

# TERMINAL REVIEW OF THE UNEP/GEF ENABLING ACTIVITY 9454

"DEVELOPMENT OF MINAMATA INITIAL ASSESSMENT AND NATIONAL ACTION PLAN FOR ARTISANAL SMALL-SCALE GOLD MINING IN SIERRA LEONE"



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## About the Evaluation<sup>1</sup>

Joint Evaluation: No

Report Language(s): English

#### Evaluation Type: Terminal Project Evaluation

**Brief Description:** This report is a terminal evaluation of a United Nations Environment Programme (UNEP) Global Environment Facility (GEF) project implemented by UNEP and executed by the United Nations Training and Research (UNITAR) Chemicals and Waste Management Programme. The main objective of the project is to facilitate the ratification and early implementation of the Minamata Convention by promoting the use of scientific and technical knowledge and tools by national stakeholders in Sierra Leone. The project also will enable compliance of Sierra Leone to Article 7 (ASGM) of the Minamata Convention on Mercury. The evaluation sought to assess project performance (in terms of relevance, effectiveness and efficiency), and determine outcomes and impacts (actual and potential) stemming from the project, including their sustainability. The evaluation has two primary purposes: (i) to provide evidence of results to meet accountability requirements, and (ii) to promote learning, feedback, and knowledge sharing through results and lessons learned among UNEP and executing partners including the relevant agencies and stakeholders in the project country.

**Disclaimer.** This report has been prepared by an independent evaluator and is a product of the Evaluation Office of UN Environment. The findings and conclusions expressed herein do not necessarily reflect the views of Member States or the UNEP Senior Management.

<sup>&</sup>lt;sup>1</sup> This data is used to aid the internet search of this report on the Evaluation Office of UNEP Website

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## Project Identification Table

Executing Agency:	UNITAR			
Sub-programme:	Chemicals and Health	Expected Accomplishment(s):	Minamata initial assessment and NAP for ASGM in Sierra Leone	
UN Environment approval date:	23 May 2016	POW 2016-17 Output(s):	(a)(1); (a)(3); (a)(5)	
GEF project ID:	9454	Project type:	EA	
GEF Operational Programme #:	2	Focal Area(s):	Mercury	
GEF approval date:	1 June 2016	GEF Strategic Priority:	Mercury	
Expected start date:	July 2016	Actual start date:	31 October 2016	
Planned completion date:	30 November 2018	Actual completion date:	March 2020	
Planned project budget at approval:	\$ 766,500	Actual total expenditures reported as of June 2020:	\$ 685,000	
GEF grant allocation:	\$ 700,000	GEF grant expenditures reported as of June 2020	\$ 685,000	
Project Preparation Grant - GEF financing:	\$ 66,500	Project Preparation Grant - co- financing:	n/a	
Expected Medium-Size Project/Full-Size Project co- financing:	n/a	Secured Medium-Size Project/Full- Size Project co- financing:	n/a	
First disbursement:	31 October 2016	Date of financial closure:		
No. of revisions:	1	Date of last revision:	12 February 2019	
No. of Steering Committee meetings:	n/a	Date of last/next Steering Committee meeting:	Last: Next :	
Mid-term Review/ Evaluation (planned date):	n/a	Mid-term Review/ Evaluation (actual date):	n/a	
Terminal Review (planned date):	January 2020	Terminal Review (actual date):	March 2020	
Coverage - Country(ies):	Sierra Leone	Coverage - Region(s):	Africa	
Dates of previous project phases:	n/a	Status of future project phases:	n/a	

## **Executive Summary**

- This review is the output of the Terminal Review process of the enabling activity (EA) entitled "Development of Minamata Initial Assessment (MIA) and National Action Plan (NAP) for Artisanal and Small-scale Gold Mining (ASGM) in Sierra Leone", executed by UNITAR and co-executed with the government (Environment Protection Agency and other relevant agencies) of Sierra Leone. The total budget was 700,000 USD. The UN Environment Programme (UNEP)/ Global Environment Facility (GEF) budget was 700,000 USD and in-kind co-financing from the national government.
- 2. The objective of the MIA project was to facilitate the ratification and early implementation of the Minamata Convention by the use of scientific and technical knowledge and tools by national stakeholders thereby setting a baseline of data about the presence of mercury in different environmental media through the inventory of emissions and releases. The assessment also aims to reinforce the national coordination mechanism on chemicals management, as it is currently operational in the country, by ensuring specific mercury considerations are also addressed without duplicating efforts. The AGSM NAP in Sierra Leone will present a roadmap on how Sierra Leone will be able to comply with Article 07 of the Minamata Convention.
- 3. The project covering both MIA and NAP development in Sierra Leone had six components: Component 1: National information exchange, capacity building and knowledge generation; Component 2: Strengthening of coordination mechanisms and organization of process; Component 3: Assessment of the national infrastructure and capacity for the management of mercury, including national legislation; Component 4: Development of a mercury inventory, a national overview of the ASGM sector, and strategies to identify and assess mercury-contaminated sites; Component 5: Identification of challenges, needs and opportunities to implement the Minamata Convention on Mercury; and Component 6: Preparation, validation, and endorsement of MIA and NAP at national level, implementation of awareness raising activities, and dissemination at national level.

## **Review Methodology**

4. The review analyzed project documentation, country-produced assessment reports, and carried out interviews via telephone and in person, and used electronic surveys with relevant persons of the project executing agency (UNITAR), the MIA technical officer, the reviewer of the NAP global component, and stakeholders in Sierra Leone (national project coordinators) in consultation with the task manager.

### Summary of Evaluation Criteria, Assessment and Ratings

Criterion	Rating
A. Strategic Relevance	Highly Satisfactory
1. Alignment to UN Environment MTS and POW	Highly satisfactory
2. Alignment to GEF/Donor strategic priorities	Highly satisfactory

3. Relevance to regional, sub-regional and national environmental	Satisfactory
Priorities	
4. Complementarity with existing interventions	Satisfactory
B. Quality of Project Design	Satisfactory
C. Nature of External Context	Favourable
D. Effectiveness	Satisfactory
1. Achievement of outputs	Satisfactory
2. Achievement of direct outcomes	Moderately satisfactory
3. Likelihood of impact	Likely
E. Financial Management	Satisfactory
1.Completeness of project financial information	Satisfactory
2.Communication between finance and project management staff	Satisfactory
3. Compliance with UN Environment standards and procedures	Satisfactory
F. Efficiency	Satisfactory
G. Monitoring and Reporting	Satisfactory
1. Monitoring design and budgeting	Highly satisfactory
2. Monitoring of project implementation	Satisfactory
3.Project reporting	Complete
H. Sustainability	Moderately Likely
1. Socio-political sustainability	Highly likely
2. Financial sustainability	Moderately likely
<ol> <li>2. Financial sustainability</li> <li>3. Institutional sustainability</li> </ol>	Moderately likely Highly likely
2. Financial sustainability 3. Institutional sustainability I. Factors Affecting Performance	Moderately likely Highly likely Satisfactory
<ol> <li>2. Financial sustainability</li> <li>3. Institutional sustainability</li> <li><b>I. Factors Affecting Performance</b></li> <li>2. Quality of project management and supervision</li> </ol>	Moderately likely Highly likely Satisfactory Satisfactory
2. Financial sustainability 3. Institutional sustainability  I. Factors Affecting Performance 2. Quality of project management and supervision 3. Stakeholders participation and cooperation	Moderately likely         Highly likely         Satisfactory         Satisfactory         Highly satisfactory
<ol> <li>2. Financial sustainability</li> <li>3. Institutional sustainability</li> <li><b>I. Factors Affecting Performance</b></li> <li>2. Quality of project management and supervision</li> <li>3. Stakeholders participation and cooperation</li> <li>4. Responsiveness to human rights and gender equity</li> </ol>	Moderately likely         Highly likely         Satisfactory         Satisfactory         Highly satisfactory         Moderately satisfactory
2. Financial sustainability 3. Institutional sustainability  I. Factors Affecting Performance 2. Quality of project management and supervision 3. Stakeholders participation and cooperation 4. Responsiveness to human rights and gender equity 5. Country ownership and driven-ness	Moderately likely         Highly likely         Satisfactory         Satisfactory         Highly satisfactory         Moderately satisfactory         Satisfactory         Satisfactory
<ul> <li>2. Financial sustainability</li> <li>3. Institutional sustainability</li> <li>1. Factors Affecting Performance</li> <li>2. Quality of project management and supervision</li> <li>3. Stakeholders participation and cooperation</li> <li>4. Responsiveness to human rights and gender equity</li> <li>5. Country ownership and driven-ness</li> <li>6. Communication and public awareness</li> </ul>	Moderately likely         Highly likely         Satisfactory         Satisfactory         Highly satisfactory         Moderately satisfactory         Satisfactory         Satisfactory         Satisfactory         Satisfactory         Satisfactory         Satisfactory         Satisfactory         Satisfactory         Satisfactory

### Key Findings, Lessons Learned and Recommendations

- 5. The MIA and NAP project would facilitate Sierra Leone's ratification and early implementation of the Minamata Convention of Mercury by providing key stakeholders with the scientific and technical knowledge and tools. The enabling project is satisfactory overall with the delivery of key outputs (completed MIA and ASGM NAP, assessment of contaminated sites, strengthening of the National Coordination Committee, awareness and communication) that would benefit Sierra Leone in its ratification and implementation of the Minamata Convention and its sound management of chemicals/mercury and waste.
- 6. The project design was **satisfactory**, linking the project to UNEP's Medium-Term Strategy and Programme of Work, as well as to GEF 5 Strategic Priorities. Relevance to national priorities and needs

was highlighted especially in the ASGM sector. The project highlighted the links to Sierra Leone's UN Development Assistance Framework (UNDAF) and legislative framework especially on chemicals and waste. The **strategic relevance** places the project in the context of UNEP's mandate and GEF's priorities as well as the national priorities and is **satisfactory** 

- 7. The strengths of the design include the strategic relevance, stakeholder analysis, background on Sierra Leone's mercury and ASGM activities, the governance and supervision arrangements, and the risk identification and social safeguards. The governance and supervision arrangements clearly identified how the project was to be executed and monitored, sharing and defining stakeholder roles and responsibilities, to encourage sound implementation. The financial planning was sound and did not display any deficiencies, and the funding was budgeted coherently for the timeline and outputs of the project. The financial mechanisms of the project at the design stage were well prepared, reasonable and transparent, contributing to its sustainability and overall success. Moreover, the project had a clear Theory of Change presented in narativeform. Stakeholder analysis was robust at the design phase where all relevant government agencies, civil society and mining communities to be engaged were identified. This facilitated a sense of national ownership of the project. Moreover, the very active national coordinators (MIA and NAP) were all motivated and driven to deliver the outcomes. Gender and human rights were highlighted in the project document.
- 8. In terms of consideration for **external factors** that might affect the project, the project document did not mention political instability nor risk of disasters that made the project **highly favourable**.
- 9. The project is satisfactory for effectiveness, despite delays in project execution. The delays were due to the need for experts from EA to train local partners on the inventory methodology, challenges in obtaining meaningful data from Ministries, the need for more time to conduct national consultations/validation and to finalize the reports on challenges and opportunities as well as in drafting the final MIA and NAP. Sierra Leone also had a sudden change in government that was not foreseen in project preparation. The extension however did not affect the delivery of project outputs. The project made use of existing national coordination mechanism on the sound management of chemicals and waste contributing to its efficiency.
- 10. The project was granted extension upon request of the EA to the IA, and the project was able to deliver the outputs that led to the desired outputs with the following results: The National Coordination Committee was enhanced, and all stakeholders were engaged including civil society via the Stakeholder Advisory Group. The project delivered on the assessment of national infrastructure capacity on mercury management, including relevant national legislations and multilateral environment agreements on chemicals and waste where Sierra Leone is signatory. Mercury inventory results were also delivered.
- 11. Achievement of outcomes and outputs is satisfactory and could be attributed directly to the project which is "enabling" in nature, to the good quality of project design, management and supervision, stakeholders' participation, communication and public awareness. Responsiveness to human rights and gender equity was highlighted in the ASGM NAP. With the delivery of Sierra Leone's MIA and submission of the ASGM NAP to the Minamata Convention secretariat, the likelihood of impact is moderately likely.

- 12. The project ensured **sustainability** by training national focal points and from the academe on how to do mercury inventories. While socio-political and institutional sustainability is likely, financial sustainability after project completion would be moderately unlikely. There is a need for a regional framework to ensure the project's sustainability by encouraging countries in the subregion (South Africa Development Community) to share data, experiences, and information (such as private sector engagement) to ensure financial sustainability.
- 13. The project's **strengths** have been the smooth collaboration among the government agencies and stakeholders (especially the mining community) in Sierra Leone that delivered on the outputs in both MIA and NAP. There was also regular communication between the executing agency (UNITAR) and the co-executing partner (Sierra Leone Environment Protection Agency) as well as with the implementing agency (UNEP) addressing issues and concerns during implementation. The selection of the appropriate project national coordinators for the MIA and NAP, both from the national government and academe was also considered a strength of the project.
- 14. This close working relationship among stakeholders in Sierra Leone is currently sustained by a "National Chemicals Forum" that includes government agencies, local government authorities, civil society, academe, local mining communities. This group currently communicates regularly via WhatsApp and other forms of communication. The stakeholder analysis at the design phase was thorough and is highly satisfactory, as it was carried out in consultation with the national government and included an evaluation of the interests/influences and potential roles of all relevant stakeholders. The robust stakeholder analysis in the design phase facilitated the engagement in project execution.
- 15. In terms of the process and quality of delivering the MIA and NAP, the project benefitted from a series of reviews by both the EA and the IA "peer reviewers". Furthermore, the GEF ASGM global component (component 1) that had very useful products also provided valuable review and input into the final NAP products.
- 16. The project's **weaknesses** have been related to time management, for multiple reasons such as delay in identifying local, technical experts to be trained for the mercury inventory, need for meaningful data from relevant Ministries, and the need for more time to validate the MIA and NAP. The unforeseen change in government, caused further delays that resulted in delays in project reporting and consequently delays of fund release from IA to EA.
- 17. While the gender and socio-economic dimensions and links to poverty alleviation was highlighted in the project document, there was no emphasis of gender and socio-economic dimension in the completed MIA. Nevertheless, gender considerations were highlighted in the ASGM NAP. While mention was made of the vulnerable populations at risk (women, youth, and children) in the ASGM NAP, no mention was made of the links to human rights or the effect on indigenous peoples.

#### 18. Lessons Learned

**Lesson 1:** Engaging the EA and national EA as well as key stakeholders at the project design stage will ensure better understanding of the project outputs and outcome. These pre-contract meetings/information sharing could facilitate a sense of ownership and enable addressing country specific needs for project execution. This is important since the government of Sierra Leone (Environment Protection Agency) was a co-executing partner and its needs, such as capacities to carry out mercury inventories, could have been expressed upfront. The project was designed by the IA as

a standard "enabling" project but would have benefited from consultation or pre-implementation meetings with the EA and national co-executing partners to address country -specific needs such as having a realistic project timeframe given the political instability and armed conflict in the DRC. The Executing Agency must hold pre-implementation information/expectation setting sessions with the country. It is important to engage the EA and stakeholders in the project design stage to have a sense of ownership of the project upfront.

**Lesson 2:** Specifying activity and monitoring timelines in contracts/agreements between the IA and EA and with the partner executing agency (national EA) will avoid project extensions and ensure timely delivery of outputs. Conduct of simultaneous activities could be considered. This will avoid project extensions and ensure timely delivery of outputs.

**Lesson 3:** Gender dimensions of chemicals/mercury should be included in the assessment. While the gender and the role of women was highlighted in the MIA and ASGM NAP, there was no emphasis on gender ( such as the role of women and the need for data disaggregated by sex) data in the MIA. The ASGM NAP also needs to highlight links to human rights and impact on indigenous population.

**Lesson 4:** The EA needs to prioritize identification of relevant country partners to be trained and do country-based work on the inventory. Delays in the mercury inventory could be attributed to delays in identifying and training country partners on how to do mercury inventory. Delays were also due to challenges in obtaining meaningful and reliable data such as on energy consumption, products and waste from the relevant Ministries..

Data is imperative to make meaningful and informed decisions on chemicals and waste management in general, and on mercury management in particular.

**Lesson 5**: Unforeseen events such as the change in government further contributed to delay in project execution. The project would have benefitted from a more realistic timeframe.

**Lesson 6**: Constant and regular communication between the project IA and EA addressing issues and concerns throughout execution contributes to the positive delivery of outputs. The smooth collaboration among the government agencies and stakeholders (especially the mining community) in Sierra Leone delivered on the outputs in both MIA and NAP. The selection of the appropriate project national coordinators for the MIA and NAP, both from the national government and academe also contributed to output delivery.

**Lesson 7**: Project sustainability could be ensured by having socio-political and institutional sustainability such as in the case of Sierra Leone. Training of local staff in doing the technical inventories enables sustainability. However, financing sustainability to implement its plan may be moderately unlikely. Sierra Leone and countries in the subregion (West Africa) should be encouraged to share data, experiences, and lessons learned that could be source of information for financing sustainability.

### 19. Recommendations

Taking into account the scope of the evaluation and based on the main findings, conclusions and lessons learned, the recommendations that follow are addressed to UNEP as Implementing Agency, UNITAR as executing agency, and to national coordinators to help in the implementation and execution of future projects of similar nature, I,e, "enabling projects" dealing with initial assessments and drafting of national action plans, as well as for countries with a similar socio-economic- political background.

#### At the design or pre-implementation phase of the project

**Recommendation 1 for the IA and EA:** The EA and its executing partner (in this case the national government) needs to be in contact even before the start of project activities in order to share expectations and express needs such as on building technical capacities of country partners. The EA, its executing partner and stakeholders need to be engaged in the project design stage to have a sense of ownership of the project upfront.

**Recommendation 2 for the IA EA, and national project coordinators**: In contracts and agreements, the activity and reporting timelines which has implications in fund release must be clearly specified. Simultaneous activities by task teams that contribute to efficiency could be considered. Timely reporting from project coordinators to the EA and consequently to the IA will enable immediate fund release. This will avoid project extensions and ensure timely delivery of projects.

**Recommendation 3 for IA and EA**: Gender, socio-economic (indigenous population) and legal (human rights) experts must be engaged early on in the MIA and NAP. Costing for such experts must be included in project budget.

**Recommendation 4 for IA and EA**: A more realistic timeframe will benefit the project. This will allow time for the EA to identify local partners to be trained on conducting inventories, as well as for coexecuting partners to obtain more meaningful data from relevant Ministries. Emphasize the need for meaningful data at the inter-agency meetings while engaging the relevant Ministries and sectors Consider engaging the private sector and academe who could also facilitate in obtaining relevant data for chemicals/mercury management. Similarly, the design of MIAs should allow for more specific data gathering activities.

#### During the implementation phase of the project,

**Recommendation 5 for the EA and national project coordinators:** Unforeseen events such as the sudden change in government should be factored in the project timeframe.

**Recommendation 6 for the EA**: Constant and regular communication between the EA and the national stakeholders should be maintained throughout the project to ensure that technical needs and training are discussed and planned. This will ensure meeting deadlines, hence avoiding delays.

#### Post- project implementation:

**Recommendation 7 for the national project coordinators**: Countries in the subregion (West Africa) should be encouraged to share data, experiences, and lessons learned that could be source of information for financial sustainability. Funding for the national implementation plan is not part of this "enabling" project. Subregional collaboration and sharing of data an experience would be

valuable and could be facilitated by UNEP and UNITAR which have both carried out similar projects in other countries in the sub-region.

### I. Introduction

- 20. This report presents the terminal review of the **enabling** activity project entitled "Development of Minamata Initial Assessment and National Action Plan for Artisanal Small-scale Gold mining in Sierra Leone". The objective of the project is to facilitate the ratification and early implementation of the Minamata Convention by promoting the use of scientific and technical knowledge and tools by national stakeholders in Sierra Leone. While Sierra Leone ratified the Minamata Convention of Mercury early on at the start of the project, the undertaking of an MIA is the first step towards implementing the Convention; the objective of which is to protect human health and the environment from anthropogenic emissions and releases of mercury and its compounds. Sierra Leone would benefit from new and updated information about the mercury situation in the country and from increased capacity in managing the risks of mercury, in particular from the ASGM sector. Sierra Leone would also be in compliance with the Article 7 (ASGM) of the Minamata Convention. The sharing of experiences and lessons learned throughout the project is also expected to be an important contribution to other similar countries within region.
- 21. Sierra Leone signed the Minamata Convention of Mercury in August 2014 and on 17 November 2015, the Strategic Approach to International Chemicals Management (SAICM) national focal point in Sierra Leone notified the Interim Secretariat of the Minamata Convention on Mercury, in accordance with article 07 of the Minamata Convention, that artisanal and small-scale gold mining and processing was more than insignificant within the country. Sierra Leone ratified the Convention on 1 November 2016, which was also date of the actual start of the project. The ratification may have been facilitated by the project preparation phase of this project. The completed MIA is instrumental in informing the current implementation of the Minamata Convention on Mercury in Sierra Leone while the ASGM NAP is facilitating compliance to Article 7 (ASGM) of the Minamata Convention on Mercury. The project is satisfactory with completed MIA and ASGM NAP that will benefit Sierra Leone in its implementation of the Convention.
- 22. The project aimed at early ratification and implementation of the Minamata Convention on Mercury was endorsed by the GEF CEO in June 2016, with an initial planned duration of 24 months, from the first disbursement of funds in October 2016. The project is aligned with Sierra Leone's UN Development Assistance Framework (UNDAF) -now known as UN Sustainable Development Cooperation Framework- environmental priorities/outcomes" in particular on pillars 2 (Managing Natural Resources) and 5 (Labor and Employment) highlighting equal labor opportunities for women and men. The project is also aligned with UNEP's Programme of Work (PoW) under "the Chemicals and Waste Subprogramme" in UNEP's Mid-Term Strategy (MTS) by increasing the country's capacity to manage chemicals and waste and by increasing collaboration between the secretariats of chemicals and waste related multilateral environmental agreements. The project experienced a delay in the disbursement of funds in the early stages of the project, but this did not affect the overall completion of project activities although a revision was done in January 2019 to allow more time for national consultations and delivery of the MIA and NAP. The Sierra Leone project was implemented by the United Nations Environment Programme (UNEP), with funding from the Global Environment Fund (GEF) and executed by the United Nations Training and Research (UNITAR), that has extensive

experience on chemicals and waste management, in particular on mercury management, following the signing of the Convention. The Sierra Leone Environment Protection Agency was the project coexecuting agency, enabling ownership of the project since its inception. In June 2020, around 98% (\$685,000) of the total (\$ 700,000) UNEP/GEF budget has been disbursed. This final review is addressed to the government and stakeholders of Sierra Leone, the executing agency, the implementing agency and other countries or agencies that could benefit from the experience of initial assessments of the Minamata Convention and in drafting their ASGM National Action Plan.

## II. The Review

- 23. The review was carried out from January to March 2020 by an independent consultant, Desiree M. Narvaez, under the supervision of Ludovic Bernaudat, Task Manager of the GEF team at the Chemicals and Health Branch of the Economy Division of UNEP.
- 24. The review has two main objectives, first to provide evidence of results to meet accountability requirements, and second to identify lessons of operational relevance for future project formulation on the regional level, and for the early implementation of the Minamata Convention. This is to be done through promoting operational improvement, learning and knowledge sharing between national stakeholders. To be effective, the review had a particular focus on how and why the results of the project were achieved, beyond displaying what the results were. Therefore, the evaluator aimed to differentiate between what would happen in the absence of the project and what happened as a result of the project.
- 25. The review had aimed to be as participatory as possible, and the evaluator was in contact with the Minamata and ASGM focal points of Sierra Leone. It was not possible to arrange travel to Sierra Leone due to lack of time and funding, therefore most of the interviews were conducted via telephone and correspondence by email and on-line survey. Interviews were done with the executing agency (UNITAR), with the technical experts on the MIA and NAP, and with the staff of the global component. The report of the peer reviewer of the ASGM National Action Plan was also reviewed.
- 26. The interviews, the desk review of all available project documentation and the online questionnaire were the main methods used in verifying the outcomes and outputs of the project components. Confidentiality was maintained by not divulging names nor information to other interviewees. At least 10 stakeholders were invited to the interviews and on-line survey, but only 3 responded to the on-line survey. The EA was interviewed on several occasions. Throughout the review process and in the compilation of the Final Review Report, efforts have been made to represent the views of both mainstream and more marginalised groups. All efforts to provide respondents with anonymity have been made. The performance of the project was evaluated in terms of relevance, effectiveness and efficiency, as well as its actual and potential outcomes and impacts and their sustainability. It also consisted of a likelihood of impact assessment, identifying intended and unintended effects. The factors and processes affecting project performance were also assessed, relating to preparation and readiness, quality of management and supervision, stakeholder participation, public awareness, country ownership and responsiveness to human rights and gender equity. Finally, the project financing and the monitoring and evaluation systems were reviewed. All findings in this report are based on referenced evidence, and the sources were crossed checked to the extent possible.
- 27. Key strategic questions on the project such as ratification of the Minamata Convention, country awareness of its obligations under the Convention, delivery of outcomes in a cost-effective manner as

well as articulation of the NAP are included in the Conclusions section of this report.

## **III: The Project**

#### Context

- 28. The project is an **enabling activity** in nature, and the process of the MIA and the ASGM NAP were developed as a standardized process in order to be applicable to any country. The project was designed to assess the situation with regard to the levels of mercury in Sierra Leone and was therefore a baseline establishing project to be considered as the basis for future projects relating to mercury management.
- 29. The main objective of the project was to facilitate the ratification and early implementation of the Minamata Convention by promoting the use of scientific and technical knowledge and tools by national stakeholders in Sierra Leone. While Sierra Leone ratified the Minamata Convention early on project execution, the undertaking of an MIA is the first step towards implementing the Minamata Convention on Mercury; the objective of which is to protect human health and the environment from anthropogenic emissions and releases of mercury and its compounds. Sierra Leone would benefit from new and updated information about the mercury situation in the country and from increased capacity in managing the risks of mercury, in particular from the ASGM sector. Sierra Leone would also be in compliance with the article 7 (ASGM) of the Minamata Convention. The sharing of experiences and lessons learned throughout the project is also expected to be an important contribution to other similar countries within the region.

#### **Background of Sierra Leone**

30. Sierra Leone is a country on the West African coast lying between latitudes 6-10° North and longitudes 10.27-13.30° West. It has an area of 71,170 square kilometres (km<sup>2</sup>) and a population of 7,092,113 (Statistics Sierra Leone, 2016)<sup>2</sup>. Sierra Leone remains among the world's poorest countries, ranking 184th out of 189 countries in the Human Development Index in 2017. Decades of economic decline, 11 years of armed conflict and the more recent Ebola crisis have had dramatic consequences on the economy. Poverty remains widespread with more than 60% of the population living on less than \$1.25 a day and unemployment and illiteracy levels remain high.<sup>3</sup> This is particularly so among youth, with approximately 70% of them unemployed or underemployed. <sup>4</sup> This remains a significant challenge, especially when considering that Sierra Leone has a young population, with 63% of the population below the age of 25 years, and that the country's population is expected to double by the end of the century.<sup>5</sup>

<sup>&</sup>lt;sup>2</sup> <u>https://www.statistics.sl/</u>

<sup>&</sup>lt;sup>3</sup> UNDP, 2016. Human Development Report 2016. Human Development for Everyone.

http://hdr.undp.org/sites/default/files/HDR2016\_EN\_Overview\_Web.pdf

<sup>&</sup>lt;sup>4</sup> UNDP's web page of Sierra Leone. <u>http://www.sl.undp.org/content/sierraleone/en/home/countryinfo/</u>. Accessed on 23/03/2018.

<sup>&</sup>lt;sup>5</sup> <u>https://esa.un.org/unpd/wpp/publications/files/key\_findings\_wpp\_2015.pdf</u>. Accessed on 29/03/2018.

- 31. As the population of the Sierra Leone grows, and its economy is slowly transforming towards industrialization, the stress of the environment and natural resources is increasing, and the issue of mercury management is becoming a priority. In particular, ASGM, mercury products and waste management, and energy consumption are the main sources of mercury emissions and releases to the environment in the Sierra Leone.
- 32. Mining and agricultural are the main sources of economic activity in Sierra Leone. Mining activities are the major cause of deforestation and land degradation. Typical impacts include soil erosion, siltation and contamination of river basins/tidal creeks and displacements of communities. Heavy siltation of riverbeds and tidal creeks reduce coastal coral, cause flooding and other social impacts. Other environmental challenges are climate change, loss of biodiversity, lack of urban planning, and management of waste.
- 33. Mercury can be found as a trace element in several deposits and can also be used in the extraction of some minerals. The key mineral resources in Sierra Leone are diamonds, rutile, bauxite, iron ore, gold and small amounts of limonite.



#### Map 1: Map of ASGM Operations in Sierra Leone

34. For the MIA, the main challenge was the lack of reliable data in order to produce a robust initial assessment. Nevertheless, the MIA project outputs have been designed to fill the gaps in scientific, institutional and legal data.

#### Institutional, political, and governance structure

35. Sierra Leone is committed to support global action in the protection of the environment and of human health. It has demonstrated political will as a signatory in Chemicals and Waste Conventions. Despite its relatively short contemporary period of stable democracy, Sierra Leone is a signatory and Party to a number of international environment and health-related conventions/protocols: Basel, Rotterdam

and Stockholm Conventions, UN Framework on Climate Change, UN Convention on Biodiversity, Montreal Protocol, Bamako Convention, among others.

- 36. The background section of the project document takes into consideration Sierra Leone's current state of environmental framework, legal framework, institutional capacity and national priorities. It also includes how the project could contribute to its UN Development Assistance Framework (UNDAF) now called UN Sustainability Development Assistance Framework- pillars 2 (Managing Natural Resources) and 5 (Labour and Employment) highlighting equal labour opportunities for women and men. Key legislations that are relevant to the project are highlighted: Establishment of Sierra Leone Chemicals Control and Management Department, Environmental Impact Assessments on mining, the Fishery Products Regulations, Public Health Ordinance, Forestry Act, and the Chemicals and Pesticides Law.
- 37. Sierra Leone Environment Protection Agency (EPA-SL) has initiated awareness raising on mercury and its impacts on health and environment; as well as impacts of the use of mercury in ASGM, recognized as an illegal activity. Estimations of mercury consumption in ASGM and emissions as well as a 2010 mercury inventory were available. The project was designed to build on these pre-existing efforts and to strengthen any efforts related to the sound management of chemicals in waste.
- 38. Sierra Leone's signing of the Minamata Convention on Mercury is driven by the above political factors. The current MIA and ASGM NAP projects certainly contribute to Sierra Leone's Medium-term National Development Plan 2019-2023.
- 39. During the implementation of the project, the Sierra Leone EPA as co-executing agency, constituted multi-stakeholder committees to execute the project and to help raise awareness among the government officials as well as the private sector and civil society.
- 40. Politically, despite the reorganization in government (critical national consultants that had been engaged in the project were later appointed as ministers and executive chairs of government), which contributed to delays in project delivery, Sierra Leone remained stable. Project outputs indicated high level of engagement from government institutions. The project highlights the socioeconomic benefits such as the benefits of the project on the poor in Sierra Leone ASGM communities and describes how vulnerable and at-risk populations in Sierra Leone could be identified. The project also considers gender especially the socio-economic role of women in ASGM activities and the biological risk to women especially during pregnancy. The project specifies opportunities for women participation in national coordinating committees especially in the NAP. However, gender considerations such as the role of women and sex-disaggregated data in the MIA needs to be improved.

## **Results Framework: Objectives and Components**

41. The MIA assessed the country's baseline conditions in terms of presence of mercury in the environment, as well as the existing legislative and institutional frameworks. The assessment included the identification of all mercury sources and releases using UNEP's Toolkit levels 1 and 2, setting a baseline that allows for future monitoring of progress in the implementation of the Convention. The assessment also aimed to reinforce the national coordination mechanism on chemicals management, as it is currently operational in the country, by ensuring that specific mercury considerations are also

addressed without duplicating efforts. The AGSM NAP in Sierra Leone would present a roadmap on how Sierra Leone will be able to comply with Article 7 of the Minamata Convention.

42. The project had six outcomes, organized in six major components. Each outcome had its own expected outcome and outputs with specific activities to achieve the desired output and outcome.

#### **Component 1: National information exchange, capacity building and knowledge generation** Expected Outcome:

Enhanced communication, support and training facilitate the development of the MIA and NAP and build the basis for future cooperation for the NAP implementation.

#### Expected Output:

Technical support and global coordination provided ensuring capacity building, information exchange, consistent and comparable MIAs and NAPs and the identification of lessons learned and good practices at national level.

#### Component 2: Strengthening of Coordination Mechanism and organisation of process

Expected Outcome:

Sierra Leone makes full use of enhanced existing structures and information available dealing with mercury management to guide ratification and early implementation of the Minamata Convention.

#### Expected Output:

Technical support provided to strengthen the National Coordination Mechanism and organization of process for MIA and NAP development.

## Component 3: Assessment of the national infrastructure and capacity for the management of mercury, including national legislation

Expected Outcome:

Full understanding of comprehensive information on current infrastructure and regulation for mercury management enables Sierra Leone to develop a sound roadmap for the ratification and early implementation of the Minamata Convention.

#### Expected Output:

Assessment prepared on the national infrastructure and capacity for the management of mercury, including national legislation.

## Component 4: Development of a mercury inventory, a national overview of the ASGM sector, and strategies to identify and assess mercury-contaminated sites

Expected Outcome:

Enhanced understanding of mercury sources and releases facilitates the development of national priority actions.

#### Expected Output:

Mercury inventory developed and strategies to identify and assess mercury contaminated sites.

## Component 5: Identification of challenges, needs and opportunities to implement the Minamata Convention on Mercury

Expected Outcome:

Improved understanding of national needs and gaps in mercury management and monitoring enables a better identification of future activities.

Expected Output:

Technical support provided for identification of challenges, needs and opportunities to implement the Minamata Convention on Mercury.

## Component 6: Preparation, validation and endorsement of MIA and NAP, implementation of awareness raising activities and dissemination of results at the national level

Expected Outcome:

Sierra Leone key stakeholders made full use of the MIA and related assessments and the NAP for the ASGM sector leading to the ratification and early implementation of the Minamata Convention on Mercury.

#### **Expected Output:**

Technical support provided for preparation and validation of National MIA report, the NAP for the ASGM sector, and implementation of awareness raising activities and dissemination of results.

## Milestones/Key Dates in Project Design and Implementation

43. Project GEF CEO endorsement: July 2016

Actual start on November 2016 was due to delays in administrative processes in both the implementing agency and the executing agency. In addition, the national government (Sierra Leone EPA) was co-executing agency and had to do internal institutional arrangements to start the project.

- 44. Mid-term Evaluation (MTE) date: Because of the scale and nature of the project as an Enabling Activity, the project document does not require an MTE, therefore the monitoring and evaluation plan consists only of the bi-annual progress reports from the executing agency, the independent financial audit and the independent terminal review. Project extensions: The Project Cooperation Agreement (PCA) extension was signed in February 2019, allowing the contract to remain in force until February 2020.
- 45. Project completion date: Planned for August 2018, Actual completion date: March 2020

### Implementation Arrangements

46. UNEP acted as the UN implementing agency for this project, with financing from the GEF in accordance with Article 13 on the financial mechanism of the Minamata Convention; included in the GEF V Focal Area Strategy document under the Strategic Objective 3 Pilot Sound Chemicals Management and Mercury Reduction, specifically under outcome 3.1 to build country capacity to effectively manage mercury in priority sectors. UNITAR is the executing agency and the Sierra Leone EPA was the co-executing partner. UNITAR has track record in delivering projects on the management of chemicals, and mercury in particular. Bi-annual progress and financial reports have been submitted by UNITAR to the UNEP/GEF task manager. The project agreement requires a certified final statement of accounts to be carried out by an independent audit entity, under the responsibility of the executing agency.

## **Project Financing**

Table1. Original, revised and actual expenditure project budget and expenditure ratio by component

Component	Original budget	Revised budget	Expenditure as of	Expenditure ratio
			end of Q2 2020	(actual/revised)
Component 1	\$67,000	\$82,300	\$61,944	0.75
Component 2	\$19,000	\$53,257	\$26,357	0.49
Component 3	\$47,500	\$59,551	\$47,500	0.8
Component 4	\$349,500	\$257,613	\$352,802	1.37
Component 5	\$32,500	\$55,000	\$32,500	0.59
Component 6	\$95,864	\$103,543	\$98,942	0.96
Project Management	\$63,636	\$63,636	\$64,136	1.01
M&E	\$25,000	\$25,000	\$819	0.03
Total	\$700,000	\$700,000	\$685,000	0.98

47. The balance of 15,000 USD will be used for the project terminal evaluation fees.

## **Project partners**

48. The key project partners were:

- UN Institute for Training and Research (UNITAR) as the executing agency
- UN Environment Programme (UNEP) as the implementing agency
- Sierra Leone Environment Protection Agency as a co-executing national partner
- The GEF as a financing partner
- The Minamata Convention secretariat; joint BRS secretariats
- Global Mercury Partnership

## Changes in Design during Implementation

49. The project's budget was revised upon the extension request received in February 2019 from the executing agency and the co-executing national partner. A revision to the work plan also accompanied the project extension, and it consisted of planning for a regional (i.e. regional level within the country) and national lesson learnt workshops and to allow completion of drafting the MIA and NAP document.

## IV: Theory of Change of the Project

50. A reconstructed Theory of Change (ToC) shown in Figure1 below was prepared based on project documentation and reviewed with project staff during the review process. It demonstrates the logical sequence of intended results from immediate outputs and intended outcomes, feeding into the longer-term impact. Project activities were not included in the ToC reconstruction diagram.

- 51. Because of the nature and scope of this project, there is one major pathway of outcomes to impact identified, along with one intermediate state. Impact pathway 1 - Data Collection and Establishment of Baseline Institutional Framework: From outcomes 1, 2, 3,4,5, and 6 to project intermediate state. The fulfilment of the project intermediate state requires the success of all six main outcomes, and each outcome is linked to the next in a causal/continuous sequential logic: In order for Sierra Leone to implement the Minamata Convention and comply with article 7 on ASGM, it must first assess and enhance its existing information and capacities on ASGM (Outcome1), then it must have a complete understanding and baseline assessment of its institutional, regulatory/legal and mercury management capacities for MIA (Outcome2), as well as a full understanding of its mercury capacities in order to draft is MIA and NAP (Outcome 3). These three outcomes provide the first stages and baseline information in order to begin collecting quantitative and qualitative data using the UNEP Mercury Inventory Toolkit levels 1 and 2 and ASGM sector leading to enhanced understanding of mercury releases and emissions (Outcome 4), and in turn, the information provided by the Inventory leads to an improved understanding of the national priorities and the institutional and regulatory gaps. An improved understanding of national needs and gaps in mercury management and monitoring enabled a better identification of future activities (Outcome 5). Consequentially, at this stage, the project has reached the intermediate state (referred to as Outcome 6 in the project document) at which all relevant stakeholders have the necessary information through the MIA and NAP report so as to take targeted action in filling the gaps in legislation and institutional capacity, while continuously working together to reduce and stop mercury releases to the environment, and address all issues that arose during the undertaking of the inventory.
- 52. All of the above consequentially leads to the implementation of the Minamata Convention and compliance to article 7 on ASGM, which directly supports the project's global environmental benefits of reduced mercury emissions and releases and decrease in mercury related diseases and environmental degradation. A key assumption is that key stakeholders are willing to implement the Minamata Convention. An important driver is the heightened awareness on mercury sources, releases, emissions and impacts. Ultimately, human health and the environment is protected by a reduction in anthropogenic releases and emissions of mercury and mercury compounds.
- 53. The diagram below shows the outputs (green boxes) leading to the project outcomes (purple boxes) ultimately leading to the impact (violet). The assumptions made at the design stage (Labelled A boxes in red) are also identified and linked to the relevant output. These assumptions are essential for the likelihood of realization of the intended outcome and impacts, and the most general and overarching assumptions are not linked to individual outputs, but rather to the intermediate state.

#### Figure 1: Theory of Change (re-constructed)

A: Economic resources will be available to carry out all the

project activities



## **V. Review Findings**

54. This chapter will answer the questions raised in the review terms of reference; as well as those raised in the evaluation criteria matrix presented in the inception report for consistency. It will present factual findings and evidence, and will analyze and interpret them whenever possible, then will provide a rating for each review criterion.

#### A. Strategic Relevance

#### UNEP's Mandate and Programme of Work

55. The project was very much aligned with UNEP's Medium-Term Strategy, and Programme of Work (POW) 2014-17 under the Chemicals and Waste Subprogramme. The Sierra Leone MIA and NAP contributes to UNEP's expected accomplishment of sound management of chemicals and waste. "Work under the sub-programme will aim to achieve the entry into force and implementation of the Minamata Convention on Mercury". In line with the strategy, the project increases the capacity of Sierra Leone to manage chemicals and waste and increases collaboration with the secretariats of chemicals and waste-related multilateral environmental agreements. The institutional and regulatory framework strengthening also falls under the same strategy, making the project very relevant and in line with UNEP's mandate.

#### The GEF Strategic Objectives

56. The project was also under GEF strategic priority and focal area on chemicals and waste. Mercury is a priority chemical under the chemicals and waste focal area strategy under both GEF V and GEF VI : under GEF V, it is addressed as a part of the Strategic Objective 3 Pilot Sound Chemicals Management and Mercury reduction, which has as an outcome 3.1 to build country capacity to effectively manage mercury in priority sectors; while under GEF VI, it is addressed as a part of the Chemicals and Waste Focal Area Strategy, CW1, program 2: Support enabling activities and promote their integration into national budgets, planning processes, national and sector policies and actions and global monitoring. It details the funding mechanism, also identified by the MC under Article 13. The outcomes of the project are crosscutting and contribute to fulfilling other CW objectives under GEF VI. and to the GEF Overall, the project is an initial and essential step towards early implementation of the Minamata Convention. Its outcomes contribute towards the sustainable development goals. The baseline information in various areas will be useful for the design of databased environmental policies, but also social, economic and developmental policies and strategies to be developed.

#### National and Regional Priorities

57. The project was very much aligned with Sierra Leone's UN Development Assistance Framework (UNDAF) pillars 2 (Managing Natural Resources) and 5 (Labour and Employment) highlighting equal labour opportunities for women and men. As a signatory and Party to most Chemicals and Waste Conventions, Sierra Leone has the political will to assess the extent and magnitude of its problem on mercury especially in the ASGM sector. The project is also linked to its existing chemicals and waste legislations namely: Establishment of Sierra Leone Chemicals Control and

Management Department, Environmental Impact Assessments on mining, the Fishery Products Regulations, Public Health Ordinance, Forestry Act, and the Chemicals and Pesticides Law. National Environmental Policy (1990), the National Environment Protection Act (2000), the Environmental Protection Agency Sierra Leone Act (2008, amended in 2010), the Mines and Mineral Act (2009) and the National Health Policy (March 2012). Stakeholder participation was robust where all relevant government agencies, civil society and mining communities were engaged. This facilitated a sense of national ownership and the stakeholders with very active national coordinators (MIA and NAP) were all motivated and driven to deliver the outcomes. During project execution, a complementary review and update of the Stockholm Convention national implementation plan also took place which facilitated the MIA.

58. The project is therefore highly relevant to global, regional, and national priorities. It very much aligns with UNEPs' Medium-term strategy and programme of work (2014-2017) expected accomplishments and the GEF's strategy on chemicals and waste, and to the national priorities of Sierra Leone.

#### Rating for strategic relevance: Highly satisfactory.

#### B. Quality of Project Design

- 59. As per the inception report: The project design is satisfactory overall. It takes into consideration the current state of environmental frameworks, legal framework, institutional capacity and national priorities. Sierra Leone Environment Protection Agency (EPA-SL) has initiated awareness raising on mercury and its impacts on health and environment; as well as impacts of the use of mercury in ASGM, recognized as an illegal activity. Estimates of mercury consumption in ASGM and emissions as well as a 2010 mercury inventory were available. The project was designed to build on these pre-existing efforts and to strengthen any efforts related to the sound management of chemicals in waste.
- 60. The aim of the project is to collect data on the level of mercury pollution present in different environmental sector in Sierra Leone in order to identify the priority issues and gaps in knowledge that need to be filled for the implementation of the Minamata Convention, while building on and strengthening any already existing chemicals management mechanism, structure or communication network. To accomplish this objective, a resilient and well-thought project design to trigger change that will affect how Sierra Leone manages chemicals, in particular mercury and its waste.
- 61. The strengths of the design include the strategic relevance, stakeholder analysis, the governance and supervision arrangements, and the risk identification and social safeguards. The strategic relevance places the project in the context of UNEP's mandate and GEF's priorities. The governance and supervision arrangements clearly identify how the project is to be executed and monitored, sharing and defining stakeholder roles and responsibilities, to encourage sound implementation. The financial planning is sound and does not display any deficiencies, and the funding is budgeted coherently for the timeline and outputs of the project. The financial mechanisms of the project at the design stage are well prepared, reasonable and transparent, contributing to its sustainability and overall success. Moreover, the project has a clear Theory of Change presented in diagram and narrative form.
- 62. The shortcoming of the project design is the superficial way in which it addresses the gender and

socio-economic aspects. There is no strategy to integrate gender, in the MIA beyond the mention of the need to include and represent women in the National Coordination Committees. There is no mention of differentiated roles and power relations socially assigned to men and women, and the role of women as a major stakeholder group not mentioned. Gender was however mentioned in the ASGM NAP. This was validated upon interview with project staff from the EA and IA who revealed that the gender and socio-economic component was not a focus of the MIA projects at the design stage. However, as the project evolves nationally and regionally, and as the priorities and focus of work of both UNEP and the GEF agency evolve into more sustainable development-oriented and comprehensive approaches, the integration of the gender paradigm and the collection of socioeconomic data in mercury management should be encouraged.

63. According to the gender rating scale in "Evaluation on Gender Mainstreaming in the GEF", by the Independent Evaluation Office of the GEF, this project can be qualified as 1 = gender partially mainstreamed: Gender is not reflected in the context, implementation of the MIA. However, gender (role of women) and socio-economic dimensions (poverty alleviation) are however highlighted in the ASGM NAP.

#### Rating for project design : Satisfactory

#### C. Nature of External Context

- 64. In terms of consideration for external factors that might affect the project, there was no mention of likelihood of conflict, which could be due to the relative political stability of Sierra Leone at the time of project preparation. Due to the short timeframe and nature of the project, it is understandable that the likelihood of natural disasters would not be detailed. The political situation of Sierra Leone was not described in the project document (ProDoc), perhaps because the project's outputs would include an assessment of its political and institutional framework. No risk assessment was done in the ProDoc, hence the risk of political change could not be predicted. However, the ProDoc indicated high level commitment from government institutions so the risk was low. In addition, in the process and based on project progress reports, there was a change of government/reorganization (project national consultants were appointed as ministers and executive chairs of the government) in Sierra Leone, which led to the delay in project delivery. The project was however completed despite the change in government.
- 65. The ProDoc however highlighted the socioeconomic benefits such as the benefits of the project on the poor in Sierra Leone ASGM communities. The project design also describeed how vulnerable and at-risk populations in Sierra Leone could be identified, citing poor populations living near gold mines and non-ferrous metal production plants; as well as workers in those sectors who are considered particularly vulnerable and at risk of contamination. The necessity to sensitize these populations was stressed, but at the design stage, there was no mention of the manner in which this is to be carried out. This is not necessarily a lack of planning but rather allows for flexibility and gives the national coordination committee the opportunity to find the best and most appropriate way to raise awareness on the issue, factoring in the national context.
- 66. The project document considered gender especially the socio-economic role of women in ASGM activities and the biological risk to women especially during pregnancy. The project specified opportunities for women participation in national coordinating committees especially in the NAP, and data collected would be disaggregated by sex.

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

#### D. Effectiveness

#### Achievement of outputs

67. The core outputs of the project consist of the following:

1) an assessment of national infrastructure and capacity for the management of mercury, and ASGM, including national legislation; 2) a mercury inventory of emissions and releases, developed using the UNEP toolkit; 3) strategies to identify and assess mercury contaminated sites including ASGM sites; 4) a national MIA report, an optional implementation plan, and awareness-raising and result-dissemination materials and an ASGM NAP; 5) the creation of a National Coordination Mechanism Committee to oversee and manage the execution of the above outputs and a mechanism permitting information exchange, capacity building and knowledge generation for mercury management on a national and regional level. Review of the project documentation, the deliverables and consultation with the available stakeholders confirmed that the outputs delivered are of sufficient quality and would be useful to stakeholders overall.

## Assessment of national infrastructure capacity for management of mercury, including ASGM

- 68. The national capacity and infrastructure assessment were submitted as part of chapter IV of the MIA report, completed in March 2020 and produced by the co-executing agencies UNITAR and the Sierra Leone Environment Protection Agency. The quality of the report is satisfactory. It has an extensive analysis of government structures (Environment, Mining, Health and Sanitation, Education, Labor, Trade, Customs). Sierra Leone has a devolved government structure and local councils have authority. Chapter IV also details the stakeholders, such as academe, non-governmental institutions, private sector stakeholders or other concerned parties. The description of the existing governmental infrastructure is highly satisfactory and important to understand the legislative and socio-economic governance. The assessment of legislation in Chapter IV of the MIA is also satisfactory , as it utilized the <u>NRDC checklist</u> as per the <u>IOMC MIA guidelines</u>. The legislative process is also described. In both MIA and NAP, Sierra Leone's commitment to support global action in protecting human health is evidenced by being a Party to several environmental and Chemicals and Waste multilateral environmental agreements.
- 69. Chapter I of the MIA describes Sierra Leone's natural mineral resources and a profile of solid mineral deposits particularly gold and diamonds, highlighting the importance of the ASGM sector. In Chapter I of the NAP, the ASGM sector is articulated in Vision 2035, where Sierra Leone aspires to become an inclusive, green, middle-income country by 2035. ASGM is also a part of Sierra Leone's *Medium-term National Development Plan* (MTNDP) 2019-2023, Vision 2035, UN Agenda 2030 and AU Agenda 2063.
- 70. The project document includes how the project could contribute to its UN Development Assistance Framework (UNDAF) pillars 2 (Managing Natural Resources) and 5 (Labor and Employment) highlighting equal labor opportunities for women and men. In the MIA, key legislations and policies that are relevant to the project are highlighted: Establishment of Sierra Leone Chemicals Control and Management Department, Environmental Impact Assessments on mining, the Fishery Products Regulations, Public Health Ordinance, Forestry Act, and the Chemicals and Pesticides Law.

71. Despite the political will in aligning mercury and ASGM to its national development goals, Sierra Leone needs to enhance assessments and its technical capacities to implement the Minamata Convention and would therefore need to develop more comprehensive chemicals/mercury assessment and management capacities and a National Action Plan on ASGM to comply with article 07.

#### Mercury inventory using the UNEP Toolkit

72. Sierra Leone delivered its inventory of mercury sources of inputs, emissions and release using levels 1 and 2 of the UNEP inventory toolkit. The inventory is complete, and its quality was reviewed by an expert who has contributed (to a significant extent) to the development of the toolkit. This output has been evaluated independently and therefore its completion and timely delivery are the only factors that can be rated by the evaluator for this terminal review.

#### Assessment of contaminated sites

73. The inventory results indicate no contaminated sites in Sierra Leone. The NAP however reveals the contaminated sites due to ASGM activities with a map of these sites provided. The National Action Plan (NAP) for ASGM will prioritize the development of strategies and guidelines for the identification and assessment of contaminated sites in the country.

#### Minamata Initial Assessment report

- 74. The report was one core deliverable, submitted by Sierra Leone EPA and UNITAR in March 2020. It has the two outputs described above (inventory and assessment of legislative framework), as well as a chapter on identifying populations at risk and the gender dimension (although the same as in the ASGM NAP), and a chapter on awareness raising and existing training and education opportunities of target groups and professionals, according to the IOMC MIA guidelines.
- 75. *Implementation plan*: The implementation plan is not an MIA requirement, but it is considered good practice, and further demonstrates ownership and the country's engagement in the early implementation process. Sierra Leone's MIA has a Chapter on its implementation plan that includes its priority areas of action with concrete timelines, deliverables and resource requirements. The MIA also describes mainstreaming mercury in the national priorities of Sierra Leone.

#### ASGM National Action Plan

76. The ASGM NAP is the other core deliverable in this project which is also satisfactory. It has the relevant chapters on ASGM overview, vision, goal and objectives, and an implementation strategy including ASGM formalization, as well as a concrete workplan. This output has been evaluated independently through a peer review process and therefore its completion and timely delivery are the only factors that can be rated by the evaluator for this terminal review.

#### Awareness raising materials

77. Chapter 5 of the MIA outlines awareness raising activities in Sierra Leone that includes 3 (inception plus 2 other workshops) for government officials, civil society, and the private sector. It has identified its communication strategy including public education and information

#### dissemination through various media such as radio and TV.

#### National coordination mechanism committee

78. Sierra Leone created a multi-stakeholder committee, including a majority of government agencies and relevant industry, NGO and civil society partners. A list of committee members (Ministries, Departments, Agencies), academe and NGOs is included in Annex B. Interviews revealed that the government agency representatives outweigh the civil society and private sector stakeholders in number. The inability to travel and the information available to the evaluator is not sufficient to judge if more could have been done by the country to involve civil society and the private sector. However, stakeholder interviews and outcomes from the on-line survey confirm that overall the committee served its purpose and provided sufficient participation.

#### Stakeholder Involvement

79. Due to travel limitations and the challenges in reaching all stakeholders in Sierra Leone, only a small number of stakeholders has been interviewed through telephone/whatsApp calls and an on-line survey. The evaluator developed a questionnaire online to simplify the feedback process and validated outcomes of the interviews. The majority of the stakeholders contacted are key players in the execution of the project and have all participated actively in the production and review of the deliverables. Overall, all respondents felt sufficiently involved in the preparation and implementation.

#### Achievement of Outcomes

80. All the outputs stated above contributed to the achievement of outcomes. As per the ToC reconstructed for the purpose of this evaluation, there is one impact pathway for the scale of this project. Impact pathway 1 - Data Collection and Establishment of Baseline Institutional Framework: From outcomes 1, 2, 3,4,5, and 6 to project objective. The fulfilment of the project objective requires the success of all six main outcomes, and each outcome is linked to the next in a causal/continuous sequential logic: In order for the country to be able to ratify the Minamata Convention and comply with article 7 on ASGM, it must first assess and enhance its existing information and capacities on ASGM (Outcome1), then it must have a complete understanding and baseline assessment of its institutional, regulatory/legal and mercury management capacities for MIA (Outcome2), as well as a full understanding of its mercury capacities in order to draft its MIA and NAP (Outcome 3). These three outcomes provide the first stages and baseline information in order to begin collecting quantitative and qualitative data using the UNEP Mercury Inventory Toolkit levels 1 and 2 and ASGM sector leading to enhanced understanding of mercury releases and emissions (Outcome 4), and in turn, the information provided by the Inventory leads to an improved understanding of the national priorities and the institutional and regulatory gaps, and an improved understanding of national needs and gaps in mercury management and monitoring that would enable a better identification of future activities (Outcome 5). Consequently, at this stage, the project has reached the intermediate state (referred to as Outcome 6 in the project document) at which all relevant stakeholders have the necessary information through the MIA and NAP report so as to take targeted action in filling the gaps in legislation and institutional capacity, while continuously working together to reduce and stop mercury releases to the environment, and address all issues that arose during the undertaking of the inventory. All of the above consequently leads to the implementation of the Minamata Convention and compliance with article 07 on ASGM, which directly supports the project's global environmental benefits of reduced mercury emissions and releases and decrease in mercury related diseases and environmental degradation. A key assumption is that key stakeholders are willing to ratify the Minamata Convention. An important driver is the heightened awareness on mercury sources, releases, emissions and impacts. Ultimately, human health and the environment is protected by a reduction of anthropogenic releases and emissions of mercury and mercury compounds.

- 81. Achievement of outcomes could be attributed directly to the project which is "enabling" in nature, to the good quality of project management and supervision, stakeholders' participation, communication and public awareness. While not highlighted in the MIA, responsiveness to human rights and gender equity was highlighted in the ASGM NAP.
- 82. It can be concluded that the project has fulfilled both outputs and outcomes and is therefore at the intermediate stage. While Sierra Leone ratified the Minamata Convention even before the project concluded, the project will help in the actual implementation of the Convention and its ASGM NAP will serve as the roadmap towards complying with Article 07 (ASGM) of the Convention.

#### Likelihood of Impact

- 83. The positive results of this project are as follows: Knowledge of the baseline situation in relation to mercury presence in the environment and mercury management strategies in the country; awareness raising among stakeholders and policymakers about the mercury and ASGM situation ; elaboration and dissemination of an action plan towards the implementation of the Minamata Convention and elaboration of an ASGM NAP. All of these impacts are a direct result of the project outcomes discussed and highlighted in Figure 1 and in the above section. Without undertaking these baseline studies, it is unlikely that international support for work on the Minamata Convention would be forthcoming. All of these are a direct result of the project outcomes, Sierra Leone will be able to implement the Minamata Convention and comply with article 7 (ASGM). Overall, the project will likely deliver a positive impact of protecting human health and the environment from the anthropogenic effects of mercury
- 84. One unintended positive result was observed by the executing agency: coordination across tasks teams of the National Coordination Committees has created more awareness on the subject of mercury, and chemicals management in general, among many ministries that would not necessarily have been sensitized to the issue. Also, raising awareness on the interlinkages between production, imports, the waste management and the chemicals management sector among various ministries can also be an unintentional positive impact. Furthermore, as some consultants engaged in the project have taken on ministerial and senior positions in various government agencies, there is a unique level of understanding of the MIA and NAP processes spreads across the SL Government. While this is an unintended consequence, it is to the credit of the project teams that such highly regarded professionals were engaged in the project. No unintended negative impacts have been observed by the evaluator or by the stakeholders consulted.
- 85. In terms of catalysed change, and because of the nature and scale of the project, it is not expected that it will produce any behavioural changes yet. It is expected that stakeholders will utilise all the data gathered in this project when implementing the implementation plan elaborated in the MIA and NAP reports. In terms of institutional change, the National Coordination Mechanism is

strengthened through the various meetings, workshops and training opportunities. Stakeholders have confirmed that the networks, task teams and structures established during the implementation of the project will remain in place and become the basis for further action. The mechanism seems robust enough to continue working towards the long-term impact of eliminating mercury emissions and releases in the country. As for replication, the project design is conducive to replication. Ideally, the design would be adjusted and adapted to the national situation of the country; however, given the "enabling" nature of the project, it is only after the completion of the project and with enough data gathered that the country background could be obtained.

86. One aspect to be considered in replication would be to identify the gender and sex disaggregated data and/or socio- economic analysis as a specific component of the MIA project. Gender considerations are however highlighted in the ASGM NAP.

Attainment of Objectives and Planned Results

87. The project findings and deliverables, in the form of the full MIA report and ASGM NAP and its executive summary, along with awareness raising materials, were made available to all relevant non-governmental counterparts in Sierra Leone. The project planned for a validation workshop but the coronavirus pandemic that also affected Sierra Leone prohibited public gatherings and meetings and thus was unable to obtain direct feedback from stakeholders.

#### Compliance of Assumptions:

- 88. The Logical Framework of the project states that the following assumptions were made at the design stage:
- 89. "The project will make full use of existing resources nationally, regionally and globally. Regional joint activities, trainings and continuous exchange of information will take place during the regional meetings and/or lessons learned workshops through the mercury platform. Identification of common areas of work and synergies with undergoing or planned activities at the national and international level will be continuously assessed during the project;" According to project documentation and stakeholder feedback, this assumption holds.
- 90. "The project will continue having the political and public support necessary for its implementation" According to project documentation, the participating countries' increased sense of ownership and the full engagement of stakeholders apparent from interviews and feedback provided to this evaluation, this assumption holds. In addition, project national consultants were appointed to high political positions, serving as Ministers and Executive Chairs in government, thus ensuring political and public support.
- 91. "National Stakeholders will facilitate and contribute to the assessment of national infrastructure, capacities and legislation" According to feedback from project management and all relevant stakeholders, this assumption holds as the participation levels of national stakeholders remains constant and engaged. Currently, national stakeholders have continued to communicate on national chemicals management via a WhatsApp group.
- 92. "National stakeholders will facilitate and contribute to the identification and quantification of *mercury releases;*" As the MIA and NAP reports are finalized, this assumption holds.

- 93. "Qualified staff and experts to carry out the project activities will be identified and retained" All local consultants were competent, and the national coordination mechanism is composed of competent individuals, therefore this assumption holds.
- 94. "Economic resources will be available to carry out all the project activities" Financing from the GEF and in-kind co-financing from the government was made available for the project, and the activities were carried out, therefore this assumption holds. Although the delivery and disbursement of funds was not always timely.
- 95. "Key stakeholders will make full use of the MIA related assessments to ratify and implement the Minamata convention". While Sierra Leone ratified the Minamata Convention early in the project, the project outputs in particular the MIA and ASGM NAP will facilitate implementation of the Convention.

#### Rating for effectiveness: Satisfactory

#### E. Efficiency

- 96. The project was able to achieve its projected outputs without any political or social challenges, despite the change in government or reorganization during project. It utilized and strengthened already existing chemicals management networks in various ministries, such as the National Implementation Plan (NIP) structures for the Stockholm Convention and produced baseline data reports where they were none.
- 97. There were significant delays in project delivery, mainly due to administrative delays, but the execution team was supportive, responsive and receptive to feedback. The administrative delays were essentially delays in payment from the IA to the EA which in turn were due to delays in reporting from the EA to IA and thus reduced efficiency. The delays were also due to lack of human resources and their capacities on the ground, which required training from the executing agency who then provided consultants to train local Sierra Leone personnel. The delays unfortunately led to the non-organization of the validation workshop, as these were planned at a time when the coronavirus pandemic occurred.
- 98. These delays could have been avoided with different preparation, by greater communication of training needs of local counterparts and timely reporting. The project was cost effective. Training local consultants was more cost effective than hiring international consultants. The project extension had no considerable impact on project efficiency or delivery.

#### Rating for efficiency: Satisfactory.

#### F. Financial Management

99. The project has very good utilization rate: 685,000 USD out of the 700,000 USD budget total, or 98 % of its total budget. The remaining 15,000n USD will be used for the terminal evaluation fees. The

final financial report is attached as Annex B.

- 100. The complete and regular bi-annual financial reports provide sufficient detail into how well the executing agency managed funds. There was constant communication between the financial and project management staff.
- 101. There are no financial irregularities to be reported on based on project documentation. Stakeholder feedback did not raise any issues relating to financial irregularities.

#### Rating for financial management: Satisfactory.

#### G. Monitoring and Reporting

- 102. The monitoring and reporting mechanism consisted of bi-annual progress reports submitted by UNITAR to the UNEP task manager, who provided regular feedback on these reports. This was carried out via email, Skype, or during UNEP staff missions to the meetings where the government representatives were also present. Feedback highlighted the excellent relationship between the EA (UNITAR) and its co-executing agency (EPA Sierra Leone) and the relevant Ministries and stakeholders.
- 103. All progress and financial reports to date are detailed, complete and accurate in relation to the project targets and indicators. The monitoring design and budgeting by the Task Manager is sufficient for this project. Monitoring implementation and project reporting was done by the Task Manager.

#### Rating for monitoring and reporting: Satisfactory.

#### H. Sustainability

- 104. In relation to the assumptions made at the design stage, and as per the nature of the project which is enabling there are no social factors that have influenced the project progress toward its intended impacts Despite the reorganization in the EPA Sierra Leone during the project, it has political stability and the will to implement its MIA implementation plan and priorities as well as its ASGM NAP. Any type of political instability can effectively influence and threaten progress on the road to implementation. However, the feedback provided for the evaluation reflects a satisfactory level of country ownership to allow for the next steps to be sustained. It must be noted that this is more a reflection on the country's efforts to fully implement the Minamata Convention, which will be a lengthy process, but it is not the subject of this evaluation. This project has achieved its direct outcome, which is paving the way for other projects and activities to be undertaken in the field of mercury management, especially on ASGM.
- 105. It was challenging for the evaluator to contact all tertiary stakeholders, such as academic institutions and NGOs due to time constraints and lack of response from those contacted. However, all national co-executing partners interviewed have agreed that their relationship with the executing agency, UNITAR, was instrumental to project completion. UNITAR has a roster of experts whom it can deploy to countries and train on the inventories and has internal capacity to review MIA and NAP reports and deliver quality results.

- 106. The implementation of the MIA plan and action in carrying out the priority activities will depend on National Coordination Mechanism Committee and its multiple stakeholders. It will also depend on the engagement of the national project teams in continuing to take the lead and introducing the appropriate policies, regulations and decisions, informed by the MIA project results. Sierra Leone has sustained its multi-stakeholder group on mercury by creating a WhatsApp group for regular communication.
- 107. The involvement of intergovernmental organizations is important for the sustainability of the project and of the implementation of the Convention. Sierra Leone will need useful recommendations (experts, international consultants, examples of successful projects to model upon in the region, etc.) from experienced partners for sustainability in the future.
- 108. Sierra Leone is requesting a huge amount to fund its MIA implementation plan and ASGM NAP. The country needs to find new ways of an integrated approach of financing such as by engaging the private sector.

#### Rating for sustainability: Moderately likely.

*I. Factors and processes affecting project performance* 

#### Preparation and readiness

109. The project experienced delays due to lack of capacities on the ground to conduct the inventories. The EA (UNITAR) was responsive by deploying experts to train local personnel. Another cause of delay was the late reporting that led to delays in fund release from IA to EA. The project was extended though at no cost in January 2019 in order to complete activities and related reporting. It was managed efficiently and effectively, with reported regular communication between UNITAR and UNEP. The national co-executing partner provided positive feedback about the quality and quantity of communication.

#### Rating for project implementation and management: Satisfactory.

#### Stakeholder participation, cooperation and partnerships

- 110. The degree of effectiveness of collaboration between stakeholders is satisfactory drawing on a very robust stakeholder analysis from the start of the project. However, more could have been done to involve the private sector and gender-specialized organizations or associations. While gender considerations and the role of women were highlighted in the ASGM NAP, more of gender should be highlighted in the MIA.
- 111. Most stakeholders felt like they were not sufficiently involved in the design stage of the project, while all felt like they had an active role in its implementation, particularly in the committee meetings and its decision-making process. Stakeholders have reported feeling satisfied at the level of collaboration.

#### Rating for stakeholder participation, cooperation and partnerships: Satisfactory.

Responsiveness to human rights and gender equity

112. A human rights-based approach and gender equity were highlighted in the ASGM NAP. The role of women was mentioned in the MIA (national coordinating committee), however the MIA did not provide sex-disaggregated data.

#### Country ownership and driven-ness

113. Sierra Leone displays a sufficient level of country ownership, however, it may not be able to deliver on its MIA implementation plan and ASGM NAP without the proper financing mechanism and support of international organizations. Sierra Leone would also benefit from sharing of data and experiences in the subregion to obtain information on financial sustainability

#### Rating for country ownership and driven-ness: Moderately satisfactory.

#### Communication and public awareness

- 114. Sierra Leone developed a communication strategy and awareness materials but was not available at the time of review. Materials developed under the ASGM NAP are satisfactory. Awareness raising and public awareness are continuous efforts that should be underlying all upcoming projects relating to the Minamata Convention.
- 115. A WhatsApp group was established in the project and is sustained until this evaluation, and this communication network would be valuable in awareness raising and the over-all the MIA implementation and ASGM NAP.

#### Rating for communication and public awareness: Satisfactory.

#### Rating for factors affecting performance: Satisfactory.

## VI. Conclusions, Lessons Learned and Recommendations

## i. Conclusions

116. Without the MIA project, it would be challenging for Sierra Leone to implement the Minamata Convention. Although it ratified the Convention early on in the project, the data, inventories and information on mercury and its compounds are very useful for the country to implement and comply with its obligations under the Convention. The ASGM NAP is useful as the country's roadmap to comply with article 7 (ASGM). With the MIA and NAP, Sierra Leone is enabled to collect data on the quantity of mercury in each of its environment media (air, water, land) and to quantify the amounts of mercury containing products imported illegally, and disposed of informally, by different sectors and industries (medical devices, batteries, dental amalgam, ASGM) in order to devise appropriate action plans and to identify tailored priorities on the road towards implementation. Using the necessary scientific and technical knowledge and tools, the project delivered complete MIA and ASGM NAP implementation plans that allow mercury to be mainstreamed in the country's priorities. While the conduct of the final validation workshop was hampered by the coronavirus pandemic, the MIA and NAP and awareness materials were disseminated at the national level. The MIA and NAP

underwent sufficient electronic review by national stakeholders and national as well as global technical experts in a cost-effective manner.

- 117. The project design was satisfactory, linking the project to UNEP's Medium-Term Strategy and Programme of Work, as well as to GEF 5 Strategic Priorities. Relevance to national priorities and needs was highlighted especially in the ASGM sector. It highlighted the links to Sierra Leone's UN Development Assistance Framework (UNDAF) and legislative framework especially on chemicals and waste.
- 118. The project had administrative delays and project extension was requested. Despite delays in project execution, project outputs and outcomes as well as intermediate state was achieved (delivery of the MIA and ASGM NAP).
- 119. As for the mercury inventory in the MIA and NAP, regular communication of needs for more training that were still necessary could facilitate delivery of the inventories. Delay in project execution could be attributed to the need to train local experts on the inventory toolkit. Challenges in obtaining reliable data on energy consumption, products and waste from the relevant Ministries likewise caused delays in project execution. A project revision was done in terms of extending the project timeline to allow more time to conduct national consultations/validation and for the EA to finalize the reports on challenges and opportunities as well as in drafting the final MIA and NAP. A more realistic timeframe would benefit future projects.
- 120. The project ensured sustainability by training national focal points and representatives from academe on how to do mercury inventories. While socio-political and institutional sustainability is likely, financial sustainability after project completion would be moderately unlikely. There is a need for a regional framework to ensure the project's sustainability by encouraging countries in the subregion (West Africa) to share data, experiences, and information. The next step is to work and collaborate more subregionally, by sharing of data, experiences, information of financial and ensure financial sustainability.
- 121. The project's **strengths** have been the smooth collaboration among the government agencies and stakeholders (especially the mining community) in Sierra Leone that delivered on the outputs in both MIA and NAP. There was also regular communication between the executing agency (UNITAR) and the co-executing partner (Sierra Leone Environment Protection Agency) as well as with the implementing agency (UNEP) addressing issues and concerns during implementation. The selection of the appropriate project national coordinators for the MIA and NAP, both from the national government and academe was also considered a strength of the project.
- 122. This close working relationship among stakeholders in Sierra Leone is currently sustained by a "National Chemicals Forum" that includes government agencies, local government authorities, civil society, academe, local mining communities. This group currently communicates regularly via WhatsApp and other forms of communication. The stakeholder analysis at the design phase was thorough and is highly satisfactory, as it was carried out in consultation with the national government and included the interests/influences and potential roles of relevant stakeholders. The robust stakeholder analysis in the design phase facilitated the engagement in project execution.
- 123. In terms of the process and quality of delivering the MIA and NAP, the project benefitted by a series of reviews by both the EA and the IA "peer reviewers". Furthermore, the GEF ASGM global component also provided valuable review input into the final products.

- 124. The project's **weaknesses** have been mainly the poor time management and delays in reporting and delivery that resulted in delays of fund release from IA to EA. There was also delay in identifying technical experts for the mercury inventory that also required training of the local experts, further contributing to the delay. While the gender and socio-economic dimensions and links to poverty alleviation were highlighted in the project document, there was no emphasis on gender and socioeconomic dimensions in the MIA. Nevertheless, gender considerations were highlighted in the ASGM NAP. While mention was made of the vulnerable populations at risk (women, youth, and children) in the ASGM NAP, no mention was made on the links to human rights or effects on indigenous peoples. This is an area that needs to be highlighted in ASGM NAPs.
- 125. Overall, this enabling project was able to deliver on the outputs and outcomes as well as the intermediate state (MIA and ASGM NAP), with the support of the able executing agencies and the implementing agency Task Manager.

#### 126. ii. Lessons Learned

**Lesson 1:** Engaging the EA and national EA as well as key stakeholders at the project design stage will ensure better understanding of the project outputs and outcome. These pre-contract meetings/information sharing could facilitate a sense of ownership and enable addressing country specific needs for project execution. This is important since the government of Sierra Leone (Environment Protection Agency) was a co-executing partner and its needs, such as capacities to carry out mercury inventories, could have been expressed upfront. The project was designed by the IA as a standard "enabling" project but would have benefited from consultation or pre-implementation meetings with the EA and national co-executing partners to address country - specific needs such as having a realistic project timeframe given the political instability and armed conflict in the DRC. The Executing Agency must hold pre-implementation information/expectation setting sessions with the country. It is important to engage the EA and stakeholders in the project design stage to have a sense of ownership of the project upfront.

**Lesson 2:** Specifying activity and monitoring timelines in contracts/agreements between the IA and EA and with the partner executing agency (national EA) will avoid project extensions and ensure timely delivery of outputs. Conduct of simultaneous activities could be considered. This will avoid project extensions and ensure timely delivery of outputs.

**Lesson 3:** Gender dimensions of chemicals/mercury should be included in the assessment. While the gender and the role of women was highlighted in the MIA and ASGM NAP, there was no emphasis on gender ( such as the role of women and the need for data disaggregated by sex) data in the MIA. The ASGM NAP also needs to highlight links to human rights and impact on indigenous population.

**Lesson 4:** The EA needs to prioritize identification of relevant country partners to be trained and do country-based work on the inventory. Delays in the mercury inventory could be attributed to delays in identifying and training country partners on how to do mercury inventory. Delays were also due to challenges in obtaining meaningful and reliable data such as on energy consumption, products and waste from the relevant Ministries. Data is imperative to make meaningful and informed decisions on chemicals and waste management in general, and on mercury management in particular.

**Lesson 5**: Unforeseen events such as the change in government further contributed to delay in project execution. The project would have benefitted from a more realistic timeframe.

**Lesson 6**: Constant and regular communication between the project IA and EA addressing issues and concerns throughout execution contributes to the positive delivery of outputs. The smooth collaboration among the government agencies and stakeholders (especially the mining community) in Sierra Leone delivered on the outputs in both MIA and NAP. The selection of the appropriate project national coordinators for the MIA and NAP, both from the national government and academe also contributed to output delivery.

**Lesson 7**: Project sustainability could be ensured by having socio-political and institutional sustainability such as in the case of Sierra Leone. Training of local staff in doing the technical inventories enables sustainability

**Lesson 8**: Project sustainability could be insured by having socio-political and institutional sustainability such as in the case of Sierra Leone. Training of local staff in doing the technical inventories enables sustainability. However, financing sustainability to implement its plan may be moderately unlikely. Sierra Leone and countries in the subregion (West Africa) should be encouraged to share data, experiences, and lessons learned that could be source of information for financing sustainability.

### 127. Recommendations

Taking into account the scope of the evaluation and based on the main findings, conclusions and lessons learned, the recommendations that follow are addressed to UNEP as Implementing Agency, UNITAR as executing agency, and to national coordinators to help in the implementation and execution of future projects of similar nature, i,e, "enabling projects" dealing with initial assessments and drafting of national action plans, as well as for countries with a similar socio-economic- political background.

#### At the design or pre-implementation phase of the project

**Recommendation 1 for the IA and EA:** The EA and its executing partner (in this case the national government) needs to be in contact even before the start of project activities in order to share expectations and express needs such as on building technical capacities of country partners. The EA, its executing partner and stakeholders need to be engaged in the project design stage to have a sense of ownership of the project upfront.

**Recommendation 2 for the IA EA, and national project coordinators**: In contracts and agreements, the activity and reporting timelines which has implications in fund release must be clearly specified. Simultaneous activities by task teams that contribute to efficiency could be considered. Timely reporting from project coordinators to the EA and consequently to the IA will enable immediate fund release. This will avoid project extensions and ensure timely delivery of projects.

**Recommendation 3 for IA and EA**: Gender, socio-economic (indigenous population) and legal (human rights) experts must be engaged early on in the MIA and NAP. Costing for such experts must be included in project budget.

**Recommendation 4 for IA and EA**: A more realistic timeframe will benefit the project. This will allow time for the EA to identify local partners to be trained on conducting inventories, as well as for co-executing partners to obtain more meaningful data from relevant Ministries. Emphasize the need for meaningful data at the inter-agency meetings while engaging the relevant Ministries and sectors Consider engaging the private sector and academe who could also facilitate in obtaining relevant data for chemicals/mercury management. Similarly, the design of MIAs should allow for more specific data gathering activities.

#### During the implementation phase of the project,

**Recommendation 5 for the EA and national project coordinators:** Unforeseen events such as the sudden change in government should be factored in the project timeframe.

**Recommendation 6 for the EA**: Constant and regular communication between the EA and the national stakeholders should be maintained throughout the project to ensure that technical needs and training are discussed and planned. This will ensure meeting deadlines, hence avoiding delays.

#### Post- project implementation:

**Recommendation 7 for the national project coordinators**: Countries in the subregion (West Africa) should be encouraged to share data, experiences, and lessons learned that could be source of information for financial sustainability. Funding for the national implementation plan is not part of this "enabling" project. Subregional collaboration and sharing of data an experience would be valuable and could be facilitated by UNEP and UNITAR which have both carried out similar projects in other countries in the sub-region.

#### Annex A: Assessment of Quality of Project Design Template

#### TEMPLATE FOR THE ASSESSMENT OF PROJECT DESIGN QUALITY (PDQ)

2. Key sources of information for completing this assessment include the approved project document (ProDoc), the Project Review Committee (PRC) review sheet, the project logical framework or Theory of Change (TOC) at design stage and, where appropriate, a revised project design following a Mid-Term Evaluation/Review. (For GEF projects the GEFSEC reviews sheet and UNEP response sheet should also be reviewed).

3. Unless otherwise marked, 'Section Rating'<sup>2</sup> refers to the question: *In the project design documents, how satisfactorily is the criteria addressed*? Satisfactoriness refers to both the completeness and quality of the content. The section ratings should be aggregated, using the weightings described below, to determine an overall rating for the Quality of Project Design. During the course of the evaluation the overall project design quality rating should be entered in the final evaluation ratings table under Item B. Quality of Project Design.

Α.	Nature of the External Context <sup>3</sup>		YES/NO	Comments/Implications for the evaluation designSection Rating (see footnotes 2 & 3) - Highly Unfavourab Highly Favourabledrivers, methods and approaches, key respondents etc)Highly Favourable	
1	Does the project document identify any unusually challenging operational factors that are likely to negatively affect project performance?	i)Ongoing/high likelihood of conflict?	No	There is no mention of likelihood of conflict. Sierra Leone is politically stable.	2
		ii)Ongoing/high likelihood of natural disaster?	No	There is no mention of likelihood of natural disasters, as it is unlikely they will affect the implementation of the project.	
		iii)Ongoing/high likelihood of change in national government?	No	There is no mention of likelihood of change in national government	
В.	Project Preparation		YES/NO	<b>Comments/Implications for the</b> <b>evaluation design</b> (e.g. questions, TOC assumptions and drivers, methods and approaches, key respondents etc)	Section Rating
2	Does the project document entail a clear and adequate problem analysis?		Yes	Yes, the ProDoc clearly states the need for a national assessement of mercury capacities (institutional and regulatory) to develop an MIA and NAP in Sierra Leone.	5

3	Does the project document entail a clear and adequate situation analysis?		Yes	Yes, the ProDoc presents an adequate situation analysis.	
4	Does the project document include a clear and adequate stakeholder analysis?		Yes	Yes, the ProDoc has a thorough stakeholder analysis.	
5	If yes to Q4: Does the project document provide a description of stakeholder consultation during project design process? (If yes, were any key groups overlooked: government, private sector, civil society and those who will potentially be negatively affected)		Yes	The stakeholder consultation process is well described.	
6	Does the project document identify concerns with respect to human rights, including in	i)Sustainable development in terms of integrated approach to human/natural systems	N/A	This project aims to gather data in order to have a baseline for presence of Hg, therefore it will not affect human/natural systems.	
	relation to differntiated gender needs and sustainable development?	ii)Gender	Yes	Yes, the project document specifies that opportunities for women will be present by ensuring that they are well represented in national coordinating committees.	
		iii)Indigenous peoples	Yes	This project engagement of indigenous peoples living in ASGM areas.	
С.	Strategic Relevance		YES/NO	<b>Comments/Implications for the</b> <b>evaluation design</b> (e.g. questions, TOC assumptions and drivers, methods and approaches, key respondents etc)	Section Rating

7	Is the project document clear in terms of its alignment and relevance	i) UNEP MTS and PoW	No	The project document needs to highlight its relevance to UNEP MTS and POW.	4
	το:	iii) UNEP/GEF/Donor strategic priorities (incl Bali Strategic Plan and South South Cooperation)	Yes	The project document mentions its alignment to the GEF priority area of chemicals and waste.	
		ii) Regional, sub-regional and national environmental priorities?	Yes	The project document provides an adequate and clear description of alignment and relevance to Sierra Leone's national priorities, current activities and UNDAF priorities.	
		iv) Complementarity with other interventions	Yes	Yes, there is mention of how this project complements other initiatives by UNEP/GEF in SL	
D.	Intended Results and C	Causality	YES/NO	Comments/Implications for the evaluation design (e.g. questions, TOC assumptions and drivers, methods and approaches, key respondents etc)	Section Rating
8	Is there a clearly presented Theory of Change?		Yes		5
9	Are the causal pathways from project outputs (goods and services) through outcomes (changes in stakeholder behaviour) towards impacts (long term, collective change of state) clearly and convincingly described in either the lograme or the TOC?		Yes		
10	Are impact drivers and assumptions clearly described for each key causal pathway?	-	Yes	There is only one main causal pathway; all descriptions are clear.	

11	Are the roles of key actors and stakeholders clearly described for each key causal pathway?		No	Not in the ToC but this is implied and clarified in a different section of the project document.	
12	Are the outcomes realistic with respect to the timeframe and scale of the intervention?		Yes	If there are no delays in delivery of all activities, the timeframe is realistic for undertaking the activities.	
Ε.	Logical Framework and	Monitoring	YES/NO	<b>Comments/Implications for the</b> <b>evaluation design</b> (e.g. questions, TOC assumptions and drivers, methods and approaches, key respondents etc)	Section Rating
13	Does the logical framework:	i)Capture the key elements of the Theory of Change/ intervention logic for the project?	Yes		5
		ii)Have 'SMART' indicators for outputs?	Yes		
		ii)Have 'SMART' indicators for outcomes?	Yes		
14	Is there baseline information in relation to key performance indicators?		Yes		
15	Has the desired level of achievement (targets) been specified for indicators of outputs and outcomes?		Yes		
16	Are the milestones in the monitoring plan appropriate and sufficient to track progress and foster management towards outputs and outcomes?		Yes	Yes, sufficient assuming there are no delays or errors. Perhaps accounting for errors and delays would be useful in the future.	
17	Have responsibilities for monitoring activities been		Yes		

	made clear?			
18	Has a budget been allocated for monitoring project progress?	Yes		
19	Is the workplan clear, adequate and realistic? (eg. Adequate time between capacity building and take up etc)	Yes	Timing realistic assuming all disbursements and no administrative delays occur.	
F.	Governance and Supervision Arrangements	YES/NO	Comments/Implications for the evaluation design (e.g. questions, TOC assumptions and drivers, methods and approaches, key respondents etc)	Section Rating
20	Is the project governance and supervision model comprehensive, clear and appropriate? (Steering Committee, partner consultations etc. )	Yes	Yes, the PSC's role and implementation arrangements/supervision is clear. The exact composition of the PSC is not in the project document but provided by UNEP TM.	5
21	Are roles and responsibilities within UNEP clearly defined?	Yes	As Implementing agency, UNEP is responsible for overall supervision, monitoring and evaluation, and overarching technical support and advice.	
G.	Partnerships	YES/NO	Comments/Implications for the evaluation design (e.g. questions, TOC assumptions and drivers, methods and approaches, key respondents etc)	Section Rating
22	Have the capacities of partners been adequately assessed?	Yes		5
23	Are the roles and responsibilities of external partners properly specified	Yes		

	and appropriate to their capacities?			
н.	Learning, Communication and Outreach	YES/NO	<b>Comments/Implications for the</b> <b>evaluation design</b> (e.g. questions, TOC assumptions and drivers, methods and approaches, key respondents etc)	Section Rating
24	Does the project have a clear and adequate knowledge management approach?	Yes	The project aims to collect data in order to establish a baseline for the presence of mercury in the environment as well as information on the ASGM sector. It relies on a toolkit provided and revised by UNEP, guidance document on NAP development and an established MIA and NAP report template.	5
25	Has the project identified appropriate methods for communication with key stakeholders during the project life? ( <i>If yes, do the</i> <i>plans build on an analysis</i> <i>of existing communication</i> <i>channels and networks</i> <i>used by key stakeholders?</i> )	Yes	The project includes an element/component of knowledge management and sharing, via national meetings and training sessions and webinars. At the national level, will convene a national coordination mechanism that will meet and communicate regularly. there is also two other levels of communication: Country to EA (UNITAR), and EA to UNEP, both respectively reporting semi- annually.	
26	Are plans in place for dissemination of results and lesson sharing at the end of the project? If yes, do they build on an analysis of existing communication channels and networks ?	Yes	Yes, The Mercury Platform provides a virtual communication channel, in addition to sharing reports with the GEF and the Minamata Convention secretariat (and thus their website) virtually. Practically: national inception meetings and project closure meetings are planned in order to share results	

			and lessons learnt.	
Ι.	Financial Planning / Budgeting	YES/NO	<b>Comments/Implications for the</b> <b>evaluation design</b> (e.g. questions, TOC assumptions and drivers, methods and approaches, key respondents etc)	Section Rating
27	Are the budgets / financial planning adequate at design stage? (coherence of the budget, do figures add up etc.)	Yes	Yes, the financial audit should cover this, but the figures add up for initial and revised budgets.	Satisfactory 5
28	Is the resource mobilization strategy reasonable/realistic? (If it is over-ambitious it may undermine the delivery of the project outcomes or if under-ambitious may lead to repeated no cost extensions)	N/A	The project is financed via the Convention's mechanism: a GEF grant and in-kind contribution from Sierra Leone.	
1	Efficiency	YES/NO	<b>Comments/Implications for the</b> <b>evaluation design</b> (e.g. questions, TOC assumptions and drivers, methods and approaches, key respondents etc)	Section Rating
29	Has the project been appropriately designed in relation to the duration and/or levels of secured funding?	Yes		4
30	Does the project design make use of / build upon pre-existing institutions, agreements and partnerships, data sources, synergies and complementarities with	Yes	The project considers existing partnerships at country level.	

	other initiatives, programmes and projects etc. to increase project efficiency?				
31	Does the project document refer to any value for money strategies (ie increasing economy, efficiency and/or cost- effectiveness)?		Yes	The project document details a cost effectiveness analysis/strategy.	
32	Has the project been extended beyond its original end date? (If yes, explore the reasons for delays and no-cost extensions during the evaluation)		Yes	The project has been extended mainly due to delays in delivery, which in turn are caused by delays in disbursement of funds from GEF/UNEP. There was a significant delay in release of funds, around 8 months, which led to a need to extend the PCA in order to deliver results.	
К.	Risk identification and s	Social Safeguards	YES/NO	<b>Comments/Implications for the</b> <b>evaluation design</b> (e.g. questions, TOC assumptions and drivers, methods and approaches, key respondents etc)	Section Rating
<b>К.</b> 33	Risk identification and s Are risks appropriately identified in both the ToC/logic framework and the risk table? (If no, include key assumptions in reconstructed TOC)	Social Safeguards	YES/NO Yes	Comments/Implications for the evaluation design (e.g. questions, TOC assumptions and drivers, methods and approaches, key respondents etc) The risk assessment is implicitly included in the ProDoc.	Section Rating

				consider the diverse socio-economic impacts of assessing the informal gold mining sector, being careful not to create negative impacts	
35	Does the project have adequate mechanisms to reduce its negative environmental foot-print? (including in relation to project management)		N/A	The project's aim is to provide a baseline for information on mercury in the country, therefore it will have no negative environmental footprint. For the NAP's considerations of alternative mining strategies, negative or unintended consequences are considered.	
L.	Sustainability / Replica	tion and Catalytic Effects	YES/NO	<b>Comments/Implications for the</b> <b>evaluation design</b> (e.g. questions, TOC assumptions and drivers, methods and approaches, key respondents etc)	Section Rating
36	Was there a credible sustainability strategy at design stage?		Yes	The combination of assumptions, risk assessment and the scoping nature of the project, provides for a credible sustainability strategy at the design stage.	5
37	Does the project design include an appropriate exit strategy?		No	This does not apply due to the nature of the Enabling Activity.	
38	Does the project design present strategies to promote/support scaling up, replication and/or catalytic action?		Yes	This does not apply due to the nature of the project as a scoping and baseline establishing activity. The project does promote a sustainable communication channel nationally via the national coordination mechanism	
39	Did the design address any/all of the following: socio-political, financial, institutional and environmental		Yes	Clearly stated in section B of the ProDoc.	

	sustainability issues?				
М.	Identified Project Design Weaknesses/Gaps		YES/NO	<b>Comments/Implications for the</b> <b>evaluation design</b> (e.g. questions, TOC assumptions and drivers, methods and approaches, key respondents etc)	Section Rating
40	Were there any major issues not flagged by PRC?		No		5
41	What were the main issues raised by PRC that were not addressed?		N/A		
Ν	UNEP Gender Marker Score	SCORE		Comments	No Rating
42	What is the Gender Marker Score applied by UN Environment during project approval? (This applies for projects approved from 2017 onwards) <b>0 = gender blind:</b> Gender relevance is evident but not at all reflected in the project document. <b>1 = gender partially</b> <b>mainstreamed:</b> Gender is reflected in the context, implementation, logframe, or the budget. <b>2a = gender well</b>	1	Yes	It is specified that the project is to ensure opportunities for women to participate contribute to and benefit from the project outcomes. Meetings specify gender disaggregated data. Gender is reflected in the context, implementation, and budget	

mainstreamed		
throughout: Gender is		
reflected in the context,		
implementation,		
logframe, and the		
budget.		
2b = targeted action on		
gender: (to advance		
gender equity): the		
principle purpose of the		
project is to advance		
gender equality.		
n/a = gender is not		
considered applicable:		
A gender analysis		
reveals that the project		
does not have direct		
interactions with,		
and/or impacts on,		
people. Therefore		
gender is considered		
not applicable.		

#### **NOTES**

1 For Terminal Evaluations/Reviews where a revised version of the project was approved based on a Mid-Term Evaluation/Review, then the revised project design forms the basis of this assessment.

A number rating 1-6 is used for each section: Highly Satisfactory = 6, Satisfactory = 5, Moderately Satisfactory = 4, Moderately Unsatisfactory = 3, Unsatisfactory = 2, Highly Unsatisfactory = 1.

For 'Nature of External Context' the 6-point rating scale is changed to: Highly Favourable = 1, Favourable = 2, Moderately Favourable = 3, Moderately Unfavourable = 4, Unfavourable = 5 and Highly Unfavourable = 6. (Note that this is a reversed scale)

## Annex B: Final Financial Report

ANNEX 13: QUARTERLY EXPENDITURE STATEMENT and UNLIQUIDATED OBLIGATIONS REPORT (US\$)							<u> NRT (US\$)</u>			
Project title:		Development of Minamata Initial Assessment (MIA) and National Action Plan (NAP) for Artisanal and Small Scale Gold								
Project number:		GEF Project ID 9454; 2016/MIA_NAP Sierra Leone TARCW026								
Project ir	nplementing agency/organization:							UN Envir	ronment	
Project ir	nplementation period:	From:			02.11.2	2016		To:		
Reporting	g period:	From:			02.11.2	2016		To:		
		UNEP approved budget							Actual expenditure	es incurred*
UNEP Budget Line			Total project budget as per Amend 1	Expenditures for 2020	2019	2018	2017	2016	Total cummulative expenditures to date	Cummulative unspent balance to-date as per Amend 1
1100	Project personnel									
1101	Project coordinator		41 363		485	20 708	12 794	7 376	41.363	
1102	Project assistant		22 273		13 128	20,100	6 686	2 459	22 273	-
1200	Consultants				-		0,000	2,100	-	-
1201	National Consultants		224,143		189.985	82.227	106,152		378.364	(154,221)
1202	International consultants		106,151		39.994	9.100	, .	20,906	70.000	36,151
1300	Administrative support				-	-,		.,	-	-
1301	Project admin support		24,600		-				-	24,600
1600	Travel on official business				-				-	-
1601	Travel project coordinator/ project staff		40,000		-	9,593	7,614	5,872	23,079	16,921
2100	Sub-contracts (UN entities)				-				-	-
2101	Mercury Global Partnership -UNEP***		50,000		-				-	50,000
3200	Group training				-				-	-
3201	Training on national inventory development		36,213	3,000	-		20,302		23,302	12,911
3300	Meetings/Conferences				-				-	-
3301	National project inception workshop		19,857		-		19,857		19,857	-
3302	Final national lessons learned workshop		25,000	2,801	4,643				7,444	17,556
3303	National Coordination Committee mtgs		50,000		206		12,294		12,500	37,500
4100	Expendable equipment				-				-	-
4101	Operational costs		3,600		3,000				3,000	600
4200	Non-expendable equipment				-				-	-
4201	Computer, fax, photocopier, projector		6,000		6,000				6,000	0
4202	Software		3,000		3,000				3,000	-

5200	Reporting costs			-				-	-
5201	Summary reports, visualization and diffusion	16,000		5,166	5,834	5,000		16,000	-
5202	Preparation of final report	5,000		5,000				5,000	0
5300	Sundry			-				-	-
5301	Communications (postage, bank transfer, etc)	1,800		337	2,663			3,000	(1,200)
5500	Evaluation			-				-	-
5501	Independent terminal evaluation	15,000		-				-	15,000
5502	Independent financial audit	10,000		819				819	9,181
99	GRAND TOTAL	700,000	5,801	271,762	130,125	190,699	36,613	635,000	65,000
***USD65	,000 is maintained with UNEP for the development of gu	idance and glob	al activities, which	ch is impacted to	this project an	d not managed	by UNITAR		
*The actu	al expenditures should be reported in accordance with the	e specific budge	et lines of the ap	proved budget (A	Appendix 1) of t	the project docu	ment in Annex 1		
The appe	nded schedule "Explanation for expenditures reported in	quarterly expen	diture statement	should also be	completed				

## Annex C : List of documents consulted

GEF 2009. The ROtL Handbook: Towards Enhancing the Impacts of Environmental Projects GEF 2016. Report of the GEF to the 7th Session of the Intergovernmental Negotiating Committee on Mercury

GEF 2017. Independent Evaluation Office Chemicals and Waste Focal Area Study

UNDP 2011. Energy & Environment Practice – Gender Mainstreaming *Guidance Series* – Chemicals Management – "Chemicals and gender"

UN Environment 2014. Request for Persistent Organic Pollutants Enabling Activity: Development of Minamata Initial Assessment in Africa

UN Environment 2014. Project Cooperation Agreement for the MIA Project

UN Environment 2016. Evaluation Office: Guidance on the Structure and Contents of the Main Evaluation Report

UN Environment 2019. Terms of Reference for the Terminal Review of the UN Environment/Global Environment Facility project "Development of Minamata Initial Assessment and National Action Plan for Artisanal and Small-Scale Gold Mining in Sierra Leone"

UNEP 2020. "Defining the road ahead: Challenges and solutions for developing and implementing national action plans to reduce mercury use in artisanal small-scale gold mining"

UNEP Project document and logical framework (Sierra Leone)

Project evaluation inception report (March, 2020)

Project Bi-annual narrative reports and financial reports

UNEP medium term strategy and programme of work (2014-2017)

GEF policies, strategies and programme pertaining to chemicals and waste

Annex D: List of participants in multi-stakeholder meetings (please see separate document)

Annex E: Terms of Reference of the Terminal Review (please see separate document)