards to ensure that they are not a burden on industry in hard economic times brought about by COVID. LP standards are tied up in this review and have been delayed as a result. There are numerous other risks, including Mexico, Brazil, Nigeria, Ghana, Rwanda, Cote d'Ivoire, that have final draft laws "stuck" in the political process.

Table 7: Availability of Project Outcomes at Mid-Term			
Outcome	Indicator(s)	Assessment of "Availability" of Outcomes at Mid-Term: High / Med. / Low	MTR Comments
			since the reformulation process is lab-oriented work. Progress to date has been disrupted by the closure of SMEs during the height of the pandemic.
	3. Number of registered awareness raising events	High	<ul style="list-style-type: none"> For 2020 alone, there were 90 events organized in 55 countries, in addition to 2 global events. The end-of-project target for the indicator has been exceeded. <p>Risks:</p> <ul style="list-style-type: none"> None foreseen
Governments and value chain actors in the building products, toys, and electronics sectors track and manage chemicals of concern (CoC) in their products	1. Number of governments and value chain actors tracking and managing CoC in products	Low	<ul style="list-style-type: none"> Process is at an incipient stage as guidance and new tools are not finalized; Due to the change in context, the target of 6 companies meeting SPP CoC requirements (Sri Lanka, Colombia) will need to change to "3 companies meet SPP CoC requirements and 3 companies meet eco-label CoC requirements (Sri Lanka, Colombia)"; The MTR notes that achieving 3 companies in Colombia meeting SPP requirements in the time remaining will prove challenging but not impossible; Given the existing indicator of 20 companies using USEtox® to evaluate toxicity in Sri Lanka and China, the indicator of 10 companies - in China alone - reporting toy audit results do not appear to be

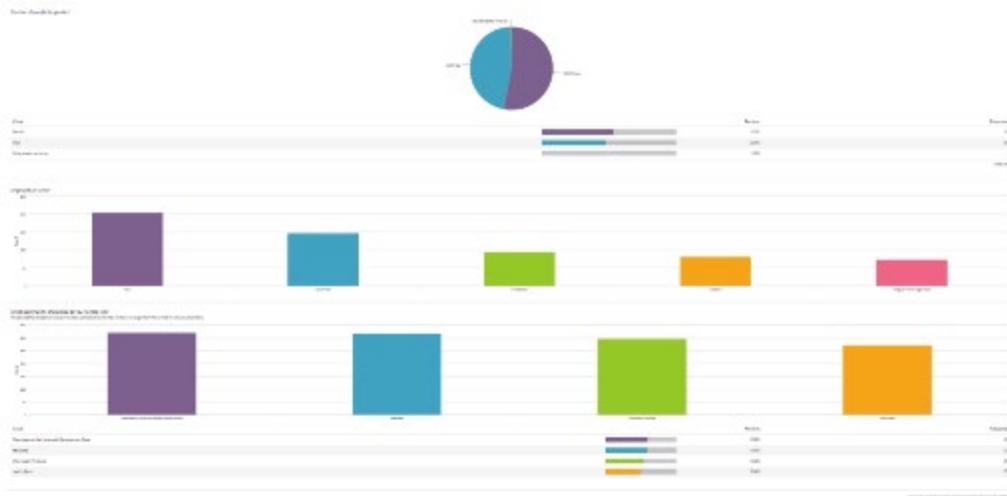
Table 7: Availability of Project Outcomes at Mid-Term			
Outcome	Indicator(s)	Assessment of "Availability" of Outcomes at Mid-Term: High / Med. / Low	MTR Comments
			<p>aligned. Also, given the difficulties to penetrate China given, and difficulties in getting access to Chinese companies in general, the target seems very ambitious and unrealistic.</p> <p>Risks:</p> <ul style="list-style-type: none"> • While the work to change procurement practices has already started, the Project needs to find a new partner now for the SPP activities in Colombia; • The SPP requirements still need to be finalized, leaving very little time for companies to implement the requirements as part of their public procurements;
	2. Number of trained value chain and government actors providing feedback on use of new tools and guidance (min 30% female)	High	<ul style="list-style-type: none"> • The project has exceeded the mid-term target of at least 30% of 305 individuals trained (of which 30 should be women). It has also collected feedback on how beneficiaries will use training: <ul style="list-style-type: none"> ○ Outreach workshop held in March 2021 in China with 29 external participants (60% female) and 30% of participants provided feedback; ○ 25 individuals (40% female) were trained by an international expert on eco-

Table 7: Availability of Project Outcomes at Mid-Term			
Outcome	Indicator(s)	Assessment of “Availability” of Outcomes at Mid-Term: High / Med. / Low	MTR Comments
			<p>innovation in Colombia;</p> <ul style="list-style-type: none"> ○ 36 individuals (44% female) were trained by an international expert on eco-innovation in Sri Lanka, with 47% (12 female, 5 male) providing feedback afterwards; ○ 26 individuals from Sri Lankan companies (15% female) were trained by a national expert on eco-innovation; ○ 9 individuals (52% female) in Sri Lanka were trained on the USEtox® tools. <p>Risks:</p> <ul style="list-style-type: none"> • While mid-term targets have been met, the ambitiousness of training had to be scaled down significantly as a result of COVID-19, thereby impacting governments’ and value chain actors’ ability to track and manage chemicals of concern in their products using the Project’s new tools and guidance.
A broad group of SAICM stakeholders access information and participate in communities of practice for peer-to-	1. Number of scientific knowledge resources shared with policy makers	High	<ul style="list-style-type: none"> • With over 70 science media sources produced by the project (including 5 Policy briefs & 7 thematic papers on SDGs and chemicals having been

Table 7: Availability of Project Outcomes at Mid-Term			
Outcome	Indicator(s)	Assessment of "Availability" of Outcomes at Mid-Term: High / Med. / Low	MTR Comments
peer learning exchanges.	on EPIs and SDGs		<p>produced and published on the SAICM KM platform) the Project has met the mid-term targets;</p> <ul style="list-style-type: none"> The CoP analytics in Figure 10 show the Project has also made inroads with attracting participation from academia per the Project's original vision. <p>Risks:</p> <ul style="list-style-type: none"> Without continued support and rich content generation post-project, there is a risk that interest and momentum will wane.
	2. Number of active members of KM communities of practice and users accessing information	High	<ul style="list-style-type: none"> The mid-term target of 4 CoPs established has been met as the Project has successfully set up Communities of Practice on LiP, CiP, HHPs and Chemicals, and SDGs; Each community of practice currently has more than 200 members registered (with registrations doubling in a span of a year); Gender distribution has been 53.4% Female; 46.3% Male; 0.4% Other/prefer not to say. <p>Risks:</p> <ul style="list-style-type: none"> Generally, the targets for Outcome 3 are significantly less ambitious than other components; The current business model for the CoPs is very much supply driven and there is a risk this will not be sustainable without transitioning to a demand-

Table 7: Availability of Project Outcomes at Mid-Term			
Outcome	Indicator(s)	Assessment of “Availability” of Outcomes at Mid-Term: High / Med. / Low	MTR Comments
			based model; <ul style="list-style-type: none"> Per Figure 11, the KM platform’s user base is mainly from developed countries. The focus of the project was on LMICs.

Figure 10. Subscription to the Communities of Practice



Source: https://data.surveygizmo.eu/r/90007427_5ee88d4ec2d646.24138667

Figure 11. Users by Country of the KM Platform from November 2020 to May 2021



155. Based on the above, the rating for the category of Availability of Project Outcomes, is **Satisfactory**.

4.2.3 Likelihood of Impact

156. The likelihood of impact is influenced by the degree to which “intermediate states” - the changes that are required between project outcomes and impact - have been achieved at the time of the MTR, or will be soon thereafter. In the case of the SAICM Project, the three outcomes are themselves intermediate states that connect directly to the project objective, and are therefore essential to generate the expected impacts described in the Project Document.

157. With respect to **Component 1**, the likelihood of impact increases significantly if the pipeline of 19 countries, that are in the process of completing advanced drafts of new LiP laws are approved in the coming months, to allow sufficient time for ratification by Parliaments or applicable legislative bodies. Impact will also depend largely on political decisions that are outside the Project’s control. Also, if there are no further SME closures due to pandemic restrictions, all stakeholders are confident that the remaining 22 demonstration reformulations can also be completed in relatively short order.

Figure 12. Lead Paint Law Status in Africa



158. Figure 12 and Table 8 illustrate the significance of passing a regional LiP standard for the ECOWAS region which would be legally binding for its 15 member states. Given the poor coverage of LiP laws in Africa this would certainly be a momentous achievement in itself and a key legacy for the Project. The impact threshold for Outcome 1 is clear, but the level of ambition is dependent on the delivery of the regional standard for the ECOWAS region.

159. Individual ECOWAS countries are working on laws in parallel, such as Nigeria and Ghana. They should be supported by the project, as it is far more likely that they will enact their laws before they can enact an ECOWAS standard.

Table 8: Status of Lead Paint Laws Among ECOWAS Member States		
No.	Member Country	Lead Paint Law Status
1.	Benin	Country does not currently have a lead paint law
2.	Burkina Faso	Country does not currently have a lead paint law
2.	Cabo Verde	There is no data available regarding status of a lead paint law

4.	Côte d'Ivoire	Country does not currently have a lead paint law
5.	The Gambia	Country does not currently have a lead paint law
6.	Ghana	Country does not currently have a lead paint law
7.	Guinea	Country does not currently have a lead paint law
8.	Guinea Bissau	Country does not currently have a lead paint law
9.	Liberia	Country does not currently have a lead paint law
10.	Mali	Country does not currently have a lead paint law
11.	Niger	Country does not currently have a lead paint law
12.	Nigeria	Country does not currently have a lead paint law
13.	Senegal	Country does not currently have a lead paint law
14.	Sierra Leone	Country does not currently have a lead paint law
15.	Togo	Country does not currently have a lead paint law

160. There is a hierarchy of outputs and outcomes that should be considered when planning implementation strategies and their associated timelines; these should be driven by work effort rather than timing of international events. The current situation for **Outcome 2** not only affects the second project component, but affects overall project value chain impacts, which are implementation-driven. Because the outcomes related to the adoption of guidance and value chain tools are dependent on their availability, the Project has not been able to demonstrate the process to proceed to the higher-order outcomes of the second component, which would have brought the Project closer to its main objective. The Project team remains confident that guidance and tools can still be piloted in the time remaining, but there are challenges to overcome, like finding a new partner for the LAC region in Colombia. Given greenfield nature of the value chain work, it is understandable and laudable that a lot of ground has been covered. There has been a clear focus on building consensus, peer review and quality of deliverables. There would be justification for extending the Project to provide additional time for higher order results to accrue.

161. The shortcomings from the Project's experience with Components 1 and 2 provide an interesting case study on how commendable project performance can fall short of achieving its ultimate objectives, when the outputs and outcomes that precede project impact aren't reached.

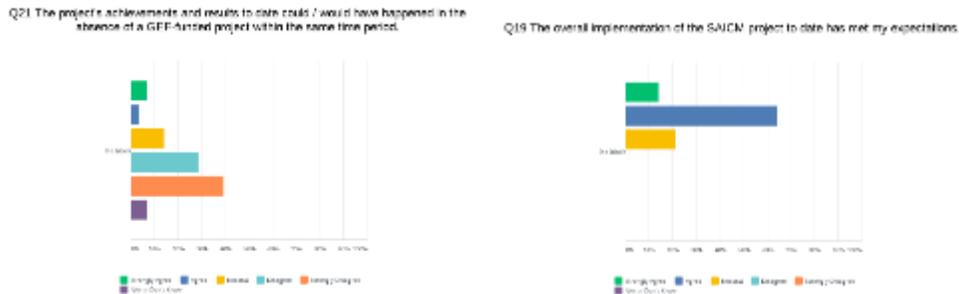
162. **Component 3** has been delivering impact through the existing beta version of the KM platform. The target state will be coming late in the project cycle and therefore, there needs to be a strong justification and business case for migrating to a new platform. The technical specification have done so and the Project has positioned the new KM platform to serve the broader SAICM framework. Both the institutional capacity and information management / public awareness aspects have been over-arching and fed into the first two components while being strengthened by the cumulative experience acquired. The Project has been delivering impact under a supply-driven model but the challenge will be to ensure momentum is carried forward in a demand-driven manner.

"THE PROJECT CAN TAKE CREDIT FOR AWARENESS RAISING. ANNUAL WEEKS OF ACTION WERE VERY HELPFUL AND INSTRUMENTAL"

- STAKEHOLDER PERSPECTIVE FROM MTR INTERVIEW

163. Perhaps most telling of the Project’s impact are stakeholder responses when asked whether the achievements and results could have happened in the absence of a GEF-funded project within the same time period and if overall implementation has met expectations. An overwhelming majority (nearly 70% either disagreed or strongly disagreed) with the former, and 75% had a favourable view of achievements to date.

Figure 13. Stakeholder Feedback on the Achievements and Results of the SAICM Project



164. The rating for the category of Likelihood of Impact is **‘Highly Likely’**.

4.3 Financial Management

165. The overall execution of the Project was done by the SAICM Secretariat. In this context, an Internal Agreement was fully executed between UNEP’s Economy Division, Chemicals and Health Branch (including the GEF team) and the SAICM Secretariat on 13 November 2018 to articulate the roles and responsibilities, as well as support required of both IA and EA. Per the Internal Agreement, the financial resources in the GEF-approved Project budget were to be managed by, and all disbursements processed by the SAICM Secretariat.

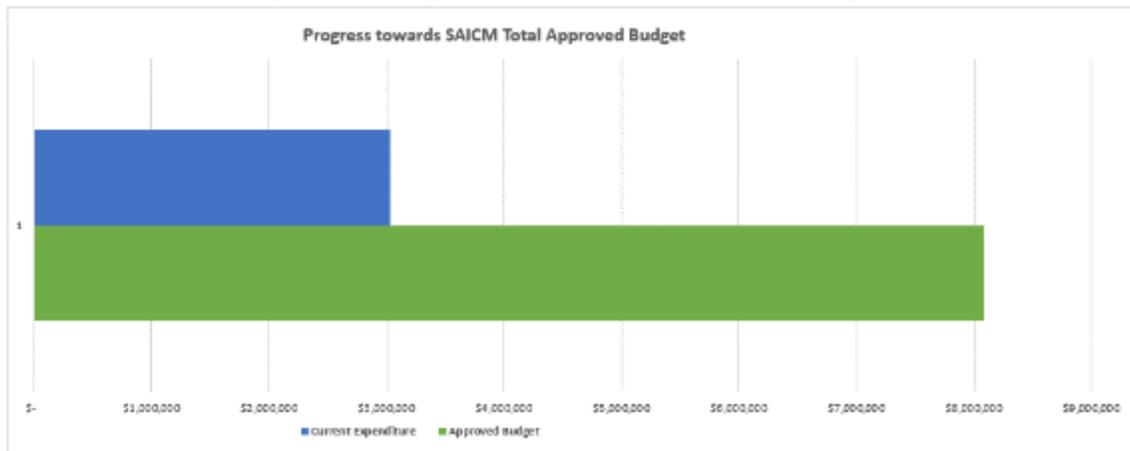
166. According to information made available to the Review consultant, the oversight function by the Task Manager for the management of GEF funds were compliant with relevant UN financial frameworks and procedures. For instance, once the Implementation Agreement was signed, the UNEP Task Manager informed the UNEP financial office for an initial cash replenishment of USD 2,270,503.00. For subsequent disbursements, the Task Manager ensured that quarterly financial (including detailed explanatory notes on expenditures incurred), a procurement plan and other technical reports were received before informing the financial officer to release the funds. The 2021 PIR notes that replenishments to date total USD 8,070,000.00. The process functioned smoothly due to a seasoned and knowledgeable Administrative and Financial Officer.

167. At the EA level, the GEF funds were also effectively managed. According to feedback gathered, the SAICM Secretariat followed the procedures set out in the Internal Agreement, as well as others set by UNEP. The Review consultant has also found evidence of best practices in financial management, including detailed budget forecasting which was used and relied on heavily for planning purposes - and shared with the Project Steering Committee - as opposed to the original budget at design. Another exemplary practice noted by the MTR was the contesting of charges made to

the Project without authorization and charges made to incorrect budget lines (i.e. USD 25,000.00 of staff & personnel charged from "Lead in paint (staff)" to "Regional consultants"). In both cases the PEU requested reversals and rectification of charges to the proper budget line to enable a better overall command and management of the budget. The PEU has had close communication with UNEP to ensure that all necessary procedures and protocols were followed for the disbursement of funds, and also coordinated regularly with the Task Manager about the financial management, and also in relation to reallocation opportunities that came up during project implementation. While there has been no major revision or overhaul to the budget, reallocations were routinely made between budget lines within acceptable thresholds, in consultation with the PSC.

168. The MTR notes that credit goes to the PEU who gave unstintingly of their time to help the Review consultant track down answers to all the financial-related questions asked and to discuss the points of clarification the Review consultant took every opportunity to raise. All key and available information on budget and expenditures for the SAICM Project has been provided in a transparent and timely manner, with requests for further information and documentation fulfilled expeditiously. As of 30 June 2021, cumulative expenditure stands at USD 3,288,467.00 or 40% of the GEF budget.

Figure 14. Progress towards the Total GEF Budget



169. While a 40% disbursement may seem low at MTR, it is important to highlight here the disbursement forecast for Q2 and Q3 of 2021 is USD 937,785.00, which is consistent with the narrative that many deliverables are being finalized and expected in late fall / early winter of this year. Furthermore, a more accurate benchmark of delivery are the funds which have been committed to date and stand at approximately USD 5,540,000.00 or 68% of the GEF resources as it heads into the final year of operations. UNEP rules dictate however that stakeholders only report on what has been spent.

170. While the current burn rate is promising, expenditure is not aligned to the original budget and altogether detached from the original budget's disbursement schedule. As noted above, the budget forecast is being used as the main financial management tool for planning purposes, in consultation with the PSC. Therefore, a formal budget

revision would be warranted at this juncture to reallocate unspent funds, streamline budget lines and reallocate budget that is in excess of that which will reasonably be needed (i.e. surplus from the MTR and TE, budgeted at USD 40,000.00 and USD 80,000.00 respectively). There is a need to modify the budget for 2021 which has only USD 463,666.67 earmarked per design and also include provisions for 2022. It is imperative that prior to this budget revision, discrepancies in financial accounting figures of the WHO, due to parallel financial systems, are resolved.

171. It is important to note that Project Management Costs have been capped at USD 390,000.00 in the Internal Agreement, with any cost overruns to be borne by the SAICM Secretariat. The expenditure of this budget line is quickly approaching USD 300,000.00 and therefore, alternative strategies and transition will be required to keep the PEU onboard for the remainder of the Project. Current estimates point that cost sharing by the SAICM Secretariat may be needed from October 2021 for the Administrative and Financial Officer, and from September 2022 onwards for the Project Manager / Knowledge Management Officer.
172. From a co-financing perspective, USD 13,959,031.00 in co-financing (65.5% of what has been pledged) has been mobilized by the Project. Again, there should be a sharp uptick in co-financing in the remaining two quarters of 2021 as partners finalize key deliverables.
173. Based on the findings described above, one can conclude that the GEF funds have been adequately and effectively managed. Financial management is consistent and has gone beyond financial management policies by incorporating best industry practices and the GEF's fiduciary standards are being met.
174. The rating for the category of Financial Management is **'Highly Satisfactory'**.

4.4 Efficiency

175. Efficiency is a performance issue regarding the timeliness and cost-effectiveness of the implementation of planned activities and the delivery of outputs and outcomes. These could include positive contributions to performance such as: cost and time saving measures; use of existing systems to support project design/activity; and fullest use of human and financial inputs; as well as negative contributions to performance such as: administrative delays and management delays.
176. The SAICM project stands out for its efficient management, implementation arrangements and performance. This was reflected in the efficient use of partnerships and existing methodologies, the professionalism and commitment of the PEU and core management team, and the quality of the overall implementation process. The Project also successfully coped with major commencement delays and asymmetrical implementation processes between countries, through close coordination and nimble adaptive management.

177. In general, efficiencies were either built into project design or have been realized through the use of proven models which allowed the Project to roll-out activities to a wider audience. To a significant extent, all components were built on existing tools and methodologies which could be augmented; for Component 1 this was evidenced through the model law and approach underpinning the prioritization of targeted countries where Component 2 was supported by the existence of lifecycle assessment and management tools such as USEtox[®] that could be refined through implementation. While not originally the plan, Component 3 was expedited by customizing (downsizing) an existing Drupal 7 template provided by IISD, in-house.

"WHEN THE PROJECT TEAM WAS HANDED LEMONS, THEY MADE LEMONADE"

"THE CIP COMPONENT LEADS WORKED VERY HARD TO CONNECT US WITH CHINA AND TO TEASE OUT WHAT THE ISSUES/CONSTRAINTS/PROBLEMS ARE, WHERE THE RELUCTANCIAS ARE COMING FROM. THERE IS NO WAY WE COULD HAVE MADE ANY CONTACT WITH THE COUNTRIES/INDUSTRY WITHOUT THEM AND THE SAICM PROJECT"

- STAKEHOLDER PERSPECTIVES FROM MTR INTERVIEW ON ADAPTIVE MANAGEMENT AND FLEXIBILITY

178. Recognizing the ambitious targets of the Project's design, it purposely tapped into existing networks of partners (Lead Paint Alliance and IOMC, to name a few)⁴⁰; by tapping into existing strategies to inform key performance indicators (Lead Paint Alliance business plan); and most importantly, leveraging existing subject matter expertise and involving organizations with an established pedigree of working at the country level on chemicals issues (NCPCs, IPEN, BCRC regional offices and University of Cape Town). Also, the USEPA brought in the international laboratory accreditation community and linked them with UNEP to increase lab capacity. From a governance perspective, the PSC was also comprised of individuals who could bring deep experience and thought leadership to each of the components, including those who have set-up and managed effective KM platforms internationally. The close involvement of Regional Offices, in some cases, increased efficiency as project implementation benefited from their better regional knowledge, contacts and experience. The SAICM project also piggybacked on ILPPW activities and used events as a conduit to drum up interest on initiating legislation.

179. In some cases though, organizations - such as the WHO - were not engaged to the full extent of the value they could have brought to the table; with a year left there is still ample time to utilize them to their full potential.

180. Implementation was not without its challenges, but the Project, and specifically the core management team, demonstrated poise, resiliency and flexibility to work through difficult issues, quickly change course and adopt a new strategy. This is illustrated by changes to the scope and activities of the NCPC in Sri Lanka. With the government in Sri Lanka changing in 2019, the policy approval agency was subsequently dismantled

⁴⁰ **Reflections by the EPA during the review cycle of the final MTR report:** A mention should also be made here that EPA brought in ABA ROLI to the Alliance work prior to the GEF Project, and ABA-ROLI was able to bring in pro bono assistance as well as their own professional expertise. EPA also brought in INECE, which hosted the first virtual workshop on enforcement of lead paint laws. (at no cost to the Alliance)

delaying the SPP policy which requires approval by the national Public Procurement Commission. Without this approval, the Ministry of Environment does not have the authority to develop SPP criteria. Because of this obstacle, NCPC Sri Lanka proposed the development of an eco-label - in consultation with the national steering committee and component leads - so that when the policy is approved, the government can outline the criteria of the eco-label products as part of the SPP.

181. A significant weakness was that the project was slow to engage interested countries in country-specific (or multi-country) drafting workshops, as EPA and UNEP RONA did early on with Jamaica prior to the GEF Project starting (this ended up being a pilot for the GEF project approach). Furthermore and later in the project, there was a long gap between the last regional workshop and the first country drafting workshop (which could have been done virtually even if in-person was not feasible due to COVID-19 restrictions).
182. Remarkable progress has nonetheless been achieved in spite of COVID-19 restrictions, largely through continuous problem-solving, out-of-the-box thinking and flexibility to consider different approaches that in the long-term will deliver similar results. Demonstration projects within the 7 target countries are still expected to be completed by the end of the project cycle. Efficiency was also the result of the learning and experience acquired through the CoPs and information on the KM platform.
183. Financial management and delivery have been efficient. As of 30 June 2021, the June 2021 PIR reported that USD 3,288,467.00 had been disbursed to the project (40% of the total GEF contribution). The Administrative and Financial Officer has demonstrated a solid grasp of the 24 subcontracts and as noted above, has developed detailed forecasts unlike the Review consultant has seen. The materialization of 65.5% of the pledged co-financing has also contributed to increased efficiency of the Project allowing it to plan effectively. Hence levels of expenditure have kept up with the advance of the implementation process.

Table 9: List of SAICM Project Sub-contracts

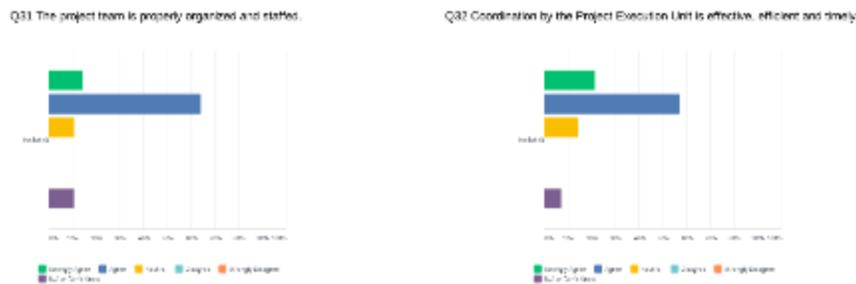
Partner	Agreement	From
C1		
ABA-ROLI	2000000720	20.09.2019
Ecowas	2000001153	18.12.2019
IPEN (Contract 1)	2000000405	10.07.2019
IPEN (Contract 1)	2000002724	16.06.2020
NCPC China	2000000755	30.09.2019
NCPC Jordan	2000000732	24.09.2019
NCPC Peru	2000000701	18.09.2019
NCPC Serbia	2000000032	28.02.2019
WHO	2000000404	10.07.2019
C2		
BCRC China	2000001713	19.02.2020
Bioregional	2000003149	14.07.2020
EL Bosque	2000004377	19.11.2020
ICLEI	2000001899	04.03.2020
NCPC Colombia	2000000566	07.08.2019

NCPC Sri Lanka	2000001000	18.11.2019
UNITAR	2000004300	11.11.2020
UseTox	2000000114	06.03.2019
WRF	2000002035	23.03.2020
C3		
IPEN	See above	
ISSD	2000000464	19.07.2019
UCT	2000002360	30.04.2020
WHO	See above	
C1 – Regional Offices		
RO Africa	ICA	
RO Asia-Pacific	ICA	
RO C&E Europe	ICA	
RO Latin America & Car.	ICA	

184. From a timeline perspective, the Project is still estimated to be completed within 48 months; an impressive feat considering early delays and that the PEU did not fully converge until late 2019. There was also a slow start related to Component 1 as it took several months of implementation time to get governments to fully engage and participate in the Project and build the necessary traction on the drafting of legislation.
185. From a contracting and administration perspective, efficiency was compromised and one of the weaker aspects of operations. Underlying some of these challenges was staff shortages, which might have been offset through, for example, increased cooperation with Regional Offices⁴¹ or more effective use of partnerships, albeit a temporary resource has stepped in from the UNEP CHB to lead Component 1. These delays and challenges with readiness are nonetheless common in GEF projects. The transition towards a new grant management module in UMOJA at the end of 2018 was reported to have resulted in a number of considerable delays in particular with regard to the approval of contractual agreements and disbursement of initial payments to subcontracts. Also, while the decision to establish an LTA for UNEP IT support is probably the correct one, procurement delays at UNON have caused a cascading effect for the SAICM project's migration to a new KM platform, with hosting set to expire in mid-February 2022.
186. The Review consultant's findings are reinforced by the sentiments of stakeholders as noted in Figure 15 below.

⁴¹ **Reflection by the EPA during the review cycle of the MTR final report:** EPA understands the cooperation with regional offices is a delicate and complicated matter. Regional offices usually require staff funding or consultant resources to support any initiatives. This was the case for LiP. Without resources, regional offices have limited capacity to assist. It is not clear that regional offices could have offset lack of staff resources.

Figure 15. Stakeholder Feedback on the Achievements and Results of the SAICM Project



187. The rating for the category of Efficiency is **'Satisfactory'**.

4.5 Monitoring and Reporting

188. A plan consistent with UNEP standard procedures for monitoring and evaluation (M&E) has been proposed in the Project Document. The plan is also in accordance with the GEF Monitoring and Evaluation policy. The evaluation considers that the plan is adequate and allows

for the proper monitoring of progress at the results level. In fact, there will be surplus from the MTR budget based on the value of the Review



“FOR A WHILE AT THE BEGINNING, IT WAS DIFFICULT TO REALLY FIND THAT SPARK AND ESTABLISH A STRONG CONNECTION WITH SOMEBODY ON THE GROUND WITHIN THE RELEVANT MINISTRY BEFORE THE PROCESS COULD KICKSTART EFFICIENTLY”

- STAKEHOLDER PERSPECTIVE FROM MTR INTERVIEW

consultant’s contract and the amount allocated for TE has been overestimated⁴² and should be revisited with UNEP’s Evaluation Office given it will not be done in parallel with the MSP as envisaged, so they can be reprogrammed as needed.

M&E Activity	Purpose	Responsible	Budget (USD)	Time-frame
Inception work M&E activity shop	Review of project activities, outputs and intended outcomes; detailed work planning	EA	Included in staff costs	Within two months of project start.
Inception report	Provides annual progress review and detailed annual implementation and budget planning	EA	Included in staff costs	Immediately following Inception Workshop
Project Steering Committee	The PSC will be held annually, in line with SAICM stakeholder meetings wherever possible (e.g. the Open-Ended Working Group or ICCM). Provides annual progress review and detailed annual	EA	200,000 for 3-4 meetings	At least annually Additional component-specific coordination/ advisory meetings will also be held to support preparation

⁴² The terminal evaluation was to be conducted jointly with the SAICM MSP project, which was to contribute an additional contribution of USD 20,000 to the total evaluation costs noted here.

Table 10: Monitoring and Evaluation Plan				
M&E Activity	Purpose	Responsible	Budget (USD)	Time-frame
	implementation and budget planning, including revisions to key documents such as procurement plans and Risk Table.			of recommendations to PSC.
Ongoing monitoring and gender mainstreaming	This activity will be ongoing to allow continuous monitoring of the execution. The Monitoring consultant will also ensure links are made between SAICM Focal Points, health ministries and environment ministries.	Stakeholder Outreach consultant	15,000	Ongoing
Travel for project monitoring	This will include travel of the Monitoring consultant to Component meetings convened regionally or nationally under Components 1 and 2.	Stakeholder Outreach consultant	15,000	1-2 missions per year, depending on needs e.g. to unlock bottlenecks or support partners
Midterm Review	Reviews progress and draws lessons on implementation issues and impact of project activities to date. Proposes corrective actions as required.	Consultant	40,000	At the midterm of the project
Terminal report	Reviews effectiveness against implementation plan Highlights technical outputs Identifies lessons learned and likely design approaches for future projects, assesses likelihood of achieving design outcomes	EA	Included in staff costs	At the end of project implementation
Independent Terminal evaluation	Reviews effectiveness, efficiency and timeliness of project implementation, coordination mechanisms and outputs Identifies lessons learned and likely remedial actions for future projects Highlights technical achievements and assesses against prevailing benchmarks	UNEP Evaluation Office	80,000	At end of project implementation
Independent Financial Audit	Reviews use of project funds against budget and assesses probity of expenditure and transactions	EA	Included in the UNEP audit	At the end of project implementation
Total indicative Monitoring & Evaluation cost			\$350,000	

Source: Project Document, Table 4 pp. 59-60

189. The Project's Results Framework has been the primary tool to track progress at the results level by the executing agency. While the Results Framework is mostly adequate, it requires revisiting for consistency and over ambitiousness following the

MTR. It is noted that since the arrival of the PEU, it has correctly and satisfactorily monitored implementation and identified deficiencies and the sub-optimal rating for “Monitoring of Project Implementation” is due to the accumulation and persistence of issues during the Project’s caretaker management phase. Furthermore, an overwhelming number of sub-contractors interviewed underscored the out-of-the-box thinking and adaptive management of the component leads in problem-solving the targets within the bounds and restrictions of the Project’s Results Framework.

190. Monitoring was facilitated by verifiably SMART indicators as well as their sources of verification in the Project Results Framework. Realistic assumptions for the project outcomes and outputs have also been identified in this framework, but have not made their way to the Project’s Theory of Change as noted in Section 3 above.

191. Table 11 below, is the culmination of the recommendations made by Review consultant based on a preliminary analysis of the Results Framework in advance of the workshop held on 30 July 2021 (Ref. Annex L), together with subsequent refinements by the wider management team. The suggested revisions should be approved by the PSC and also shared with UNEP’s Project Review Committee prior to their formal adoption.

Table 11: Recommended Revisions to Strategic Results Framework Indicators and Targets

Results Hierarchy	Original Indicator(s) Per Design at CEO Endorsement	Original Target(s) Per Design at CEO Endorsement	Suggested Revision(s) to Indicators and/or Targets	Comments by MTR Consultant
<p>Objective: Accelerate adoption of national and value chain initiatives to control Emerging Policy Issues (EPIs), and contribute to the 2020 SAICM goal and 2030 Agenda for Sustainable Development</p>	<p>Number of countries and companies that have adopted regulatory and value chain initiatives to control EPIs, and to meet 2030 Agenda targets.</p>	<p>Composite indicator (Outcomes 1, 2 and 3) = 40 governments pass lead laws + 50 paint producers + 2 governments with SPP + 26 companies using USEtox/ phasing out CoC. By 2020, at least 2 manufacturers in LMIC demonstrate reduced toxicity of products.</p>	<p>Proposed change to Objective statement: Accelerate the adoption of national and value chain initiatives to control Emerging Policy Issues (EPIs).</p> <p>Proposed changes to indicator: Number of countries and companies that have adopted regulatory and value chain initiatives to control EPIs.</p>	<ul style="list-style-type: none"> This seems like a redundant indicator as it is a rollup of a number of outcome- and output-level indicators. Recommendation to delete altogether unless there is a unique indicator at the objective level that is SMART; Recognizing deleting altogether might not be acceptable to UNEP PRC in which case the proposed revisions are in order; None of the targets or activities

Table 11: Recommended Revisions to Strategic Results Framework Indicators and Targets				
Results Hierarchy	Original Indicator(s) Per Design at CEO Endorsement	Original Target(s) Per Design at CEO Endorsement	Suggested Revision(s) to Indicators and/or Targets	Comments by MTR Consultant
			<p>Proposed changes to targets: Composite indicator (Outcomes 1, 2 and 3) = 40 governments pass lead laws + 35 paint producers + 2 governments with SPP + 26 companies using USEtox/ phasing out CoC. By 2022, at least 2 manufacturers in LMIC demonstrate reduced toxicity of products.</p>	<p>undertaken by the Project explicitly link back to indicator statement “and to meet 2030 Agenda targets” and therefore, it is recommended to delete this as this is a higher order goal;</p> <ul style="list-style-type: none"> Target for the number of SMEs should align closer to the output level and 35 seems realistic in consultation with the PEU, Component Leads and Stakeholders. Since the approach was that SMEs would only reformulate at least 1 of their products through the project, the objective level indicator could be made bolder if at least 50% of the SMEs targeted went on to reformulate other products without the need for the Project’s investment and technical lab assistance.
Outcome 1: Countries legislate and implement legislation to restrict the use	Number of countries with adopted legislation on legal limits to LiP	80 countries by Year 2 (existing champion countries) 110 countries by 2020	<p>Proposed changes to the Outcome statement: Countries adopt and implement</p>	<ul style="list-style-type: none"> Remove reference to the target in the Outcome statement (LiP, 40 countries) and reword Outcome

Table 11: Recommended Revisions to Strategic Results Framework Indicators and Targets

Results Hierarchy	Original Indicator(s) Per Design at CEO Endorsement	Original Target(s) Per Design at CEO Endorsement	Suggested Revision(s) to Indicators and/or Targets	Comments by MTR Consultant
of lead in paint (LiP, 40 countries)			<p>legislation to restrict the use of lead in paint.</p> <p>Proposed changes to indicator: Number of countries with adopted legislation and/or final texts awaiting political validation on legal limits to LiP.</p> <p>Proposed changes to target: 40 countries with adopted legislation or final texts awaiting political validation (including at least 20 countries with adopted legislation)</p>	<p>statement to avoid repetition;</p> <ul style="list-style-type: none"> A target of +40 against the baseline is 108 and not 110. Baseline should be revisited per data in the ProDoc; Targets have been reformulated in consultation with the C1 Component Leads.
	Number of paint manufacturers switching to lead free production	50 manufacturers by 2020 in 8 countries	<p>Proposed changes to indicator: N/A</p> <p>Proposed changes to target: 35 manufacturers by 2022 in 7 countries</p>	<ul style="list-style-type: none"> The 50-manufacturer target is out of synch with the target for output 1.1; Agreed that the Project cannot take credit for progress in Tunisia and therefore, the number of countries should be amended to 7;

Table 11: Recommended Revisions to Strategic Results Framework Indicators and Targets				
Results Hierarchy	Original Indicator(s) Per Design at CEO Endorsement	Original Target(s) Per Design at CEO Endorsement	Suggested Revision(s) to Indicators and/or Targets	Comments by MTR Consultant
				<ul style="list-style-type: none"> Targets have been reformulated in consultation with the C1 Component Leads.
	Number of registered awareness raising events	Partners convene 50 events for International Lead Poisoning Prevention Week as needed	No change	N/A
Output 1.1: Demonstration pilots with paint manufacturers in Small and Medium Sized enterprises executed in eight countries		<p>Mid-term: 8 demonstration pilots finalize national paint sector reviews 4 governments receiving legal drafting support from ABA-ROLI</p> <p>End of project: Pilot demonstrations completed in 8 countries. 8 governments receive legal drafting support from ABA-ROLI and draft legislation. 30 SMEs executed demonstration pilots.</p>	<p>Proposed changes to target:</p> <p>Mid-term: 7 demonstration pilots finalize national paint sector reviews 4 governments receiving legal drafting support from ABA-ROLI</p> <p>End of project: Pilot demonstrations completed in 7 countries 7 governments receive legal drafting support from ABA-ROLI and draft legislation 35 SMEs executed demonstration pilots</p>	<ul style="list-style-type: none"> It is assumed the 8th is Tunisia which is not actively part of the Project per stakeholder interviews. Activities in Tunisia were undertaken in the context of the SwitchMed Programme under the Barcelona Convention; pilot testing completed before project took off and not attributable to Project efforts; 7 governments was a reference to Ecuador, Colombia, Peru, China, Indonesia, Jordan, and Nigeria + Tunisia (the latter should not be counted).
Output 1.2: Policy support and awareness raising		<p>Mid-term: 20 countries receiving drafting assistance. Events convened</p>	No change	N/A

Table 11: Recommended Revisions to Strategic Results Framework Indicators and Targets

Results Hierarchy	Original Indicator(s) Per Design at CEO Endorsement	Original Target(s) Per Design at CEO Endorsement	Suggested Revision(s) to Indicators and/or Targets	Comments by MTR Consultant
generate support for lead phase out		<p>in 15 countries for International Lead Poisoning Prevention Week</p> <p>End of project: 50 countries received legal assistance 20 countries convening events for International Lead Poisoning Prevention Week</p>		
<p>Outcome 2: Governments and value chain actors in the building products, toys, and electronics sectors track and manage chemicals of concern (CoC) in their products,</p>	<p>The number of governments and value chain actors tracking and managing CoC in products</p>	<p>End of Project: (i) 2 governments set SPP and green building code requirements for CoC (Sri Lanka & Colombia) (ii) 6 companies meet SPP CoC requirements (Sri Lanka, Colombia) (iii) 20 companies use USEtox tools to evaluate toxicity (Sri Lanka, China) (iv) 10 companies report toy results on UNEP / CiP portal (China)</p>	<p>Proposed changes to the Outcome statement: Governments and value chain actors in the building products, toys, and electronics sectors track and manage chemicals of concern (CoC) in their products.</p> <p>Proposed changes to the Indicator: None</p> <p>Proposed changes to the Target(s): (i) 1 government with SPP and 1 government with eco-label guidelines; (ii) 3 companies prepared to meet SPP CoC</p>	<ul style="list-style-type: none"> • With respect to target (i) “2 governments set SPP and building code requirements for CoC, The MTR consultant interprets this as an “either/or” situation (Sri Lanka and Colombia mustn’t need to look at both SPP and building code) to meet the end-of-project target; • Adjustment to activities in Sri Lanka warrant being specific on the type of guidelines (eco-label); • In light of USEtox indicator, the toy audit results seem altogether redundant and should be deleted; three sub-targets are sufficient. If this is not

Table 11: Recommended Revisions to Strategic Results Framework Indicators and Targets

Results Hierarchy	Original Indicator(s) Per Design at CEO Endorsement	Original Target(s) Per Design at CEO Endorsement	Suggested Revision(s) to Indicators and/or Targets	Comments by MTR Consultant
			requirements and 3 companies meet eco-label CoC requirements (Sri Lanka, Colombia); (iii) 10 companies use USEtox tools to evaluate toxicity (Sri Lanka, China); (iv) Delete: 40 companies report to results on UNEP / CiP portal (China). Or scale down in alignment with other targets as follows: "By end of project 3 companies in China using tools to establish or advance a chemicals management system".	acceptable then the target should be scaled down to 3 companies (similar to target for Colombia and Sri Lanka).
	The number of trained value chain and government actors providing feedback on use of new tools and guidance (min 30% female)	End of project: At least 30% of 305 individuals trained provided feedback on how they have applied the training on the new tools (100 people, 30 women)	No change	<ul style="list-style-type: none"> Assumed there is no mid-term target as tools and guidance need to be developed first which is after the MTR.
Output 2.1:		Mid-term:	No change	N/A

Table 11: Recommended Revisions to Strategic Results Framework Indicators and Targets				
Results Hierarchy	Original Indicator(s) Per Design at CEO Endorsement	Original Target(s) Per Design at CEO Endorsement	Suggested Revision(s) to Indicators and/or Targets	Comments by MTR Consultant
New tools and guidance to reduce the use of CoCs in the building, electronics and toys sectors		<ul style="list-style-type: none"> Report on CoC and alternatives in building sector (global) Cost benefit analysis for electronics SPP practices (Colombia) 2 regional electronics studies (LAC and CEE) Report on chemical concentrations in toys and regulatory compliance in China <p>End of project:</p> <ul style="list-style-type: none"> Building sector: 3 guidance/ tools: USEtox assessment of building product's impacts on human health, ecotox and other metrics SPP global guidance for building products; Global guide for banks on setting up green mortgages Electronics sector: 2 guidance/ tools: Global guidance of 		

Table 11: Recommended Revisions to Strategic Results Framework Indicators and Targets				
Results Hierarchy	Original Indicator(s) Per Design at CEO Endorsement	Original Target(s) Per Design at CEO Endorsement	Suggested Revision(s) to Indicators and/or Targets	Comments by MTR Consultant
		<p>SPP of electronics (including Colombia pilot case study) Global review of voluntary consensus standards for electronics</p> <ul style="list-style-type: none"> • Toys sector: 2 guidance/ tools: USEtox new model pathways added and tested with manufacturers. Simple training and audit package for SMEs / non-affiliated companies 		
Output 2.2: Training and support for government and value chain actors to trial and adopt new guidance and tools		<p>End of project:</p> <ul style="list-style-type: none"> • Green Building Council/NCPC events = 50; • USEtox Summer School = 20; • FI training = 100 • Toy producers (China) = 50 • Multistakeholder consultations, with Chinese enforcement agency, toy manufacturers and associations = 50; • International consensus building 	No change	N/A

Table 11: Recommended Revisions to Strategic Results Framework Indicators and Targets				
Results Hierarchy	Original Indicator(s) Per Design at CEO Endorsement	Original Target(s) Per Design at CEO Endorsement	Suggested Revision(s) to Indicators and/or Targets	Comments by MTR Consultant
		workshop for electronics = 35		
Outcome 3: A broad group of SAICM stakeholders access information and participate in communities of practice for peer-to-peer learning exchanges	Number of scientific knowledge resources shared with policy makers on EPIs and SDGs	Mid-term: Inputs and commentary by scientific organizations on the 12 project papers accessed by policy makers via SAICM website or meetings End of project: At least 20 science media sources publishing SAICM related content	Proposed changes to the Outcome statement: A broad group of SAICM stakeholders access information and participate in communities of practice for peer-to-peer learning exchanges. Proposed changes to the Target(s): No change	N/A
	Number of active members of KM communities of practice and users accessing information	Mid-term: 4 Communities of Practice (CoPs) established End of project: >100 active members in each CoP with gender balance (minimum 30% women)	Proposed changes to the Indicator: Number of active members of KM communities of practice and users accessing information, disaggregated by sex Proposed changes to the Target(s): No change	<ul style="list-style-type: none"> Level of ambition of targets for Outcome 3 not on par with other Outcomes for C1 and C2.
Output 3.1: Collaboration and engagement with the SDG and scientific communities to promote		Mid-term: Target = 12 papers (5 policy briefs on SDGs 2, 3, 6, 11, 12; 5 thematic papers on water, cities, science etc; 1 gender review	Proposed changes to the Target(s): End of project: 2 project side events (for example at	N/A

Table 11: Recommended Revisions to Strategic Results Framework Indicators and Targets				
Results Hierarchy	Original Indicator(s) Per Design at CEO Endorsement	Original Target(s) Per Design at CEO Endorsement	Suggested Revision(s) to Indicators and/or Targets	Comments by MTR Consultant
EPIs		<p>mapping EPIs and identifying gender priorities; 1 indicators mapping paper reviewing contribution of EPIs to indicators of progress/ impact)</p> <p>End of project: 5 presentations on SAICM at scientific community events 10 presentations at related policy events (biodiversity, cities, food systems etc) 2 project side events at OEWG and ICCM5 12 communications/ content pieces on HHPs, EDC/EPPPs, Lead paint, and CiP</p>	OEWG and ICCM5)	
Output 3.2: Knowledge Management Platform provides a repository of information and forum for exchange of scientific and policy information		<p>Mid-term:</p> <ul style="list-style-type: none"> • 1 SAICM Knowledge Management Strategy • 1 contract in place with web architecture service provider(s) for an integrated platform including spatial and non-spatial data • 5 maps and visual tool prototypes constructed 	<p>Proposed changes to the Target(s):</p> <p>Mid-term:</p> <ul style="list-style-type: none"> • 5 visual tool prototypes constructed and tested; stakeholder s consulted at OEWG3 • Technical content on EPIs produced and submitted by project component 	N/A

Table 11: Recommended Revisions to Strategic Results Framework Indicators and Targets				
Results Hierarchy	Original Indicator(s) Per Design at CEO Endorsement	Original Target(s) Per Design at CEO Endorsement	Suggested Revision(s) to Indicators and/or Targets	Comments by MTR Consultant
		and tested; stakeholders consulted at OEWG3 <ul style="list-style-type: none"> • Technical content on EPIs produced and submitted by project components (on HHP, EDC/EPPP, lead paint and CiP). End of project: <ul style="list-style-type: none"> • 50 knowledge exchange instruments featured on the Platform including 5 maps and visual tools; • Information on 4 EPIs; • CoPs established for each EPI (4 total) 	s (on lead paint and CiP). End of project: <ul style="list-style-type: none"> • 50 knowledge exchange instruments featured on the Platform including 5 visual tools; information on 2 EPIs; • CoPs established for each of the two EPIs and other relevant topics (4 total). 	

192. Reporting cadence and templates have undergone incremental revisions and are of a high quality. Some partners believe that reporting presents a high administrative burden that is not aligned with the dollar values of contracts. It is not recommended to pare down the reporting at this juncture however as it will cause unnecessary disruption and force partners once again to re-adapt at a time when energies should be focused elsewhere.

193. The Project is actively monitoring risks on an ongoing basis adding to a register when new risks emerge. In spite of being designed under GEF-6, the SAICM project is complying with GEF-7 indicators 9.4, 9.5 and 11. It is making progress on all, although core sub-indicators 9.4 and 9.5 do not map fully to the parameters being monitored by the Project; with sub-indicator 9.5 being particularly problematic.

Target already achieved	Target is partially achieved or on-track to be achieved by the end of the project	Target is at high risk of not being achieved by the end of the project and needs attention
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Table 12: MTR Observations on GEF-7 Core Indicators

GEF-7 Core Indicator	Description	MTR Comments
Indicator 9.4: Number of countries with legislation and policy implemented to control chemicals and waste (43)	Component 1 – 43 governments adopt lead paint regulation –	<ul style="list-style-type: none"> 15 governments have adopted legislation as of 30 June 2021; a further 19 countries have advanced drafts of legislation pending adoption. The target of 43 is not aligned with the Results Framework.
	Component 2 – 2 governments set Sustainable Public Procurement requirements for low chemicals use.	
Indicator 9.5: Number of low-chemical/non-chemical systems implemented particularly in food production, manufacturing and cities	Component 1 – logframe target for 50 SMEs to adopt lead-free production	<ul style="list-style-type: none"> 14 SMEs in 8 countries have completed their paint reformulation projects and switched to lead free paint production; Another 22 SMEs are in the process of completing the demonstrations projects for a total of at least 36 SMEs. Target of 50 SMEs is incorrect and not linked to the actual output milestone.
	Component 2 – target for 6 companies to meet SPP requirements, plus 20 companies use UseTox tools, plus 10 toy companies report toys audit tools.	
Core Indicator 11: Number of direct beneficiaries disaggregated by gender as co-benefit of GEF investment	Outcome 1 – 170 participants of lead in paint regional workshops in 2019 (45% female)	<ul style="list-style-type: none"> Reference is made to analysis in tables 6, 7 and 11 for these core indicators.
	Outcome 2 – includes 305 people being trained (min 30% female)	
	Outcome 3 – includes min 400 members of Communities of Practice (min 30% female)	

194. The PSC constituted by the IA, EA, UNEP CHB and RMB, WHO, the Chair of the IOMC, NCPIC Serbia, and relevant national government representatives nominated by the SAICM ICCM5 Bureau was established at the start of the project. The first PSC meeting was held immediately following the Inception Workshop in 2019. During this initial meeting, the project structure, partner roles and responsibilities, project requirements, project budget, and work plan were discussed and reviewed, and agreed upon by all stakeholders. According to information available, action items stemming from the PSC meetings were adequately discussed and monitored during

the subsequent PSC meetings. Timely progress and status reports were provided to the PSC, which meets at least semi-annually as per best practice, although not all PSC members are equally engaged and active. Careful consideration ought to be given to which entities are invited to form a smaller technical committee; with sustainability and the value-added to be central to the thought process.

195. Reporting was very satisfactory. Comprehensive quarterly progress reports as well as PIRs were timely prepared and submitted. Based on these reports, it is clear that project implementation was based on the project logical framework and the indicators proposed therein were used to track progress.
196. The overall rating for the category of Monitoring and Reporting is **'Satisfactory'**⁴³.

4.6 Sustainability and Replication

197. Sustainability is understood to mean the probability of continuation of a project's direct outcomes after the project funding and assistance has ended. The evaluation of sustainability and possibility for replication focuses on the four aspects of sustainability (socio-political, financial resources, institutional framework, environmental sustainability), and then looks at the catalytic role the project played towards possible upscaling and replication.

198. The Review consultant notes that a reliable assessment of prospects for post-project continuity or the replication of best practices may be premature at this stage.

Several outputs and outcomes are still in process of consolidation and will require gestation periods - through piloting and refinement - before results can be demonstrated

(encouraging replication), while others are highly dependent on political processes beyond the immediate

control of the Project. Finally, follow-up / spinoff activities will require a financial envelope for which there is currently no budget. In spite of these disclaimers however, there is evidence the Project is generating the necessary conditions and mechanisms to encourage sustainability post-project. In principle, each individual component could be spun off as discreet projects.

"WE UNDERESTIMATED HOW DIFFICULT IT WOULD BE TO GET ACCESS TO CHINESE COMPANIES IN GENERAL. IT WOULD HAVE HELPED IF THE PROJECT HAD ESTABLISHED DIRECT CONTACTS WITH CHINESE INDUSTRIES AND HAD USE CASES AVAILABLE DURING THE PPG PHASE. ON THE OTHER HAND, SRI LANKA HAS BEEN FORTHCOMING AND TRYING REALLY HARD IN GETTING ACCESS TO VALUE CHAIN ACTORS. NOT SURE IF IT IS THE TOY SECTOR THAT IS CLOSED, OR INDUSTRY IN GENERAL"

"IT TOOK A LONG TIME TO FIND INDUSTRY PARTNERS THAT WERE INTERESTED TO WORK WITH US. IN THE CEE REGION CIRCULAR ECONOMY IS JUST NOT A PRIORITY RIGHT NOW"

- STAKEHOLDER PERSPECTIVE FROM MTR INTERVIEW

⁴³ The ratings for the sub-categories of "Monitoring of Project Implementation" and Project reporting were rated Moderately Satisfactory and Satisfactory, respectively.

199. The MTR considers that there is a high likelihood of post-project sustainability especially at the policy level. The next six months will be critical in consolidating results and the extent to which tipping points can be reached.

4.6.1 Socio-Political Sustainability

200. With the Project having exceeded the MTR target, with 15 countries having passed LiP laws and with a further 19 countries in the late stages of doing so, national governments appear committed. With respect to Component 2, political sustainability is difficult to judge as governments and supply chain actors have yet to pilot the guidance and tools under development. Consultations with stakeholders have surfaced the difficulties penetrating some governments (notably in China and countries in the CEE region) and encouraging their thinking in a manner that supports lifecycle management. Generating conditions of political sustainability therefore, has been slightly more challenging among governments and SMEs for CiP work due to the greenfield nature of the domain; nonetheless strong champions have emerged on this front too.

201. The regional LiP standard for the 15-member ECOWAS economic union has the potential to be a significant catalyst in the African region as a whole and could have a cascading effect. This would be an important legacy for the SAICM project and underscores the need to pay close attention to its success.

202. As noted in Table 5, all the participating demonstration countries have signed and ratified a number of multilateral environmental agreements. These ratifications indicate the strong political will of the respective governments to soundly manage chemicals for the protection of the health of its population and the environment. While it is not possible to foresee the priorities of future governments, there is no particular reason to expect that this will change in the long term.

203. Determining the extent to which the Project can bridge the gap between policy formulation and the implementation of legislation, guidance and tools is at the mercy of the prevailing political landscape and the priorities of governments as national elections and changes of government occur.

204. Social sustainability is very much influenced by public attitudes and their perception of the sound management of chemicals in the context of the SAICM and relevant MEAs. The project has invested significant time and resources into information dissemination and awareness raising. However, influencing the media and court of public opinion will require a more consistent and longer-term strategy than is possible within a four-year initiative. For this reason, the KM platform ought to be embedded into the SAICM strategy going forward and be central to whatever permutation of SAICM emerges from the Beyond 2020 intercessional process.

4.6.2 Financial Resources

205. Within the context of the SAICM's immediate lifecycle, sustainability is dependent on ensuring the project can at least make it to ICCM5 - albeit as a slimmed down outfit and more targeted scope - to present findings and help inform the intercessional

process in the interim. With Project Management costs approaching their cap, this will require careful financial planning and use of resources, and perhaps, consideration of cost-sharing mechanisms with the SAICM Secretariat.

206. Post-project, financial sustainability often depends on continued external support. According to feedback gathered during the evaluation, there is strong support for another initiative to capitalize on the momentum. A number of partners have expressed interest in remaining part of any subsequent initiative, and many believe that key activities can continue in a cost-effective manner. The University of Cape Town for example indicated that it would take a nominal sum (in the range of USD 20k - 30k) to continue the CoP work, the KM platform would require an envelope of approximately USD 50k per year for incremental improvements. Many key partners, such as the USEPA, have been contributing tremendous value without remuneration. However, there is general recognition and appreciation that in the absence of new sources of funding, progress and momentum will wane and eventually stop altogether. The responses from stakeholders clearly indicate that many countries would require financial assistance for continuation of Project benefits.

4.6.3 Institutional Framework

207. From an institutional perspective there were relatively strong conditions of sustainability being generated observed throughout the MTR. For example, transition planning is already very much on the PEU and PSC's radar with exit strategies to be considered at the next PSC meeting. Institutional capacity in most countries is robust enough to continue delivering project benefits beyond the lifetime of the Project, although a new business model for technical support will be needed. The Project's KM platform and CoPs offer the best chances of sustainability so long as these are transitioned into SAICM (or whatever permutation of the framework as part of the Beyond 2020 process). However, ensuring it becomes demand-driven rather than supply-driven will be a specific challenge to solve.
-
- "UNEP SHOULD BE LOOKING TOWARDS SECURING SUPPORT FOR ANOTHER 'PART 2' GEF PROJECT, SINCE THERE IS A LOT OF MOMENTUM THAT WILL BE LOST IF NOT HARNESSSED"
- "AS THE COPS HAVE SHOWN, MANY WOULD BE WILLING TO CONTRIBUTE FINANCIALLY AND THIS COULD BE CHANNLED THROUGH SAICM"
- "IT MIGHT BE WORTH CONSIDERING BUDGET FOR TRAVEL FOR EXPERTS TO GO DIRECTLY TO SMES. VERY OFTEN, NCPC STAFF ARE NOT VERY EXPERIENCED AND THERE IS HIGH TURNOVER. IT WOULD BE BETTER IF WE COULD GO DIRECTLY TO SMES, AND TALK TO THEM. IF OUR EXPERTS VISIT A COMPANY USUALLY THE PROBLEM IS SOLVED IN SHORT ORDER"
- "IT IS NOT NECESSARILY AN ADVANTAGE TO CONTINUE THE PROJECT, BECAUSE IT INTERFERES WITH THINKING ABOUT OTHER SOURCES OF FUNDING. STRETCHING THE SAME AMOUNT OF FUNDING OVER A LONGER PERIOD IS NOT AN ADVANTAGE"
- STAKEHOLDER PERSPECTIVES ON SUSTAINABILITY FROM MTR INTERVIEW**

Figure 16. Stakeholder Feedback on Institutional Sustainability



208. The above responses from the online questionnaire allude that institutional capacity in most countries is robust enough to continue delivering Project benefits beyond the lifetime of the Project, provided that there is adequate provision of financial resources.

209. The MTR draws attention to the following opportunities to enhance institutional sustainability:

- The creation of a transitional technical committee of selected individuals who, through the necessary credentials and expertise, can help to support and reshape the Project into any subsequent phase(s). It would operate in parallel to the current PSC;
- The [World Future Council](#) - with the USEPA's engagement - could be willing to help with global mandate;
- The Lead Paint Alliance business plan and 2023 targets could be a logical hook for expanding efforts beyond the Project;
- The [World Coatings Council](#) – as a forum for information exchange and cooperation on the major issues and priorities facing paint and printing ink industries;
- The Project has been successful in getting 15 regulations approved by government with 19 more in the pipeline. As a result, there are already visible signs of impact of the Project. Some manufacturers have already shifted production to reformulations of at least one product and are making use of third-party certification systems to confirm that their products contain less than 90 ppm lead;
- There are another seven political and economic unions in Africa, including the East African Community, Arab Maghreb Union, Economic Community of Central African States, Inter-Governmental Authority on Development, Community of the Sahel-Saharan States and the Common Market of Eastern and Southern Africa that could follow-suit if the ECOWAS standard has a cascading effect across Africa;
- The MTR notes USEtox[®] is a sustainable model as long as the center is in place, which is tied to various researchers around the world. USEtox[®] is not a business model or tied to a project, but rather to advancing science through an international team of researchers;
- Active engagement of the international legal community, including various committees in ABA and ABA's pro bono law firm advocates, INECE, UNEP Law Office, (& UNDP's network of legal experts) could foster sustainability.

4.6.4 Environmental Sustainability

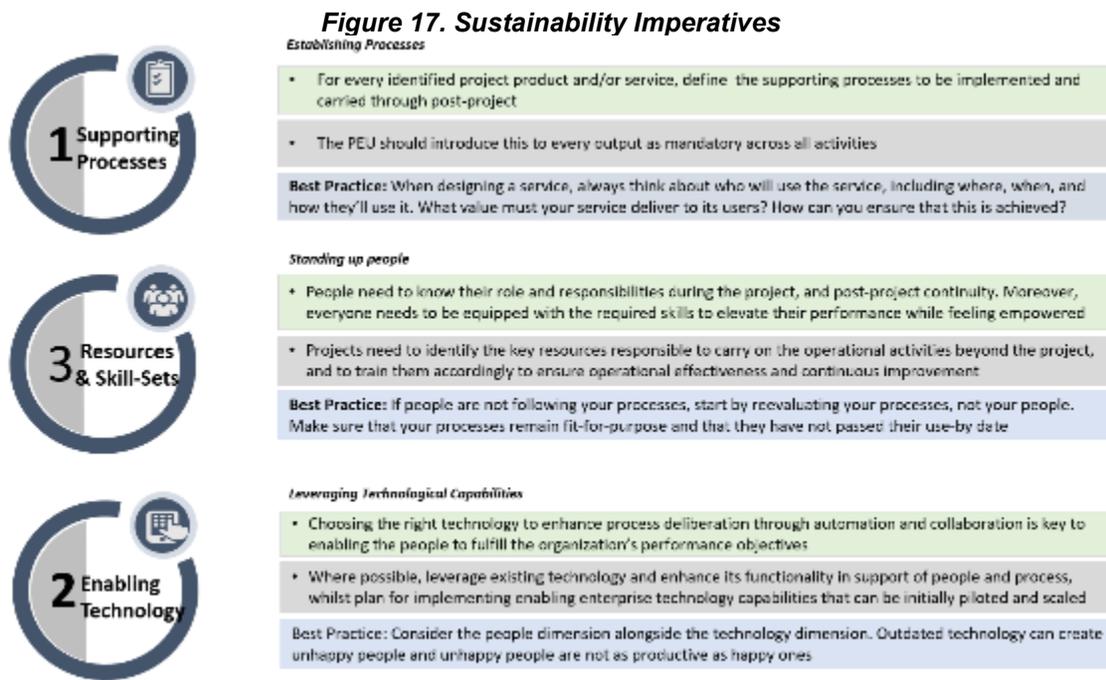
210. One of the reasons for having sound chemical management systems and lifecycle assessment is to protect biodiversity and the natural environment. However, at present the Project has neither had a measurable environmental effect or clear attribution to environment sustainability due to the significant cost associated with doing any kind of systematic ecological monitoring of contaminants in the natural environment within the scope of the Project. Furthermore, the source-pathway-receptor model is the basis for justifying the kind of upstream interventions of the Project and it is assumed that if SMEs / governments actually phase out lead or other contaminants, then environmental benefits will automatically accrue.
211. There are no environmental risks that affect the sustainability of results, outside of the continuation of the current COVID-19 pandemic or new zoonoses emerging that might disrupt the continuity and completion of activities.

4.6.5 Catalytic Role, Replication and Up-scaling

212. Replication is usually inspired by implementation and validated experience. The MTR did not come across examples of replication, and it may be too early to look for this. For Component 1, the catalytic potential played by the Project stems from the momentum generated by the approval of legislation across 40 countries and any cascading effects that are expected to follow. The value of the Project's catalytic role for Component 2 will appreciate considerably when the guidance and tools are considered by governments and piloted. Through the CoPs, the KM platform has brokered scientific, technical and public-private partnerships that built on existing institutional networks and collaboration processes.

4.6.6 Key Elements to an Effective Sustainability and Transition Strategy

213. As noted in Figure 17 below, the cornerstone to sustainability is defining people, processes and technologies for each good and service produced by a project.



214. A “last mile strategy” is required to position any project for a responsible exit. Elements of a robust exit / transition strategy include: (i) an articulation of what sustainability factors need to be addressed; (ii) the objectives that specifically contribute towards achieving this; (iii) indicators or metrics for monitoring progress post-project; (iv) an indicative time scale of when exit will happen; (v) the type of exit⁴⁴; (vi) who will continue activities; (vii) criteria that will need to have been met to allow a responsible exit; and (viii) evidence that the exit strategy has been developed in consultation, and shared, with key partners.

215. The rating for the category of Sustainability is **‘Likely’**.

4.7 Factors Affecting Performance

4.7.1 Preparation and Readiness

216. The Project Document proposed relevant and precise information to allow for the achievement of objectives. It was developed through an exceptionally strong consultative process involving governments, intergovernmental agencies, civil society, industry and experts, which built ownership around the core objectives, methodologies and tools to be applied. This also paid dividends in co-financing.

217. The approach outlined in the Project Document offered satisfactory levels of preparation and readiness that were subsequently weakened by extended delays in

⁴⁴ Including transition into a second phase, external spin-offs, handover to partners, Full stops and absorption into existing business units and the operations of organizations.

the slow start-up. The Project's objective and main components were clearly articulated. However, the general objective and some outcomes and outputs, as noted throughout this report, were outside the Project's control and conditioned by external variables.

218. There was an adequate mapping of stakeholders and identification of key ones with proper description of their roles and responsibilities. Communication and cooperation between members of the core management team and the GEF Task Manager was highly satisfactory and there was no major issue in that regard. Staffing was not optimal in the beginning but improved. The amount contributed or pledged by the donors (both from the GEF Trust Fund and co-financing) decreased by more than half with the elimination of the HHC component. Signing of legal agreements with recipient countries took longer than initially expected.

219. There were also aspects of the Project's design and start-up that - in hindsight - reflected a lack of foresight and preparedness:

- Misunderstandings occurred of the requirements and what is generally involved in implementing GEF projects, as well as level-setting expectations on how finances ought to be managed according to UNEP procedures. Generally, there is a need across the board to demystify GEF projects as these are not always aligned to those executed in the private sector and by CSOs;
- Misalignment between accounting systems and the way expenditures have been recorded have led to an accumulation of problems and would have benefited from some up-front training;
- No changes were made to Results Framework at the inception stage which led to an accumulation and persistence of reporting issues and discrepancies in targets;
- The recruitment of project personnel activation of contracts was very slow in some cases.

220. The rating for the category of Preparation and Readiness is '**Satisfactory**'.

4.7.2 Quality of Project Implementation and Execution

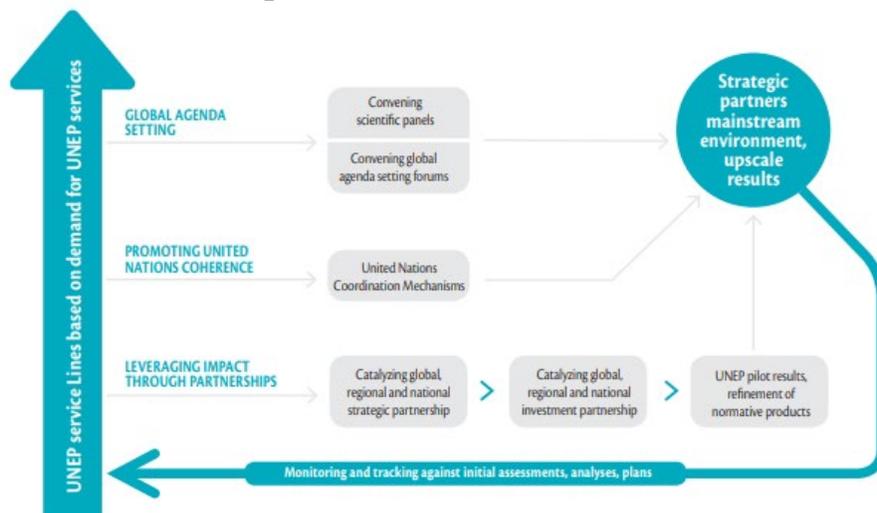
221. The Project's implementation approach and management performance were its main strengths. The implementation arrangements described in the Project Document were followed and complemented by adaptive actions that helped achieve outputs. Optional approaches were considered to secure the approval of LiP legislation and to ensure the CiP component was pragmatic and increased the likelihood of governments and value chain actors adopting guidance and new tools. In general, the Project team's management performance and the support provided by executing partners and technical experts were of high quality.

222. The decision to focus heavily and allocate a large proportion of Project funds on in-country training, technical assistance and capacity development enabled the Project to reach a broader audience and has raised institutional support for the Project on both LiP and CiP fronts. Interviewed participants consistently praised the quality and organization of the training offered by the Project.

linkages and participatory dynamics that are essential to advance sound management of chemicals in the domains of LiP and in supply chains for toys, electronics and building materials. The Project foresaw the indispensable role of NCPCs and IPEN and other partners in the implementation of activities, as well as the role of entities such as the Lead Paint Alliance, IOMC, and others would have on sustainability to carry forward the momentum generated.

- 228. The Project has successfully engaged the category and number of stakeholders identified in the Project Document, in some cases performing additional due diligence and inviting more partners such as Bioregional, El Bosque University, World Resources Forum and ICLEI for their added value and thought leadership.
- 229. The PSC and their national counterparts were the Project’s primary decision-making bodies and vehicles for ministerial cooperation at the national level and enabling public-private partnerships with supply chain actors. They have played an important supportive role. Decisions on budget revisions within acceptable thresholds, project extensions and project implementation guidelines were consulted with and endorsed by the PSC and where relevant discussed through governance structures established to support national demonstrations.
- 230. The comparative advantage of UNEP lies in its leading role on the environment; its capacity to convene and build consensus at all levels of governance, its key role in interagency mechanisms, including the Environmental Management Group, and in promoting the progressive development of environmental laws. UNEP also has a strong history of helping governments to strengthen their institutions and systems, including for the development and implementation of national legislation, increasingly embedding gender considerations into its work. With chemicals and waste projects under-represented in the GEF portfolio, sustainability and replication will rely heavily on the ability of UNEP (and its GEF team) to disseminate the tools and guidance among projects that are in the pipeline, under gestation and under implementation, where appropriate.

Figure 20. UNEP’s Business Model



Source: UNEP *Medium Term Strategy* (2018-2019), page 50.

231. The MTR findings indicate that there were high levels of participation and cooperation in the implementation of demonstration and technological assistance projects. In spite of COVID-19 the Project made best use of online tools in lieu of face-to-face contact. There is no longer a need for the GEF Task Manager to participate in monthly meetings as delivery concerns have subsided and the core management team has a strong vision and the capability to implement remaining activities; participation is more appropriate on a quarterly basis. The MTR finds that more participation from national governments invited to participate in the PSC would be beneficial so it is not only the usual suspects contributing.

232. The rating for the category of Stakeholder Participation and Cooperation is '**Highly Satisfactory**'.

4.7.4 Responsiveness to Human Rights and Gender Equity and Environmental and Social Safeguards

233. While the Review consultant is not a gender or human rights expert, a superficial and non-specialist analysis concludes the Project has gone to great lengths to ensure that a gender responsive lens guided implementation. The Project has been cognizant and took every opportunity to underscore how chemicals affect men and women differently and highlight the effects on vulnerable groups such as children and the urban poor.

234. Under Component 3, the following was undertaken:

- Two discussions on gender were facilitated through the CoPs as follows:
 - **26 August 2020:** Gender and sound management of chemicals and waste: Gender and the SAICM Emerging Policy Issues;
 - **30 September 2020:** Brainstorming implementation of gender mainstreaming into national policies for the sound management of chemicals and waste.
- A [report was commissioned and developed by IPEN](#) - per a MoU between UNEP and IPEN executed in 2017 - to show the impact chemicals have on women as a vulnerable group highly exposed to hazardous chemicals and gender inequalities related to decision-making around the management of chemicals and waste. The report also means to provide concrete steps that can be taken to safeguard the health of women and empower women in decision-making in their roles as agents of change. The overall objective is to provide evidence to all stakeholders working towards sustainable development of the importance of addressing this issue for achieving the 2030 Sustainable Development Goals.

235. While the Project has done a commendable job in reflecting gender in activities and collecting gender disaggregated data from workshops and training sessions, there is no gender strategy and plan governing the Project. It is encouraged that the PEU creates a plan based on the Section A.4 of the Project Document articulating the vision of how gender equality and women's empowerment issues were to be mainstreamed into implementation and monitoring, considering the differences in needs, roles and priorities of women and men.

236. The aspect of human rights, indigenous peoples, environment and social safeguards were not substantively covered in the Project design. However, this is not considered an oversight by the MTR given the nature of the project, which is aiming at eliminating the use of lead in paints and chemicals in products. In achieving success, the Project results and outcomes would be beneficial to all the population of the participating countries including indigenous peoples, with benefits to ecosystem goods and services. Notwithstanding, the PEU should revisit the Safeguard Risk Identification Form to close any documentation gaps in advance of the TE.

237. The rating for the category of Human Rights and Gender is **'Highly Satisfactory'**.

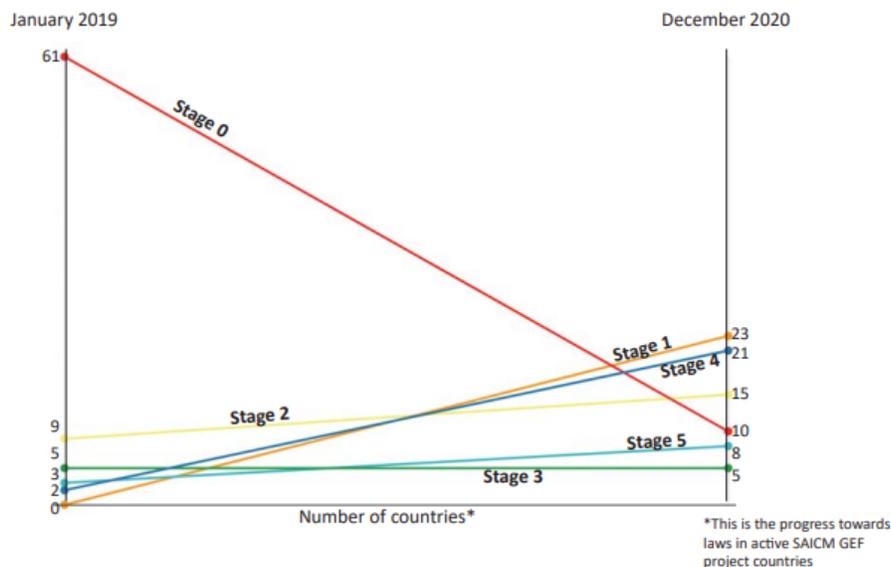
238. The rating for the category of Environmental and Social Safeguards is **'Satisfactory'**.

4.7.5 Country Ownership and Driven-ness

239. The Project implementation approach and participation mechanisms provided enabling conditions for national ownership. Ownership was carefully nurtured and purpose-built from the PPG phase with government partners as well as with research institutions, universities and enterprises with supply chain footprint. Country coordination responsibilities were assigned to NCPC and IPEN (and their partners) many of them located within environmental ministries, universities and CSOs.

240. The tools and approaches noted in the Project Document on LiP and the creation of a continuum to inform decision-making on which countries to focus on reinforced country ownership.

Figure 21. Stages of Lead Paint Laws



Source: [2020 Global Status Update](#)

241. Both the Review consultant and stakeholders interviewed believed the same level of due diligence and prioritization would have been helpful for Component 2 on CiP, as it was difficult to establish connections with industry and this work consumed a lot of the Project's time. The decentralized model was not without flaws as it exposed the Project to risk as illustrated with the dissolution of NCPC Colombia.
242. The rating for the category of Country Ownership and Driven-ness is **'Highly Satisfactory'**.

4.7.6 Communications and Public Awareness

243. As discussed in the section *achievement of outputs*, the Project has been very successful in carrying numerous awareness raising activities in the form workshops, meetings, side events at OEWG3, participation at scientific conferences, and distribution of awareness materials and technical guidance in draft form, as well as more than 112 stories on SAICM, SAICM EPIs, and chemicals published on the IISD SDG Knowledge Hub and in the SAICM KM platform - <https://saicmknowledge.org/blog>. The Project also supported and contributed to ILPPW events; a main conduit for generating national interest in LiP laws. The impact of these awareness raising activities was immense that produced visible and tangible results such as adoption of regulation on lead in paint, shifting towards lead free paints by manufacturers, and progress towards heightened awareness on CiP from a supply chain perspective. Another key tool of note is the [SAICM map](#) of lead paint laws.
244. The MTR is of the view that while communication and awareness has been successful in accelerating knowledge on EPIs among target audiences, it is too early to judge the effectiveness on raising public awareness and bringing discussion of CiP to the public consciousness which would be a key tipping point.
245. The rating for the category of Communications and Public Awareness is **'Highly Satisfactory'**.

5. Conclusions, Lessons and Recommendations

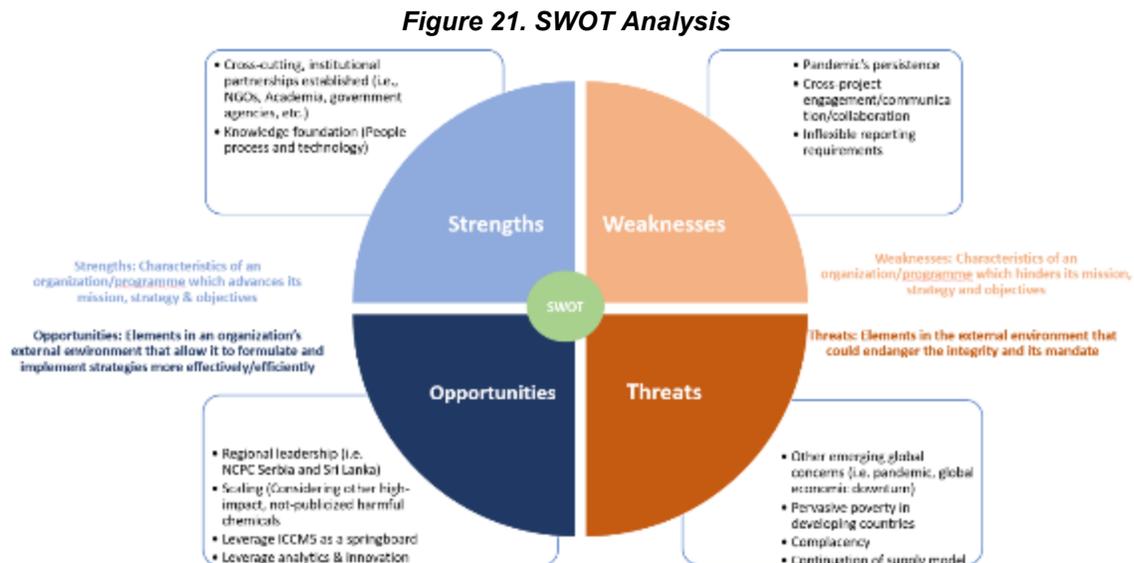
5.1 Conclusions

246. By its nature, and according to the requirements defined in the ToR, this Mid-Term Review has followed a rigorous and exhaustive process to gather and analyse extensive data, in order to obtain fact-based evidence that is both credible and reliable, as well as support utilization-focused outcomes. Through this process, a detailed, objective, and accurate view of the project progress to-date has been obtained.
247. At its core, the project was designed to accelerate the adoption of national and value chain initiatives to manage Emerging Policy Issues by promoting regulatory and voluntary action by government and industry to phase out lead in paint, lifecycle management of chemicals present in products, and knowledge management and stakeholder engagement and contribute to the 2020 SAICM goal and the 2030 Agenda for Sustainable Development.
248. The SAICM project has made inroads to fast-tracking the adoption of laws where it saw an opportunity and where conditions were ripe to do so, using a Model Law and Guidance to promote and guide national law drafting efforts, and to provide technical guidance to enterprises to help them through the reformulation process and connect them to alternative pigment suppliers. It also involved breaking new ground for the toy, electronics and building sectors by taking a supply-chain focus and creating new tools and guidance that can be leveraged by government. It also sought to raise awareness by dovetailing on existing events such as ILPPW and by facilitating conversations on different facts of the risk of exposure to lead and the importance of taking a supply-chain approach on sound management of chemicals throughout their entire lifecycle. The latter was facilitated by 4 Communities of Practice and curated content on beta KM platform that is being relaunched in early 2022.
249. The MTR concludes that the SAICM project has been a foundational and effective initiative to date and by every measure, has indeed been successful in accelerating the adoption of national and value chain initiatives to manage Emerging Policy Issues and contributing the 2020 SAICM goal. The extent to which the Project has also contributed to the 2030 Agenda could not be measured however, largely due to insufficient metrics and attribution per its design.
250. The implementation approach and institutional arrangements were innovative and have methodological value for future projects. In fact, each of the components have replication potential themselves and can be spun off as discreet individual projects. The linkages with existing initiatives, tools and consortia were fundamental in driving the adoption of legislation and ensuring there was at least a starting point for the ground-breaking work on CiP. These also have high sustainability value post-project, encouraging continuity through national partner institutions.
251. At both the outcome and output level, the project attained most of its mid-term targets as noted in Tables 6 and 7 respectively and in some cases with respect to outcome 3 has either achieved or is closing in on the end-of-project targets. The results

were achieved through the combination of on-site demonstration, capacity building and peer-to-peer learning to underscore the catalytic value of the project’s intervention logic. From a sustainability perspective, the Project has / is actively considering the enabling conditions to sustain momentum.

252. As expected at mid-term, activities cannot be expected to be finalized. The following investments planned for the tail end of the Project’s implementation are critical and will determine the extent to which its outcomes will ultimately be achieved: (i) special attention must be paid to accelerating work on and finalizing the LiP standard for the ECOWAS region. The ambition of the 40-country target is inextricably linked to the 15 member states passing the LiP standard; (ii) approvals of technical guidelines and market-based incentives for supply chains in the toy, electronics and building sectors, many of which are slated for finalization in Q4 of 2022. This is a key dependency for them to be piloted in the target countries and to surface opportunities for replication and increasing the ambition of and compliance with regulatory requirements on CoCs; and (iii) positioning the migration to a new KM platform to serve a broader and longer-term purpose to justify investments at this juncture in the Project’s lifecycle.

253. The following is a summary of the Strengths, Opportunities, Weaknesses and Threats based on the MTR’s analysis and findings:



254. The ratings of the different evaluation aspects related to project implementation are summarized in the following table, with an overall rating of the Project as Highly Satisfactory.

CRITERION		RATING
A. Strategic Relevance	The Project is complementary to UNEP’s Subprogram 5, is consistent with the Chemicals Focal Area of the GEF. It is also complimentary to larger global efforts through existing consortia	Highly Satisfactory
i. Alignment to UNEP’s MTS, PoW and		HS

Table 13: Details of Project Ratings		
CRITERION		RATING
strategic priorities	such as the Lead Paint Alliance, IOMC and the SAICM to promote the sound management of chemicals.	
ii. Alignment to Donor/GEF/Partner strategic priorities		HS
iii. Relevance to regional, sub-regional and national issues and needs		S
iv. Complementarity with existing interventions		S
B. Effectiveness	Progress towards the availability of outcomes and outputs suggest the Project is on track to meeting its stated objective, and is generating the enabling conditions and mechanisms to sustain them. For Component 1 visible signs of impact are evident with the adoption of legislation in 15 countries. A measurable impact for the CiP component will require the broader adoption new tools and guidance and continued support for training and demonstration of the value-added of a supply chain focus in key industries. The agile approach taken by the Project on the KM platform for Component 3 is reflective of the seasoned management and has allowed for relevant information to be accessed relatively quickly by key stakeholders. There is certainly an emphasis on quality in terms of the resources that have been posted. The overall quality and effectiveness of project implementation was impressive and reflected a commendable performance by the wider management team and cadre of capable partners, despite asymmetrical implementation processes between countries and differences in institutional capacities.	Highly Satisfactory
i. Availability of Outputs		S
ii. Achievement of Project Outcomes		S
iii. Likelihood of Impact		HL
C. Financial Management	Financial sheets as well as other financial information made available to the Review consultant. Strong communication between finance and project teams. Impressive depth and knowledge of UNEP and GEF policies, however, applying these stringently and inflexibility was a pain point for many sub-contractors who have never been involved in a UNEP-supported GEF-financed initiative before. At the component level, communication left out project partners that needed to know where there were gaps. No overall coordination to make sure funds were being spent where they needed to be. Financial information could have been more	Highly Satisfactory

Table 13: Details of Project Ratings		
CRITERION		RATING
	effectively transmit this information to all the LIP partners.	
D. Efficiency	<p>Quality outputs have been delivered within planned budget and timeframe. Monitoring, communication, adaptive management and “quality control” applied by the core management team were drivers of project efficiency, and contributed decisively to successful implementation.</p> <p>Typical of projects administered by UNON, there were administrative delays in the approval of contracts, compounded by new requirements for grantees in Umoja that very few were trained in and late disbursements that affected some of the demonstration activities and ramping up of operations.</p>	Satisfactory
E. Monitoring and Reporting	<p>Adequate logframe with SMART indicators proposed and monitoring and evaluation properly budgeted. There is evidence that the EA depended on the Results Framework heavily for monitoring progress at results level. Reporting was satisfactory and in line with requirements. Risk management was exemplary and done regularly as part of PM processes. Accumulation of misalignment of targets and sloppiness within the Results Framework took away from stronger results in this criteria.</p>	Satisfactory
i. Monitoring of Project Implementation		MS
ii. Project Reporting		S
F. Sustainability	<p>The Project is cognizant of the need for sustainability, which is also built into its design. There are also strong prospects for replication and upscaling, with the potential to provide major global environmental benefits and best practices to enhance sound chemicals management.</p> <p>Strong ownership from stakeholders and natural partners to take this forward, no particular reason to expect that this will change in the future. Regulation has been (or will be) adopted through legislation but would require to put in place the adequate enforcement system. There is consensus on the need for a follow-up project though financial resources have not been secured.</p> <p>Each component of the Project has the potential to be spun into an individual project that can also be developed and implemented independently. Continued technical support and funding is needed to consolidate institutional capacities for continuing the momentum on helping more countries pass LiP legislation and having the right</p>	Likely

Table 13: Details of Project Ratings		
CRITERION		RATING
	backstopping model for the eventual implementation of supply chain tools.	
G. Factors Affecting Project Performance and Cross-Cutting Issues		Highly Satisfactory
i. Preparation and Readiness	<p>Key partners already involved in similar initiatives prior to the project. The objectives and roles of partners were clearly explained during the inception workshop which took place within the mandated time period.</p> <p>As noted above, signing of legal agreements with recipient countries took much longer than initially expected and was a bottleneck to starting activities before 2019. There were high levels of preparedness insofar as institutional arrangements were built around existing networks and collaborative processes, facilitating the Project's insertion at the country level and ensuring coherence with ongoing initiatives and institutional priorities.</p>	S
ii. Quality of Project Implementation and Execution	The Project's implementation approach and institutional arrangements were key contributing factors to project performance. The implementation strategy was well conceived and deviations thoroughly discussed prior to their adoption. There is a good relationship, cooperation and open lines of communication between the members of the wider execution team (PEU and component leads) and GEF Task Manager; reinforced by a regular meeting cadence that has served the Project well. Staffing of the SAICM project improved as work progressed and is now in line with the Project's implementation structure approved by the PSC at its first meeting.	HS
iii. Stakeholder Participation and Cooperation	<p>The Project's strategy and its ultimate success, was predicated on an unprecedented degree of collaboration between members international MEAs and multi-sectoral / multi-stakeholder policy frameworks such as SAICM, international coordinating groups such as the IOMC and Lead Paint Alliance, the private sector and civil society.</p> <p>Level of engagement of key stakeholders especially the paint manufacturers was strong, although it was difficult to penetrate some industries (i.e.: the toy sector) in specific countries.</p>	HS
iv. Responsiveness to Human Rights and	While the aspect of human rights was not mentioned in the SAICM project document, the	HS

Table 13: Details of Project Ratings

CRITERION		RATING
Gender Equity	involvement of women and gender considerations in planning of activities and in thematic discussion on SDGs factored strongly and was highly satisfactory.	
v. Environmental and Social Safeguards	The Project is encouraged to undertake the SRIF going forward. Environmental and Social Safeguards was not directly applicable to the Project's design and intervention logic.	S
vi. Country Ownership and Driven-ness	The implementation model of the SAICM Project, which meant working through the national NCPCs, IPEN and Regional Centres, fostered a high degree of ownership and country driven-ness in the recipient countries.	HS
vii. Communication and Public Awareness	Numerous public awareness activities have been undertaken in all countries. Awareness has been raised at all levels through training and events. The KM platform and CoPs have helped elevate chemicals management among targeted audiences.	HS
Overall Project Rating		Highly Satisfactory

5.2 Lessons Learned

255. The MTR finds the following emerging lessons generated from the review of the documents and consultations with the project stakeholders:

Lesson 1: Leveraging existing networks and having natural partners to carry work forward post-project is a critical element of sustainability.

Lesson 2: Engaging knowledgeable stakeholders with complimentary strengths and experience in communication and information strategy, as well as tried and tested methods are essential components of Knowledge Management when standing up new platforms.

Lesson 3: Rolling up indicators at the objective level as opposed to developing unique indicators opens up room for error and misalignment. Monitoring progress at the results level rather than at output level is an approach that ensures success, and achievement of project goal and impact.

Lesson 4: It is important that a project's design and timeline reflects national constraints and the potential disruption caused by national elections and administrative procedures of economic and political unions.

Lesson 5: The inception period is very valuable – allow sufficient time. It helps to demystify the expectations of GEF projects and determine if guidance can be provided from GEF or the GEF Implementing Agency on how to manage a big project. All expert

partners should be involved in the inception period to help them understand how the project works.

Lesson 6: Inclusivity and consultative project design can lead to very tangible and real co-financing commitments.

Lesson 7: Project “Champions” and “Change Agents” play a significant role in project success and furthermore, are instrumental to project replication and sustainability efforts.

Lesson 8: While GEF projects must be ambitious to achieve global environmental benefits, they should also balance and take into consideration the sphere of influence of the management teams that implement them so as not to set unrealistic expectations and targets.

5.3 Recommendations

256. This section presents a series of recommendations that have emerged as a logical result of the analytical work conducted during this MTR. The identification of weaknesses or barriers occurring during implementation naturally leads to recommendations for measures to address those deficiencies. Similarly, the identification of actions where the project has performed strongly, leads to recommendations for continuing and broadening these actions. Because these recommendations come at project mid-term, this information provides a unique opportunity: it can be used as part of an adaptive management “feedback loop,” to guide mid-course adjustments, which can ultimately strengthen the Project, resulting in a higher probability that the overarching project goal and objective will be achieved.

257. The recommendations which have evolved out of the MTR process, and which are presented in this report, are grouped into two categories: corrective, and augmentative. The corrective recommendations are those which are meant to provide a means for strengthening or putting back on track those aspects of the project which have shown deficiencies, or which have met persistent obstacles that have hampered successful implementation. The augmentative recommendations are those which are intended to expand upon, strengthen, or replicate project actions which have shown relative success thus far in achieving project results (or leading in that direction).

258. To summarize, the MTR has recommended 13 corrective actions (of which 9 are High Priority, 2 Medium Priority and 2 Low Priority), and 3 augmentative actions (of which 1 is High Priority and 2 Medium Priority) to be considered by the SAICM project. Although there are 16 actions listed below, some will be relatively easy and quick to complete, while others are more complex and will require more time and resources.

Table 14: List of Recommendations

No.	Recommendation	Type (Corrective / Augmentative)	Indicative Timeframe	Responsible
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Design and Strategy				
I.	Following the MTR, a new Results Framework should be adopted based on the recommendations and outcomes of the joint workshop during the review, with proposed adjustments to targets and indicators approved by the Steering Committee at its next meeting	Corrective High-Priority	Near-term (0-3 months)	PEU + Component Leads, Task Manager, UNEP PRC and PSC
II.	Work on an exit strategy and transition plan for each of the goods and services developed under the SAICM project should be expedited. A dedicated agenda item should be tabled to work through the particulars at the next Steering Committee meeting.	Corrective High-Priority	Near-term (0-3 months)	PEU + Component Leads and PSC
III.	Stakeholder interviews and the online survey circulated during the MTR surfaced the near unanimous view that there is value in the Project presenting at ICCM5 when it is scheduled. Therefore, it is recommended that the SAICM project be extended, albeit with a smaller subset of motivated partners instrumental during the Project's critical transition phase, and with a more targeted scope of Knowledge Management and training of government and value chain actors on being able to piloting and use of guidance tools. An extension would serve the Project well to not only allow critical work envisaged in the design to be completed but also ensure that higher order results to accrue.	Corrective High-Priority	Medium-term (3-6 months)	PEU, UNEP Task Manager, GEF Secretariat
IV.	If the SAICM project is not extended beyond its operational closure in end-2022, a thorough communication and transfer of any results from this project with relevance to Resolution IV/4 of the SAICM framework should be pursued with high priority. Surplus funds - from unspent travel costs or the Terminal Evaluation (TE) - should be used strategically to support sustainability of results and transitioning.	Corrective High-Priority	Medium-term (3-6 months)	PEU + Component Leads, Task Manager and PSC / Technical Committee*
Governance				

V	The PSC ought to dive straight into discussing and resolving issues at its meetings as opposed to sitting through passive status updates. Also, a smaller subset of the PSC ⁴⁵ should meet more frequently to work through substantive and technical issues and specifically help to operationalize the transition plan in parallel to implementation during the remainder of the Project. This “technical committee” ought to be purpose-built with sustainability and replicability in mind.	Augmentative High-Priority	Near-term (0-3 months)	PEU + Component Leads, Task Manager and PSC
VI	With concerns and implementation issues that plagued the Project at the outset now resolved, there is no longer a need for the GEF Task Manager to participate in monthly meetings with the management team; instead they can convene quarterly moving forward;	Corrective Medium-Priority	Near-term (0-3 months)	PEU + Component Leads
Financial Management and Planning				
VII	The Project should undertake a thorough budget revision following the MTR in order to (i) reallocate unspent travel funds due to the COVID-19 pandemic to strategic priorities identified through the MTR; ii) reprogram services that were supposed to be provided to the Project (i.e., technology advisory support from MapX on the KM platform); and (iii) streamline the budget (i.e., consolidating budget lines) where possible to facilitate reporting among partners. It is also recommended that surplus funds also be used to translate technical guidelines and other communication and dissemination activities that are currently not slated for translation.	Corrective High-Priority	Near-term (0-3 months)	PEU, Task Manager
Component 1				

⁴⁵ While this is already happening organically, through the Lead Paint Component Global Team, where NCPC Serbia, WHO, USEPA & UNEP (PSC members also take part), discuss substantive and operational issues on the LiP work, it should be more explicit and focus on business continuity post-project.

VIII	The Project needs to pay close attention to monitoring progress of the regional standard for the ECOWAS region, and double down on facilitating, providing additional support, or accelerating work where possible. With the potential of gaining legislative support among its 15 member countries, all of which do not currently have a lead paint law, the realization of Outcome 1 hinges on the success of this deliverable.	Corrective High-Priority	Near-term (0-3 months)	PEU + Component Leads
Component 2				
IX	The Project must double down on expediting the finalization of new guidance and tools for the, toys and electronics sector, to allow sufficient time for their piloting and to train a critical mass of government and value chain actors.	Corrective High-Priority	Near-term (0-3 months)	PEU + Component Leads
Component 3				
X	For near-term investments on the KM platform to be worthwhile in the time remaining, the KM platform must be embedded to fulfill the strategic objectives of the SAICM framework in the Beyond 2020 process. In addition to the current migration costs, the management team along with the SAICM Secretariat must consider an adequate funding envelope for ongoing support and enhancements. Furthermore, to ensure sustainability, the SAICM Secretariat and management team should consider and explore the KM platform's potential to facilitate technical and scientific cooperation through a help-desk service, modeled after the United Nations Framework Convention on Climate Change (UNFCCC) Technology Mechanism's Climate Technology Centre and Network (CTCN) and the CBD's Bio-Bridge Initiative .	Corrective High-Priority	Medium-term (3-6 months)	PEU, EA
XI	A conscious effort and investments made to increase LMIC representation and participation in the KM platform. It is also recommended to increase the level of ambition of the targets under Component 3 to	Corrective High-Priority	Medium-term (3-6 months)	PEU, EA

	reflect the need to target LMICs in the time remaining.			
Component 3				
XII	Frequently scheduled (semi-annual), regimented, real-time updates on progress that are open to all stakeholders, including the PSC, should be recorded and posted on saicmknowledge.org.	Augmentative Medium-Priority	Near-term (0-3 months)	PEU
XIII	The Project should align on and clearly communicate the official close of operations as different documents such as the PIR and Internal Agreement (as well as GEF guidelines) are not consistent.	Corrective Medium-Priority	Near-term (0-3 months)	PEU, Task Manager
XIV	Revisit the social safeguards risks identified during formulation using the new Safeguard Risk Identification Form (SRIF) and if warranted, include, as part of the eventual transition strategy, a social plan for the workers and workplaces that could be lost altogether as a result of the Project	Corrective Low-Priority	Near-term (0-3 months)	PEU
XV	Per best practice, ensure that gender activities articulated in section A.4 of the Project Document are documented in an explicit gender action plan.	Corrective Low-Priority	long-term (6+ months < Terminal Evaluation)	PEU
XVI	The UNEP Chemicals and Health Branch should use its convening power together with the GEF Chemicals and Waste Focal Area at the GEF Secretariat, to ensure the tools, products and services created by the SAICM project penetrate the existing portfolio and are designed into future projects under GEF-8.	Augmentative Medium-Priority	Near-term (0-3 months)	GEF Task Manager, UNEP Economy Division

Annex A: Terms of Reference



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Annex B: Evaluation Framework Matrix

Proposed MTR Evaluation Framework		
Evaluation Criteria/Sub-criteria	Example Review Questions/Issues to be addressed	Main data sources & methods
<p>A. Strategic Relevance The extent to which the activity is suited to priorities/policies of target groups, recipient and donor</p>	<p>Core issues to be assessed:</p> <ul style="list-style-type: none"> • What evidence is present to suggest that the project activities are helping to elevate issues around Lead in Paint and Chemicals in Products nationally and via intergovernmental processes? • What evidence is available that the project facilitates reaching to a consensus on prioritization of BAT / BEP for Lead in Pain removal, as well as adoption of measures by governments and value chains to track and control chemicals in supply chains for building products, electronics and toys? • What evidence is present to suggest that the project has increased support for investment in and visibility of CoCs regionally and globally? <p>Evaluation framework category sub-questions:</p> <ul style="list-style-type: none"> • Is project aligned with UNEP Programme of Work and GEF Strategic Priorities? • To what extent is the SAICM project and strategy relevant to the global C&W challenges, global, regional and country needs, the international response and UNEP's mandate and capacity? • To what extent is the SAICM project contributing to UNEP commitments, ICCM resolutions, the 2030 Agenda and achievement of the SAICM 2020 goal and Post-2020 process? • Is project relevant to national environmental policy on LiP and CoC in Products? • Do interventions address specific environmental concerns and needs? • To what extent has the design of the SAICM project supported and enabled the achievement of results to date that individual ad hoc initiatives would not have otherwise been able to achieve? • Are their linkages (collaborations; complementarity/redundancy) with other GEF interventions and non-GEF initiatives? 	<ul style="list-style-type: none"> • Review of UNEP Sub-Programme; GEF programming directions; UNEP / SAICM / IOMC / Alliance documents; • National legislation passed; • National policies and strategies; • Adoption of tools; • Progress on SDG target(s) 3.9, 6.3, 8.8 and 12.4.

Proposed MTR Evaluation Framework		
Evaluation Criteria/Sub-criteria	Example Review Questions/Issues to be addressed	Main data sources & methods
	<ul style="list-style-type: none"> • Gender: How have different needs and priorities of men and women been taken into account in reaching the global environmental benefits to which the GEF is dedicated? • To what extent have results been relevant to women? 	
<p>B. Effectiveness Assess effectiveness across three components: delivery of outputs, achievement of direct outcomes and likelihood impacts</p>	<p>Core issues to be assessed (linked to measurement of “likelihood of impact”:</p> <ul style="list-style-type: none"> • What evidence is present to suggest that the project activities are helping to elevate the phase-out of LiP and CiP; • What salient risks exist for timely delivery of project outcomes by beneficiary countries (adoption of lead paint legislation, implementation of global procurement and LCA tools) and how could they be supported to ensure results are achieved in the intended times? <p>Evaluation framework category sub-questions:</p> <ul style="list-style-type: none"> • Is the delivery of outputs on track? • Is the quality of outputs to the expected level? • If not all planned outputs are not effective, feasible or deliverable in the implementation context, which have the highest priority? • Are marginalized actors effectively engaged as identified in the social safeguards assessment? • Gender: Was gender mainstreaming an explicit requirement in all job descriptions, job responsibilities, and terms of reference for the project implementation, studies, consulting work, and training? • Gender: Were gender-disaggregated targets set and were gender-disaggregated indicators used? 	<ul style="list-style-type: none"> • Review of project progress reports. • Review of PIRs (2021 when ready) • Review of annual planning targets against achievement of milestones • Undertaking interviews, group discussions and consultations with key stakeholders
<p>C. Financial Management Completeness of financial information and communication between finance staff - UNEP and site level implementers</p>	<p>Evaluation framework category sub-questions:</p> <ul style="list-style-type: none"> • To what extent is the burn rate aligned to delivery of key milestones? • Is the rate of spend consistent with proposed work plans and delivery of output? • If not, what are the reasons for deviation? 	<ul style="list-style-type: none"> • Review of PIRs, financial reports, budget revisions • Undertaking interviews and consultations.

Proposed MTR Evaluation Framework		
Evaluation Criteria/Sub-criteria	Example Review Questions/Issues to be addressed	Main data sources & methods
	<ul style="list-style-type: none"> • Has co-financing materialized and when needed? • To what extent does annual work planning factor in co-financing? • Has any reallocation of funds/adaptive management been the relevant and adequately justified? • Have financial reporting and/or auditing requirements been met? 	
D. Efficiency Cost-effectiveness and timeliness	<p>Evaluation framework category sub-questions:</p> <ul style="list-style-type: none"> • Where have synergies and dovetailing of efforts resulted in efficiencies and amplification of results? • Have interventions achieved results in a cost-effective manner? • Where planned activities delivered in line with expected timeframes? • If not, were the reasons for delays sufficiently documented, justified and their implications managed? • What collaboration has occurred between components to leverage additional resources, if any? 	<ul style="list-style-type: none"> • Review of progress reports, financial reports, relevant correspondence. • Undertaking interviews and consultations.
E. Monitoring and Reporting		
Monitoring design and implementation	<p>Evaluation framework category sub-questions:</p> <ul style="list-style-type: none"> • Did the Monitoring Plan in the Project Document facilitate timely tracking of results and progress? • Is there a clear division of monitoring responsibilities? • Were project indicators consistent, useful, relevant, SMART? • Why were changes not made to project results framework and indicators at inception? • Are baseline data and indicators available? • Are activities and outputs recorded and assessed against targets and indicators? • Did the Project Steering Committee provide strategic and technical guidance and were these recorded? • Is the Project actively tracking data towards GEF-7 Core Indicator commitments? 	<ul style="list-style-type: none"> • Review of ProDoc Results Framework, targets and indicators, work plans • Assess monitoring plan quality • Undertaking interviews and consultations • Workshop results to review Results Framework and Theory of Change

Proposed MTR Evaluation Framework		
Evaluation Criteria/Sub-criteria	Example Review Questions/Issues to be addressed	Main data sources & methods
	<ul style="list-style-type: none"> • Were any necessary corrective actions proposed and adopted in a timely manner? • Were adaptive management mechanisms in place and used to expedite implementation? 	
Project reporting	<p>Evaluation framework category sub-questions:</p> <ul style="list-style-type: none"> • Does project reporting follow expected and/or good practice procedure; • Does reporting comply with ProDoc requirements and cadence? • Are key issues of project implementation clearly presented in reports to facilitate adaptive management? (e.g. lessons learnt, problems encountered) • Is risk being proactively mitigated? 	<ul style="list-style-type: none"> • Review of progress reports and financial reports, PEU risk register; • Undertaking interviews and consultations.
<p>F. Sustainability Key conditions and factors that influence persistence of achieved outcomes</p>	<p>Core issues to be addressed:</p> <ul style="list-style-type: none"> • Is there adequate consideration and planning for promotion and uptake of the global tools developed by SAICM stakeholders, and how can the project use ICCM5 to support this? • What elements would be needed for an exit strategy for the project's benefits to be sustained after the project end, and how could this be incorporated in the project implementation including budget needs? <p>Evaluation framework category sub-questions:</p> <ul style="list-style-type: none"> • Are any improvements to the status and management of key sites likely to endure after project completion? • Are processes and continuity plans being internalized by key partners and stakeholders? • Have appropriate allocations for LiP and CiP been included in national budgets? • What is the level of commitment among key stakeholders to continue with core activities and operations post-project? • Are institutional achievements strong enough and sufficiently mainstreamed to continue to deliver benefits after project closure? 	<ul style="list-style-type: none"> • Validation of processes and business continuity plans • Verification of budget allocation • MoUs and/or SLAs established • Undertaking interviews and consultations.

Proposed MTR Evaluation Framework		
Evaluation Criteria/Sub-criteria	Example Review Questions/Issues to be addressed	Main data sources & methods
	<ul style="list-style-type: none"> • Has the unprecedented effort to change supply chains been catalysed / set in motion through the SAICM project? • Gender: Is the level of stakeholder ownership sufficiently gender sensitive or gender specific to allow for project outcomes/benefits to be sustained? • Gender: What are the assumptions about gender roles, norms and relations that supported or hindered the project? And how will these factors affect the sustainability of the results? 	
G. Factors and Processes Affecting Project Performance		
Preparation and Readiness	<p>Evaluation framework category sub-questions:</p> <ul style="list-style-type: none"> • Were challenges to or constraints in project design identified during initial project stages? If so, how were these addressed? • To what extent has the Project design and implementation been informed from previous reviews, including the Independent Review of the Strategic Approach (2006-2015); • Are any changes to project design through adaptive management responses justified and documented? • How were stakeholder groups engaged in the project? • Was a capacity analysis partners carried out? • Were any “readiness” activities carried out if capacity gaps were identified? • What preparatory / readiness activities were undertaken during the inception phase? 	<ul style="list-style-type: none"> • Review of project design documents, results framework and budget • Review of relevant correspondence and recording of any required approvals • Undertaking interviews and consultations.
Quality of Project Implementation and Execution	<p>Evaluation framework category sub-questions:</p> <ul style="list-style-type: none"> • Did UNEP and executing organizations provided the expected leadership (technical and managerial support) to project stakeholders? • Did executing organisations adopt risk management strategies, problem-solving approaches and adaptive management? • To what extent has the Project responded to risks and shortcomings noted in the 2020 PIR and how? 	<ul style="list-style-type: none"> • Review of relevant correspondence and recording of any required approvals • Undertaking interviews and consultations.

Proposed MTR Evaluation Framework		
Evaluation Criteria/Sub-criteria	Example Review Questions/Issues to be addressed	Main data sources & methods
Stakeholders participation and cooperation	<p>Evaluation framework category sub-questions:</p> <ul style="list-style-type: none"> • Were communications among project partners effective? • Were any formal communication protocols applied? • Were project outputs and learning experiences shared? • Was technical expertise shared and were co-implementing teams mentored? • What processes are in place to indicate the broad range of stakeholders are kept abreast of Project progress, developments and achievements? 	<ul style="list-style-type: none"> • Review of relevant correspondence and recording of any required approvals • Undertaking interviews and consultations.
Responsiveness to Human Rights and Gender Equity	<p>Evaluation framework category sub-questions:</p> <ul style="list-style-type: none"> • Were gender related challenges adequately addressed in project implementation? • Were other potentially marginalised groups adequately engaged? • Is there a gender action plan and is it being consulted regularly? • Were the impacts of potential inequalities related to investments in social and economic development, and especially natural resource management on women, youth and indigenous people assessed and responded to? • What social safeguards are in place and are risks being regularly monitored? 	<ul style="list-style-type: none"> • Review of project policies and practices relevant to potentially excluded groups. • Undertaking interviews and consultations. • Review of possible gender-related challenges met by the project
Country ownership and drivenness	<p>Evaluation framework category sub-questions:</p> <ul style="list-style-type: none"> • Have mechanisms for the selection and engagement of local communities and enterprises been appropriate and effective? • Have mechanisms for the engagement of government agencies, civil society and the private sector been appropriate and effective? 	<ul style="list-style-type: none"> • Review of relevant correspondence and recording of any required approvals • Undertaking interviews and consultations.
Communication and public awareness	<p>Evaluation framework category sub-questions:</p> <ul style="list-style-type: none"> • Is there a public awareness strategy aimed to disseminate project impact and learning? • How comprehensive is the KM strategy for Component 3? 	<ul style="list-style-type: none"> • Review of communication strategies and materials • Undertaking interviews and consultations.

Proposed MTR Evaluation Framework		
Evaluation Criteria/Sub-criteria	Example Review Questions/Issues to be addressed	Main data sources & methods
	<ul style="list-style-type: none"> Is the public awareness strategy targeting the correct audiences, and is content relevant to the project's goals? 	

Annex C: List of Documents Consulted

No.	Name
1	Terms of Reference Mid-Term Review of the UNEP/GEF project “Global Best Practices on Emerging Chemical Policy Issues of Concern under the Strategic Approach to International Chemicals Management (SAICM)” (GEF ID 9771)
2	SAICM_FSP_CEO Endorsement Report
3	FREESIA Inception Report v2.0
4	Reconstructed Theory of Change
5	HERD MTR Inception Report
6	Inception report Mixteca TE
7	Response to SAICM Inception Report Comments_v0.2
8	Chemicals of Concern in Plastic Toys
9	Toxic Chemicals in Toys and Children's Products: Limitations of Current Responses and Recommendations for Government and Industry
10	2020 PIR-9771-Core Indicator
11	2021 – PIR Template – 9771
12	9771_SAICM_TOR Mid Term Review
13	IA signed by both parties 13.11.2018
14	PIR_9771_2020
15	SAICM GEF 9771 Progress Report Q1 2020
16	SAICM GEF 9771 Y2Q2 expenditure report V5Final
17	SAICM GEF 9771 Y2Q3 expenditure report Final
18	SAICM GEF 9771 Y2Q4 expenditure report signed
19	SAICM GEF 9771 Y3 Progress Tracker Q1 2021_vf
20	SAICM GEF 9771 Progress Report Q2 2020 Final
21	SAICM GEF 9771 Progress Report Q3 2020 Final
22	SAICM GEF 9771 Quarterly Progress Report Q4 2020 Final
23	SAICM- List of indicators for reporting progress
24	Update on the Global Status of Legal Limits on Lead in Paint December 2020: https://wedocs.unep.org/bitstream/handle/20.500.11822/35105/GS-2020.pdf?sequence=3
25	Women, Chemicals and the SDG: https://saicmknowledge.org/sites/default/files/publications/ipen-gender-chemicals-report-v1_6dw-en.pdf
26	Synopsis of the Chemicals in Products (CiP) Programme guidance for Governments: https://wedocs.unep.org/xmlui/bitstream/handle/20.500.11822/29192/CiP_Gde.pdf
27	UNEP Chemicals and Products Programme - https://www.unep.org/explore-topics/chemicals-waste/what-we-do/emerging-issues/chemicals-products

28	An Assessment Report on Issues of Concern: Chemicals and Waste Issues Posing Risks to Human Health and the Environment 2020 - https://wedocs.unep.org/bitstream/handle/20.500.11822/33807/ARIC.pdf?sequence=1&isAllowed=y
29	Chemicals and Waste Reports for UNEA 5 - https://www.unep.org/resources/report/chemicals-and-waste-reports-unea-5
30	Women Chemicals and the SDGs: https://saicmknowledge.org/sites/default/files/publications/ipen-gender-chemicals-report-v1_6dw-en.pdf
31	Overall orientation and guidance for achieving the 2020 goal of sound management of chemicals (SAICM/ICCM.4/6)
32	http://www.saicm.org/Portals/12/documents/meetings/ICCM4/doc/K1501995%20SAICM-ICCM4-6-e.pdf
33	Third meeting of the intersessional process considering the Strategic Approach and sound management of chemicals and waste beyond 2020 3(b)i: Reflections on and outcomes of the OEWG3: Co-chairs of the intersessional process to present the papers drafted at the request of the OEWG3 4(c): Development of recommendations for consideration by the fifth session of the Conference regarding the Strategic Approach and the sound management of chemicals and waste beyond 2020: Mechanisms to support implementation http://saicm.org/Portals/12/documents/meetings/IP3/Docs/SAICM_IP3_5_Other_mechanisms_support_implementation.pdf
34	Mapping of Stakeholders for the Regional Electronics Study and Circularity Roadmap in the Latin America and The Caribbean - https://saicmknowledge.org/library/mapping-stakeholders-regional-electronics-study-and-circularity-roadmap-latin-america-and
35	WHO Chemicals Roadmap - https://www.who.int/ipcs/saicm/ChemicalsRoadMapbrochure_en.pdf?ua=1
36	Eighth Teleconference of the Bureau of the International Conference on Chemicals Management for its fifth session Recommendations for continuing SAICM and a preparatory process for the postponed IP4 and ICCM5 meetings (revised) http://www.saicm.org/Portals/12/Documents/meetings/Bureau/ICCM5B16/SAICM_ICCM5-Bureau_TC_8_3_Recommendations%20IP4%20and%20ICCM5.pdf
37	Ninth Teleconference of the Bureau of the International Conference on Chemicals Management for its fifth session Progress in Strategic Approach Implementation 2017-2019 (revised) http://www.saicm.org/Portals/12/Documents/meetings/Bureau/ICCM5B17/SAICM_ICCM5-Bureau_TC_9_7_Progress%20on%20Strategic%20Approach%202017-2019_revised.pdf
38	GEF/C.55/04/Rev.01 (December 20, 2018), "Policy measures to enhance operational efficiency, accountability and transparency"
39	UNEP Evaluation Policy, March 2016
40	UNEP Evaluation Manual, 2008
41	2002 Johannesburg Plan of Implementation
42	Strategic Approach to International Chemicals Management
43	Economic Costs of Childhood Lead Exposure in Low- and Middle-Income Countries
44	Chemical Challenge
45	Brominated flame retardants in black plastic kitchen utensils: Concentrations and human exposure implications
46	Health consequences of exposure to e-waste: a systematic review

47	Are chemicals in articles an obstacle for reaching environmental goals? - Missing links in EU chemical management
48	The Business Case for Knowing Chemicals in Products and Supply Chains
49	Theory of Change
50	Strategic Approach to International Chemicals Management, 23 July 2015
51	United Nations Environment Assembly of the UNEP: Programme of work and budget for the biennium 2018–2019
52	United Nations Environment Assembly of the UNEP: Programme of work and budget for the biennium 2020–2021
53	Chemicals of Concern in the Building and Construction Sector
54	Chemicals of Concern in Electronics: Review of Legislative and Regulatory Approaches
55	Review of chemicals-related Toy Safety Policies and Regulations in selected Low- and Middle-Income Countries
56	Summary on Chemicals in Toys Policy in China
57	Knowledge Management and Information Sharing for the Sound Management of Industrial Chemicals, Policy Brief, July 2019
58	IUPAC WORLD CHEMISTRY CONGRESS 2021 VIRTUAL, Presentation
59	Project brief saicmknowledge.org revamp

Websites Consulted:

No.	Name
1	https://usetox.org/events/usetox-summer-school-2021
2	http://www.saicm.org/Implementation/GEFProject/LeadinPaintComponent/Output11/tabid/7974/language/en-US/Default.aspx
3	https://www.who.int/campaigns/international-lead-poisoning-prevention-week
4	http://www.saicm.org/Beyond2020/IntersessionalProcess/VirtualWorkingGroups/tabid/8563/Default.aspx
5	http://www.saicm.org/Beyond2020/IntersessionalProcess/FourthIntersessionalmeeting/tabid/8226/Default.aspx
6	http://www.saicm.org/About/Bureau/Bureaumeetings/tabid/5949/Default.aspx
7	https://icca-chem.org/focus/chemicals-management/saicm-beyond-2020/
8	https://saicmknowledge.org/blog

Annex D: List of Interviews Conducted

No.	Date	Name	Organization
1	12 July 2021	Kenneth Davis & Nicoline Lavanchy	UNEP CHB
2	12 July 2021	Sandra Averous-Monnery & Bettina Heller	UNEP RMB, Economy Division
3	13 July 2021	Eduardo Petit-Caldera	SAICM Secretariat, PEU
4	13 July 2021	Eloise Touni	UNEP-GEF Chemicals and Waste Portfolio
5	14 July 2021	Eduardo Petit-Caldera & Oleksandr Nazarenko	SAICM Secretariat, PEU
6	16 July 2021	Kenneth Davis	UNEP CHB
7	21 July 2021	Halshka Graczyk	ILO
8	21 July 2021	Nalini Sharma	SAICM Secretariat
9	21 July 2021	Angela L. Bandemehr	USEPA
10	22 July 2021	Vilma Morales Quillama & Paulo Jose Porta Bedon	Government of Peru (Ministerio del Ambiente)
11	22 July 2021	Sandra Averous-Monnery & Amélie Ritscher	UNEP RMB, Economy Division
12	22 July 2021	Margaret Wiggins & Timothy Meyer	ABA-ROLI
13	23 July 2021	Ivan Djurickovic	Serbian Ministry of Agriculture and Environmental Protection Department, Division for Chemicals Risk Management
14	23 July 2021	Nicoline Lavanchy	UNEP CHB
15	23 July 2021	Carolyn Vickers, Lesley Jayne Onyon	WHO
16	26 July 2021	Brenda Koekkoek	Programme Officer at the SAICM Secretariat (former)
17	27 July 2021	Branko Dunjic	NCPC-Serbia and PSC Chair
18	28 July 2021	Yao Bernard Koffi	ECOWAS, Division Environment & Climate Change
19	28 July 2021	Maria Delfina Cuglievan Wiese	SAICM Secretariat
20	29 July 2021	Eduardo Petit-Caldera	SAICM Secretariat, PEU
21	29 July 2021	Yuan Chen	BCRC-SCRC China - Regional Centres
22	30 July 2021	Eduardo Petit-Caldera, Nicoline Lavanchy, Sandra Averous-Monnery and Bettina Heller	Management Team - Workshop
23	30 July 2021	Samantha Kumarasena and Chetha Dharmawansa	NCPC-Sri Lanka
24	30 July 2021	Stewart Muir	Bioregional
25	3 August 2021	Sonia Valdivia	World Resources Forum
26	3 August 2021	Fiona Bennin and Andrea Rother	University of Cape Town
27	5 August 2021	Desiree Raquel Narvaez	Programme Officer (former) UNEP CHB
28	6 August 2021	Miriam Orbea	CEER (Centro Ecuatoriano de Eficiencia de Recursos)

29	9 August 2021	Lynn Wagner	IISD
30	10 August 2021	Josefine Hintz	ICLEI
31	17 August 2021	Peter Fantke, Llorenç Mila i Canals and Olivier Jolliet	USEtox, UNEP and University of Michigan
32	18 August 2021	Otmar Deubzer	UNITAR / Fraunhofer Institute for Reliability and Microintegration
33	20 August 2021	Benjamin Simmons	UNEP Green Growth Knowledge Platform

Annex E: Master List of Indicative Questions

General Questions:

1. Tell me a little about your portfolio and how the SAICM project fits into the overall portfolio and strategy?
2. Do you believe the SAICM project is still relevant to the regional / global context compared to when it was first designed? How so? Has COVID-19 shifted priorities?

Design:

3. Tell me a little more about the MSP that hasn't quite got off the ground yet? Has this affected the integrity of the overall design and intention of the projects running in parallel in the context of sharing of staff (i.e.: outreach and stakeholder engagement consultant) or intentions of the KM platform to also include EDPs and EPPPs in the community of practice?
4. Do you believe there is a disconnect between the project's objectives, its 4-year timeline and scale (both geographic and institutional) at which it is supposed to operate?

Strategy:

5. To date, how has the project helped to advance knowledge on EPIs and the SAICM Beyond 2020 process and to what extent have linkages been made to the 2030 Agenda regarding relevant SDGs?
6. Has the project and the GEF resources been able to contribute to a more coherent approach on and demonstrate leadership on EPIs and value chains than would otherwise be possible? How so?
7. With many of the meetings designed to inform the 2020 process postponed (ICCM5, IP4, OEWG and AMCEN to name a few), how has the project been able to shape the global agenda on chemicals of concern to date, what opportunities do you see going forward during the remainder of the project and what recommendations do you have in this regard?
8. Do you believe the project is taking the right approach (i.e. carrots vs. sticks and voluntary mechanisms vs. enforcement)?
9. If you had the opportunity to redesign the project, what changes would you make?

Implementation:

10. Is the support you are providing to the project in line with requirements / expectations, or has there been a need for more engagement and "hand-holding" over and above your mandate?
11. Are you part of the annual work planning process? Has this been effective and smooth?
12. Were the growing pains / delays encountered by this project in line with what one would expect from a project of similar scope and complexity?
13. How has cooperation been between yourself, the PEU and Component Leads? Any recommendations going forward regarding meeting cadence, reporting, escalations?
14. What concerns do you have about the project to date and its trajectory?
15. What remaining barriers exist, to achieving the project objective, within the time remaining until project completion?
16. Can you elaborate on challenges towards establishing a regional standard in the ECOWAS region and the challenges therein?

17. How has COVID-19 impacted the project's outcome and objectives?
18. Are implementing partners demonstrating leadership and vision thus far? Is there evidence of "champion" countries emerging or welcome surprises?
19. Do you see any deviations of roles as originally envisaged / conceptualized in the design?

M&E:

20. Have there been any notable changes to targets in the project's results framework (informal vs. formal discussions)? Do you believe some targets need to be revisited?
21. Are the quality of reports you are receiving in line with expectations and those from other projects?

Financing:

22. Are activities being undertaken in the most efficient / cost-effective manner?
23. Cost effectiveness? Efficiencies?
24. Has procurement and disbursements been timely and efficient?

Governance:

25. Efficiency effectiveness of the Steering Committee?

Gender and Social Safeguards:

26. Are gender issues sufficiently being addressed through the project and through the SAICM Beyond 2020 process? How can gender factor stronger?
27. Are you satisfied with the manner in which gender / social risks factored into planning of and implementation of activities? Do you believe the social safeguard risks identified during the design ought to be revisited based on the work that is happening (i.e.: with SMEs)?

Sustainability:

28. To what extent has exit planning / transition planning started? Do you have any thoughts on how the project can be transitioned in an effective and efficient manner?
29. What institutional / governance / financial barriers do you envisage in the completion and/or sustainability of the project?
30. Has turnover or insufficient continuity been an obstacle in any way to project implementation?

Annex F: Theory of Change and Results Framework Review Workshop Presentation



UNEP-GEF SAICM
Project ToC Worksh

Annex G: Results of Online Questionnaire



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Annex H: Presentation of Findings and Preliminary Recommendations



UNDP-GEF SAICM
MTR_Observations z

Annex J: CV and Short Biography of the Review Consultant



Camillo
Ponziani_CV_Augus

Camillo Ponziani is a motivated leader and program management professional with a proven talent in bridging the gap between strategy and execution. Camillo is genuinely passionate about understanding the big picture and helping organizations map out their current and desired business goals and assisting clients towards realizing their full potential.

Camillo has held various senior management roles within the United Nations system. Camillo has worked and consulted for UN organizations and specialized agencies including the Global Environment Facility, UNDP Drylands Development Centre, UNEP, UNOCHA and UNOPS, as well as the Secretariats of the Convention on Biological Diversity, Convention on Migratory Species and African-Eurasian Waterbird Agreement. He has also led consulting assignments within the public and private sectors including at eHealth Ontario and the Greater Toronto Airports Authority, where he led teams through a myriad of business and information technology transformation initiatives that have driven impact across multiple business units.

While at the Secretariat of the Convention on Biological Diversity, Camillo was responsible for helping set the strategic direction of the post-2020 Global Biodiversity Framework, managed a technical and scientific cooperation portfolio and established a Program Management Office. He also helped internalize the Secretary General's management and development reforms to scale-up the delivery of the 2030 Agenda for Sustainable Development within the Secretariat.

With over fifteen years' experience within the UN international system, Camillo brings a wealth of biodiversity, protected area and natural resource management experience and knowledge of UN practices and has also led the design, management and evaluation of numerous UNDP- and UNEP-supported GEF-financed projects throughout his career.

Annex K: Official MTR Ratings Scale and Weightings Table

MTR Ratings Scale:

Criterion <i>(Enter each rating into the Weighting of Ratings table to arrive at the rating for each criterion and the overall project rating)</i>	Summary Assessment	Rating
A. Strategic Relevance		HS → HU
1. Alignment to UNEP's MTS and POW		HS → HU
2. Alignment to Donor/GEF strategic priorities		HS → HU
3. Relevance to regional, sub-regional and national environmental priorities		HS → HU
4. Complementarity with existing interventions		HS → HU
B. Effectiveness⁴⁶		HS → HU
1. Availability of outputs		HS → HU
2. Achievement of project outcomes		HS → HU
3. Likelihood of impact		HL → HU
C. Financial Management		HS → HU
1. Adherence to UNEP's policies and procedures		HS → HU
2. Completeness of project financial information		HS → HU
3. Communication between finance and project management staff		HS → HU
D. Efficiency		HS → HU
E. Monitoring and Reporting		HS → HU
2. Monitoring of project implementation		HS → HU
3. Project reporting		
F. Sustainability <i>(the overall rating for Sustainability will be the lowest rating among the three sub-categories)</i>		HL → HU
1. Socio-political sustainability		HL → HU
2. Financial sustainability		HL → HU
3. Institutional sustainability		HL → HU
G. Factors Affecting Performance and Cross-Cutting Issues⁴⁷		HS → HU
1. Preparation and readiness		HS → HU
2. Quality of project management and supervision ⁴⁸		HS → HU
3. Stakeholders participation and cooperation		HS → HU

⁴⁶ Where a project is rated, through the assessment of Project Design Quality template during the review inception stage as facing either an Unfavourable or Highly Unfavourable external operating context, ratings for Effectiveness, Efficiency and/or Sustainability may be increased at the discretion of the Review Consultant and Project Manager together. Any adjustments must be fully justified.

⁴⁷ While ratings are required for each of these factors individually, they should be discussed within the Main Review Report as cross-cutting issues as they relate to other criteria. Note that catalytic role, replication and scaling up are expected to be discussed under effectiveness if they are a relevant part of the TOC.

⁴⁸ In some cases, 'project management and supervision' will refer to the supervision and guidance provided by UNEP to implementing partners and national governments while in others, specifically for GEF funded projects, it will refer to the project management performance of the Executing Agency and the technical backstopping provided by UNEP, as the Implementing Agency.

Criterion <i>(Enter each rating into the Weighting of Ratings table to arrive at the rating for each criterion and the overall project rating)</i>	Summary Assessment	Rating
4. Responsiveness to human rights and gender equity		HS → HU
5. Environmental, social and economic safeguards		HS → HU
6. Country ownership and driven-ness		HS → HU
7. Communication and public awareness		HS → HU
Overall Project Rating		HS → HU

MTR Weightings Table:

Evaluation criteria	Rating	Score	Weight	Weighted Score
Strategic Relevance (select the ratings for sub-categories)	Highly Satisfactory	5	6	0.3
Alignment to UNEP's MTS, POW and strategic priorities	Highly Satisfactory	6	0.5	
Alignment to Donor/GEF/Partner strategic priorities	Highly Satisfactory	6	0.5	
Relevance to regional, sub-regional and national issues and needs	Satisfactory	5	2.5	
Complementarity with existing interventions	Satisfactory	5	2.5	
Effectiveness (select the ratings for sub-categories)	Highly Satisfactory	5	49	2.5
Availability of outputs	Satisfactory	5	20	
Achievement of project outcomes	Satisfactory	5	20	
Likelihood of impact	Highly Likely	6	9	
Financial Management (select the ratings for sub-categories)	Highly Satisfactory	6	5	0.3
Adherence to UNEP's policies and procedures	Highly Satisfactory	6		
Completeness of project financial information	Highly Satisfactory	6		
Communication between finance and project management staff	Highly Satisfactory	6		
Efficiency	Satisfactory	5	10	0.5
Monitoring and Reporting (select the ratings for sub-categories)	Satisfactory	5	5	0.2
Monitoring of project implementation	Moderately Satisfactory	4		
Project reporting	Satisfactory	5		
Sustainability (select the ratings for sub-categories)	Likely	5	20	1.0
Socio-political sustainability	Highly Likely	6		
Financial sustainability	Likely	5		
Institutional sustainability	Likely	5		
Factors Affecting Performance (select the ratings for sub-categories)	Highly Satisfactory	6	5	0.3
Preparation and readiness	Satisfactory	5		
Quality of project management and supervision	Highly Satisfactory	6		
Stakeholder participation and cooperation	Highly Satisfactory	6		
Responsiveness to human rights and gender equity	Highly Satisfactory	6		
Environmental and social safeguards	Satisfactory	5		
Country ownership and driven-ness	Highly Satisfactory	6		
Communication and public awareness	Highly Satisfactory	6		
			100	5.16
				Highly Satisfactory



Annex L: Recommendations to the Project's Results Framework

Project Objective	Objective level Indicators	Baseline	Targets and Monitoring Milestones	Means of Verification	Assumptions & Risks	UNEP MTS reference
<p>Accelerate adoption of national and value chain initiatives to control Emerging Policy Issues (EPIs), and contribute to the 2020 SAICM goal and 2030 Agenda for Sustainable Development.</p> <p>Accelerate the adoption of national and value chain initiatives to control Emerging Policy Issues (EPIs).</p>	<p>1. No. of countries and companies that have adopted regulatory and value chain initiatives to control EPIs, and to meet 2030 Agenda targets.</p> <p>Number of countries and companies that have adopted regulatory and value chain initiatives to control EPIs.</p>	68 countries have regulated lead paint. Currently, there is no comparative assessments of direct toxicity of products containing POPs and other CoCs, including toys, building products and electronics.	<p>Composite indicator (Outcomes 1, 2 and 3) = 40 national governments pass adopt lead laws + 50 35⁴⁹ paint producers + 2 governments with SPP + 26 companies using USEtox®/ phasing out CoC.</p> <p>By 2020 2022, at least 2 manufacturers in LMIC demonstrate reduced toxicity of products.</p>	CoP reports on EPI USEtox model	Political will exists for taking recommended measures Alternatives to CoC exist in LMIC markets	NA
Component 1: Promoting regulatory and voluntary action by government and industry to phase out lead in paint						
Outcome 1	Outcome Indicators	Baseline	Targets and Monitoring Milestones	Means of Verification	Assumptions & Risks	UNEP MTS Expected Result
Countries legislate and implement legislation	2. No. of countries with adopted	As of February 2018, 68 countries	80 countries by Year 2 (existing champion countries)	Gazetting (or	Governments are proactive.	Chemicals, Waste and Air

⁴⁹ 50% of the targeted SMEs have applied the reformulation process to at least one other product.

<p>to restrict the use of lead in paint (LiP, 40 countries):</p>	<p>legislation on legal limits to LiP</p> <p>Number of countries with adopted legislation and/or final texts awaiting political validation on legal limits to LiP.</p> <p>OR as suggested by GEF Task Manager...</p> <p>Number of countries with Legislation submitted for adoption to Cabinets or relevant approving bodies.</p>	<p>have regulated lead paint. The PPG involved extensive research, consultation and classification of countries into a framework for action. The project has identified 70 countries where there is evidence the country is ready to regulate lead paint.</p>	<p>110 countries by 2020</p> <p>By 2022, 40 countries with adopted legislation or final texts awaiting political validation (including at least 20 countries with adopted legislation)</p>	<p>equivalent) or legislation</p>	<p>Project has adequate resources to provide legal drafting assistance to 50 countries.</p>	<p>Quality Expected Accomplishment 5 (a) 350</p>
	<p>3. No. of paint manufacturers switching to lead free production</p>	<p>While some global brands have phased out lead, SMEs in project countries still continue to produce paint with lead as</p>	<p>50 35 manufacturers by 2020 2022 in 8 7 countries, of which at least 50% have gone on to reformulate additional products.</p>	<p>Independent testing of paints</p>	<p>Lead free methods are either cost neutral or imposed by regulation</p>	

⁵⁰ Technical guidance and support services for the establishment and enforcement of laws, regulations and fiscal policies for sound chemicals management

		demonstrated by lead paint testing (see output level baseline below)				
	4. No. of registered awareness raising events	Countries hosting International Lead Poisoning Prevention Week events: 40 2013; to 41 countries in 2017	Partners convene 50 events for International Lead Poisoning Prevention Week and as needed	Lead Paint Alliance website	The few activities directly funded by the project will trigger partners to scale these events up	
Outcome 1 Outputs	Baseline		Targets and Monitoring Milestones	Means of Verification	Assumptions & Risks	UNEP PoW Output Reference Number
Output 1.1 Demonstration pilots with paint manufacturers in Small and Medium Sized enterprises executed in eight countries	Pilot countries (Ecuador, Colombia, Peru, China, Indonesia, Jordan, and Nigeria) have significant paint industries. In all of these countries lead concentrations in paint is currently unregulated, or under-regulated, and lead pigments and driers are used by SMEs in paint formulation. Ecuador paint testing found 70% of paints samples had lead concentrations > 90 ppm. Colombian paint testing found that 64% of paints samples had lead concentrations > 600 ppm, with 59% of paints with lead concentrations >10,000 ppm. Paint testing results in Peru indicated 90% of paints had lead concentrations >90 ppm, and 40% of paints had concentrations >10,000 ppm. In China, paint testing found		Mid-term & 7 demonstration pilots finalize national paint sector reviews 4 governments receiving legal drafting support from ABA-ROLI End of project: Pilot demonstrations completed in & 7 countries & 7 governments receive legal drafting support from ABA-ROLI and draft legislation 305 SMEs executed demonstration pilots	NCPC/IPE N reports NCPC/IPE N / ABA-ROLI reports NCPC/IPE N / ABA-ROLI reports	SMEs are able to phase out use of lead in paint	Subprogramme 5 Chemicals, waste and air quality: Expected accomplishment a, indicator (ii) ⁵¹

⁵¹ Increase in the number of private companies/industries that have developed or implemented a strategy or specific actions on sound chemicals management using UNEP analysis or guidance

	<p>34% of paints contained lead concentrations > 10,000 ppm. China currently has a non-protective standard of 90ppm – 1000ppm for soluble lead, depending on paint use. Indonesian paint testing found 78% of paints sampled had concentrations greater than 600 ppm, and 41% of paints had a lead concentrations greater than 10,000ppm. In Jordan, there is a nonprotective legislation of 600ppm and the government plans to introduce a more stringent limit. 18% of paints tested had lead concentrations >90ppm. A Nigerian paint study found 74% of paints sampled to have lead concentrations > 90 ppm, with 54% have concentrations >10,000 ppm.</p>		Report		
<p>Output 1.2 Policy support and awareness raising generate support for lead phase out.</p>	<p>The Lead Paint Alliance provides ad-hoc support to countries and tracks the number of countries regulating lead in paint. A Model Law has been developed but not systematically rolled out with countries.</p> <p>The number of countries hosting International Lead Poisoning Prevention Week events has remained stable over time (40 countries in 2013; to 41 countries in 2017), indicating the growing awareness needed to take action on this issue, is not occurring, and that more work is needed.</p>	<p>Mid term 20 countries receiving drafting assistance. Events convened in 15 countries for International Lead Poisoning Prevention Week</p> <p>End of project 50 countries received legal assistance 20 countries convening events for International Lead Poisoning Prevention Week</p>	<p>Regional workshop reports (containing national project plan) ABA ROLI mission reports (on national drafting workshops) Lead Paint Alliance website Project</p>	<p>Governments receptive to working with the project to expedite lead paint regulation. Pressure from industry does not prevent governments regulating lead paint.</p>	<p>Subprogramme 5 Chemicals, waste and air quality: Expected accomplishment a, indicator (i)⁵²</p>

⁵² Increase in the number of countries that have used UNEP analysis or guidance, and where possible are applying a multi-sectoral approach, in developing or implementing legislation, policies or action plans that promote sound chemicals management and implementation of the relevant multilateral environmental agreements and SAICM

Component 2: Lifecycle management of chemicals present in products						reports
Outcome 2	Outcome Indicators	Baseline	Targets and Monitoring Milestones	Means of Verification	Assumptions & Risks	UNEP MTS Expected Result
Governments and value chain actors in the building products, toys, and electronics sectors track and manage chemicals of concern (CoC) in their products.	5. Number of governments and value chain actors tracking and managing CoC in products	Global brands and companies selling in developed countries should meet regulatory and voluntary chemical management requirements (e.g. product recalls for toys). Sustainable Public Procurement (SPP) policies exist in many countries but do not explicitly address CoC	<p>End of Project</p> <p>2 governments set SPP and green building code requirements for CoC (Sri Lanka & Colombia)</p> <p>1 government with SPP and 1 government with eco-label guidelines (Sri Lanka & Colombia)</p> <p>6 companies meet SPP CoC requirements (Sri Lanka, Colombia)</p> <p>3 companies prepared to meet SPP CoC requirements and 3 companies meet eco-label CoC requirements (Sri Lanka, Colombia)</p> <p>20 10 companies use USEtox tools to evaluate toxicity (Sri Lanka, China)</p> <p>40 companies report toy results on UNEP / CiP portal (China)</p> <p>By end of project 3 companies in China using tools to establish or advance a chemicals management system</p>	Green Building Code / tender documents USEtox reports	Governments are committed to implementing their published SPP policies	Subprogramme 6 on Resource Efficiency, EA b, Output 1, indicator (i)
	6. The number of trained value chain and	Tools that reflect CoC are only the Colombian	End of project At least 30% of 305 individuals trained provide feedback on how	Emails and reports received	Training participants are selected	Subprogramme 6 on Resource

	government actors providing feedback on use of new tools and guidance (min 30% female)	electronics draft SPP policy. This has not been rolled out yet or piloted for CoC.	they have applied the training on the new tools (100 people, 30 women)	from partners	based on their ability to implement changes as a result of the training	Efficiency, EA b, Output 1, indicator (i)
Outcome 2 Outputs	Baseline		Targets and Monitoring Milestones	Means of Verification	Assumptions & Risks	UNEP PoW Output Reference Number
Output 2.1 New tools and guidance to reduce the use of CoCs in the building, electronics and toys sectors	<p>Life cycle assessment tools include hazardous chemicals but few alternatives. Near field (=direct) exposure pathways limited in USEtox; and multi-layer materials are not modelled.</p> <p>Sri Lanka Green Building Code covers VOC and green labelled building materials including GREEN Product Labelling System which considers chromium 6 and lead in paints.</p> <p>Brazil: voluntary standard (PBQP-H) used in public procurement includes lead free paint, lead and cadmium free coatings and porcelain, flame retardants for walls and roof</p> <p>Green finance for buildings exists but does not address chemicals.</p>	<p>Mid-term Report on CoC and alternatives in building sector (global)</p> <p>Cost benefit analysis for electronics SPP practices (Colombia)</p> <p>2 regional electronics studies (LAC and CEE)</p> <p>Report on chemical concentrations in toys and regulatory compliance in China</p> <p>End of project Building sector: 3 guidance/ tools: USEtox assessment of building product impacts on human health, ecotox and other metrics</p> <p>SPP global guidance for building products;</p> <p>Global guide for banks on setting</p>	<p>Reports</p> <p>USEtox</p> <p>Publications</p> <p>Tender documents Publications</p>	<p>Alternatives to CoC exist and are accessible to producers in LMIC markets; the USEtox model is suited to their needs.</p> <p>International building council and global initiatives have capacity to address all their stated priorities including healthy buildings.</p>	<p>From LC Initiative: 62153 Subprogramme 6 on Resource Efficiency, EA b, Output 1, indicator (i)54</p> <p>Subprogramme 6 on Resource Efficiency, EA b, Output 1 (ii)55</p> <p>Subprogramme 5, EA (a), indicator (ii)</p>	

⁵³ Database services providing enhanced availability and accessibility of life cycle assessment data through an interoperable global network, methods for establishing environmental and social indicators and the ways to apply them in decision-making, practical tools for the application of life cycle information in decision-making, and capacity development

⁵⁴ Increase in the number of public and private stakeholders that base their decision-making on life cycle approaches

⁵⁵ Increase in the number of public and private finance stakeholders that adopt sustainable finance principles, processes and frameworks

	<p>Colombian National Policy for WEEE and technical sheets prioritize cadmium, chrome, lead and mercury, plastics with flame retardants, and CFCs, PCBs, Ozone Depleting Substances. US-based IT sector standards including EPEAT include criteria that assess corporations' commitment to responsible chemicals management throughout their supply chain</p> <p>EU RoHS legislation on electronics applied in 33+ countries beyond EU, contains 6 CoC.</p> <p>Amfori trade association chemical audit and reporting tool (for members only)</p>	<p>up green mortgages</p> <p>Electronics sector: 2 guidance/ tools: Global guidance of SPP of electronics (including Colombia pilot case study) Global review of voluntary consensus standards for electronics</p> <p>Toys sector: 2 guidance/ tools: USEtox new model pathways added and tested with manufacturers Simple training and audit package for SMEs / non-affiliated companies</p>	<p>USEtox model Publication</p>	<p>Limited government commitment to implementing agreed SPP guidance and criteria. Government procurement services will implement their policy.</p> <p>Electronics that comply with EU Restriction of Hazardous Substances Directive legislation at a minimum are available in LMIC</p> <p>SME and 'non-affiliated' toy producers are engaged to reduce toxic contents, driven by regulations in export markets</p>	
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Output 2.2 Training and support for government and value chain actors to trial and adopt new guidance and tools	Finance Initiative Environmental and Social Risk Analysis Training Programme does not cover CoC. USEtox summer school organized every 2 years	End of project Green Building Council/NCPC events = 50; USEtox Summer School = 20; FI training = 100 Toy producers (China) = 50 Multistakeholder consultations, with Chinese enforcement agency, toy manufacturers and associations = 50 International consensus building workshop for electronics = 35	Training Reports	Project partners are able to build momentum within project local markets for companies to participate in trainings	Subprogramme 5, EA (a), indicator (ii)	
Component 3: Knowledge management and stakeholder engagement						
Outcome 3	Outcome Indicators	Baseline	Targets and Monitoring Milestones	Means of Verification	Assumptions & Risks	UNEP PoW Output Reference Number
A broad group of SAICM stakeholders access information and participate in communities of practice for peer-to-peer learning exchanges.	7. Number of scientific knowledge resources shared with policy makers on EPIs and SDGs	Documents including scientific information are shared as INF documents to ICCM but original research is not widely available to policy makers. Stockholm Convention POPRC and Rotterdam Convention CRC cover certain chemicals but not all EPIs	Mid-term Inputs and commentary by scientific organizations on the 12 project papers accessed by policy makers via SAICM website or meetings End of project At least 20 science media sources publishing SAICM related content	Journal articles on SAICM website Submissions to SAICM Sec	Access to key publications is possible via open access journals.	Subprogramme 5 Chemicals, waste and air quality: Expected accomplishment a, - 6
	8. No. of active members of KM communities of	The current SAICM website is static, new content	Mid-term 4 Communities of Practice (CoPs) established	CoPs on KM Platform	SAICM stakeholders have an	Subprogramme 5 Chemicals,

	practice and users accessing information, disaggregated by sex.	and information updates are limited. There is no forum for interaction and communication between stakeholders. Currently resources for maintenance and performance are lacking.	End of project >100 members in each CoP with gender balance (min 30% women)	Registered members	appetite for exchanging information on EPIs	waste and air quality: Expected accomplishment a, - 6
Outputs	Baseline		Targets and Monitoring Milestones	Means of Verification	Assumptions & Risks	UNEP PoW Output Reference Number
Output 3.1 Collaboration and engagement with the SDG and scientific communities to promote EPIs	Despite there being strong conceptual links between EPIs and the targets included in the 2030 Agenda for Sustainable Development, there is currently no coordination between the two areas of work. EPI work is currently being driven by the proponents of the EPI within the SAICM process and the IOMC lead agencies, with limited engagement of a broader stakeholder community. ICCM resolution IV/4 indicates that the Beyond 2020 process should be linked to the 2030 Agenda.		Mid-term Target = 12 papers (5 policy briefs on SDGs 2, 3, 6, 11, 12; 5 thematic papers on water, cities, science etc; 1 gender review mapping EPIs and identifying gender priorities; 1 indicators mapping paper reviewing contribution of EPIs to indicators of progress/ impact) End of project 5 presentations on SAICM at scientific community events 10 presentations at related policy events (biodiversity, cities, food systems etc)	Policy briefs Thematic papers Gender review report Mission reports	Assume the science and academic community are willing to engage with SAICM and forging links between the EPIs and the relevant SDG targets.	Subprogramme 5 Chemicals, waste and air quality: Expected accomplishment a, - 6 57

⁵⁷ Advisory, policy and coordination support services to secretariat of chemicals-related multilateral environmental agreements and the Strategic Approach to promote sound chemicals management

	SAICM's 20 indicators of reporting progress ⁵⁶ are being revised by the Beyond 2020 Intersessional Process. Revised indicators are expected to be more results-focused and relevant for diverse stakeholders to be able to align to. They will also link to the SDG targets.	2 project side events at OEWG and ICCM5 (for example at OEWG and ICCM5) 12 communications/ content pieces on HHPs, EDC/EPPPs, Lead paint, and CiP	Side event reports EPI content on KM Platform		
Output 3.2 Knowledge Management Platform provides a repository of information and forum for exchange of scientific and policy information	Large number of knowledge products by IOMC and projects on EPI topics PPG, stakeholder needs assessment which identified : access to ongoing scientific research; tracking regulatory status on chemicals and SAICM country implementation; results best practices and lessons learned. These gaps are the basis of a draft Knowledge Management Strategy initiated during the PPG. The Secretariat has also drafted a Request for Proposal for the design and build of the Knowledge Management platform. Extensive consultations have been held with potential technology providers, including MapX, SCP Platform and GGKP to define the role of geospatial data on the Knowledge Management Platform.	Mid-term 1 SAICM Knowledge Management Strategy 1 contract in place with web architecture service provider(s) for an integrated platform including spatial and non-spatial data 5 maps and visual tool prototypes constructed and tested; stakeholders consulted at OEWG3 Technical content on EPIs produced and submitted by project components (on HHP, EDC/EPPP, lead paint and CiP). End of project 50 knowledge exchange instruments featured on the Platform including 5 maps and visual tools; information on 2 EPIs. 2-4 EPIs; CoPs established for each of the two EPIs and other relevant topics (4 total)	Report Signed agreement and workplan Maps Consultation report Component reports	Assumption that the organizations and projects that have developed a very comprehensive baseline of knowledge products and experiences, will be willing and committed to sharing these through a SAICM KM platform	Subprogramme 5 Chemicals, waste and air quality: Expected accomplishment a, - 6

⁵⁶ <http://www.saicm.org/Portals/12/Documents/SAICM-List%20of%20indicators%20for%20reporting%20progress.pdf>

Annex M: Problems the Project Seeks to Address

Knowledge of the use of chemicals, and control of their use, including those which are contained in products, is fundamental to the protection of human health and the environment through the sound use and management of chemicals and to the attainment of the 2020 goal of the “strategic approach”⁵⁸ of avoiding significant adverse impacts from chemicals on human health and the environment. The ProDoc articulates the barriers underpinning the business case and impetus for the SAICM project on pages 9-12, and specifically for the elimination of lead in paint, why chemicals in Products persist, and why there is sub-optimal information and knowledge management.

Root Causes and Barriers		
Root causes and barriers to phasing out lead paint	Root causes and barriers to managing Chemicals in Products	Root causes and barriers preventing effective stakeholder engagement and knowledge management
1. Lack of regulations to phase out lead paints, including inadequate capacity in developing countries to introduce and then enforce lead limits at the national level. Support is needed to ensure effective regulation can be drafted and enacted.	1. Lack of transparency in supply chains and limited uptake (particularly in developing and emerging regions) of available tools to monitor and report the presence of hazardous chemicals.	1. Lack of coordinated and full participation of different stakeholders in the SAICM and Beyond 2020 process, particularly among academia.
2. Technical barriers by small and medium sized enterprises (SMEs) wishing to eliminate lead from paint. Small paint manufacturers struggle to comply as they have limited technical capacity or resources to formulate lead free paint.	2. Insufficient economic and market- based incentives for producers to track and manage hazardous chemicals in their products and supply chains. Also, sustainable public procurement and sustainable finance policies and standards tend to focus on other sustainability aspects (energy, water, resource use) and inadequately cover hazardous chemical considerations and restrictions.	3. Lack of context-specific data and high-quality information relating to chemicals management and EPIs to different sector agendas, including specific policy and product sectors, to allow stakeholders to make decisions and take appropriate action on chemical hazards, exposure and management

⁵⁸ The [Strategic Approach to International Chemicals Management](#) has as its overall objective the achievement of the sound management of chemicals throughout their life cycle so that, by 2020, chemicals are produced and used in ways that minimize significant adverse impacts on human health and the environment. This aspiration, referred to as the “2020 goal”, was adopted at the World Summit on Sustainable Development in 2002 as part of the Johannesburg Plan of Implementation.

	3. Lack of regulatory drivers for increased transparency: There is a lack of regulations globally requiring disclosure or phase-out of hazardous chemicals in products, apart from a very few chemicals e.g. POPs or heavy metals. Where they do exist, they are one of the main drivers to increase reporting and tracking of chemicals in supply chains.	3. Lack of interactive features on the SAICM platform for sustained, long-term engagement and connectivity of stakeholders on knowledge related to chemicals management. The current platform provides information but has limited features for stakeholders to share knowledge, experiences, expertise, research and information on specific EPIs.
	4. Lack of quantitative sustainability assessment of hazardous chemicals and their alternatives, leading to 'regrettable substitutions'.	

Lead in Paint

Historically, lead compounds have been added to oil-based decorative and industrial paints and other coatings to enhance colour, reduce corrosion on metal surfaces or shorten drying time. Today, non-lead pigments, driers and anti-corrosive ingredients are widely available for use in most oil-based paints. Deterioration of lead paint, through weathering, peeling or chipping of the paint releases lead particles into dust and soil in and around homes, schools, playgrounds and other locations. Decorative paint for household use has been identified as the main source of children's lead exposure from paints. Lead-containing dust can also be brought into the home on the clothes of those who work in industries where such dust is generated, including paint factories where lead additives are in use.

Lead-contaminated soil and dust are easily ingested, particularly by young children when they play on the floor or outdoors and put their hands or other objects in their mouths. Children also ingest lead if they mouth and chew toys painted with lead paint. Both children and adults can be exposed to lead in paint chips and dust during the removal of old lead paint. There is no known level of lead exposure that is considered safe. Lead can cause permanent damage to the brain and nervous system, resulting in decreased IQ and increased behavioural problems⁵⁹. It can also cause anemia, increase the risk of kidney damage and hypertension, and impair reproductive function. Young children and pregnant women (whose developing fetus can be exposed) are especially vulnerable to the adverse effects of lead. Even relatively low levels of exposure can cause serious and irreversible neurological damage.

⁵⁹ A study published in the [Journal Environmental Health Perspectives](#) in 2013, estimated a total economic loss of \$977 billion (in international dollars) per year across all low- and middle-income countries due to lead-exposure related decreased productivity.

The cost of removing existing decorative lead paint from surfaces in homes, schools and other buildings can be substantial. By contrast, the economic cost is low for eliminating the use of lead compounds in new decorative paints. In fact, many manufacturers have already successfully reformulated their paint products to avoid the intentional addition of lead. According to the paint industry, the reformulation of residential and decorative paints to eliminate lead additives is feasible, and the technical and cost impacts are manageable. Increasingly, paint producers are publicly stating that it is possible to eliminate lead additives in all types of paint.

The elimination of lead exposure at its source is the single most effective action to protect people from the harmful effects of lead. Most industrialized countries adopted laws or regulations to control the lead content of residential and decorative paints decades ago, based on clear findings that lead-containing household paint is a major source of lead exposure in children.

"90 PPM TOTAL LEAD IS THE CONCENTRATION LIMIT RECOMMENDED BY THE MODEL LAW AND GUIDANCE FOR REGULATING LEAD PAINT. IT IS THE LOWEST, MOST PROTECTIVE REGULATORY LIMIT FOR LEAD PAINTS THAT HAS BEEN SET IN COUNTRIES."

- FROM THE MODEL LAW

However, the continued use of lead in paint in many parts of the world, especially in LMICs, remains an important source of exposure. To protect human health, laws, regulations or enforceable standards are needed in every country to stop the manufacture, sale and import of lead-containing paints.

Chemicals in Products

Chemicals that are mutagenic, carcinogenic, toxic to reproduction, endocrine disruptors (EDCs), neurotoxic, persistent, bioaccumulative and toxic (PBT) or very persistent and very bioaccumulative (vPvB) may have serious and often irreversible effects on human health and the environment. Only a few of these chemicals are currently regulated or banned under the Stockholm and Minamata Conventions. These hazardous chemicals are found in consumer products all over the world, resulting in exposures - both inside and outside the supply chain - by workers during manufacture⁶⁰, by consumers during use⁶¹, by informal sectors involved in recycling and disposal with emphasis on women and children⁶², and to the environment via wastewater and sewage⁶³. Toxic contaminants in products can also be a barrier to a shift towards a circular economy, as shown by the example of plastic from products containing brominated flame retardants being recycled into toys, resulting in high levels of chemicals being detected in some cases⁶⁴. While regulators are increasingly confronting the issue, an increasing global market poses

⁶⁰ <https://chemicalchallenge.org/>

⁶¹ Kuang et al (2017) Brominated flame retardants in black plastic kitchen utensils: Concentrations and human exposure implications <https://www.ncbi.nlm.nih.gov/pubmed/28847134>

⁶² Grant (2013) Health consequences of exposure to e-waste: a systematic review, The Lancet Global Health <https://www.sciencedirect.com/science/article/pii/S2214109X13701013>

⁶³ Molander (2012) Are chemicals in articles an obstacle for reaching environmental goals? — Missing links in EU chemical management <https://www.ncbi.nlm.nih.gov/pubmed/22858536>

⁶⁴ IPEN (2017) Toy or Toxic Waste? An analysis of 41 plastic toy and beauty products made from toxic recycling

problems of jurisdictional reach and supply chain management is an impediment. Furthermore, with over 80,000 chemicals in use in commerce, a chemical-by-chemical regulatory approach is simply not tenable to solve the problem.

Production and consumption of goods - including toys, building materials and electronics - are part of global system characterized by large, complex supply chains with constant downward pressure on prices. In many cases, product design and marketing occur primarily in developed countries, with manufacturing outsourced overseas. Demand for low-cost products creates pressure for companies to externalize environmental and social costs, resulting in unsafe working conditions, environmental pollution, and a drive toward using the cheapest and often toxic raw materials, inputs and components.



“PROACTIVE BUSINESSES DO NOT WAIT FOR GOVERNMENT REGULATIONS, PRODUCT RECALLS, AND MARKET DEMANDS BEFORE KNOWING THE CHEMICALS IN THEIR PRODUCTS AND SUPPLY CHAINS AND REDUCE THEIR USE. THEY INTEGRATE KNOWLEDGE OF CHEMICALS IN PRODUCTS AND SUPPLY CHAINS INTO THEIR MANAGEMENT SYSTEMS”

- QUOTATION FROM ‘THE BUSINESS CASE FOR KNOWING CHEMICALS IN PRODUCTS AND SUPPLY CHAINS’

CoC in products can have impacts on human health and the environment along a product’s entire value chain. Measures to address CoC in products need to take into account the whole value chain, and the importance of addressing the issue higher up in the value chain to reduce the burden and fill in gaps across the whole value chain.⁶⁵

Regulatory requirements, customer demands, media attention, non-governmental organization (NGO) advocacy, product recalls, and market opportunities are driving companies to know more about the chemicals in their products and supply chains. Unhappily, the business strategies for managing chemicals in products and supply chains vary widely, especially for those companies and purchasers that are downstream from chemical manufacturing and use chemicals by virtue of the products they purchase. The dominant chemical management strategy for downstream users is a passive one, which is to be compliant with government regulations, i.e., certain chemicals may not be present in a product over defined thresholds, which often does not lead to robust enough measures and oversight to pre-emptively look for chemical risks in their products and in the short term save costs by not investing in systems, staff, or third parties for chemicals management beyond meeting regulatory requirements.⁶⁶

⁶⁵ Project Document.

⁶⁶ [The Business Case for Knowing Chemicals in Products and Supply Chains](#). United Nations Environment Programme, 2014.

Annex N: Audit Trail of Comments



9771 MTR - Audit
Trail of Stakeholder: