

**Mid-Term Review of the Project: “Governance  
Strengthening for the Management and  
Protection of Coastal- Marine Biodiversity in  
Key Ecological Areas and the Implementation  
of the Ecosystem Approach to Fisheries (EAF)”**

**GCP/ARG/025/GFF  
GEF: 5112**

**FOOD AND AGRICULTURE ORGANIZATION OF THE UNITED NATIONS  
2020**



---

## Acknowledgments

First and foremost, the Review Team would like to thank the Food and Agriculture Organization of the United Nations (FAO) for allowing us this possibility of carrying out the Mid-Term Review (MTR) of the Project "Governance Strengthening for the Management and Protection of Coastal-Marine Biodiversity in Key Ecological Areas and the Implementation of the Ecosystem Approach to Fisheries (EAF)". We would particularly like to thank the FAO Office staff in Argentina for their administrative, logistic and operational support. Our very special gratitude to Mrs. Natalia Raissa Huykman, who is in charge of the Environment Programme Unit, for her ongoing collaboration and willingness to support our work in all its stages, and to Ms. María Julia Cabello for her contribution to wrapping up the MTR. Furthermore, we wish to thank Mrs. Ina Salas Casasola (FAO OED-RLC) for her methodological guidance, and Mrs. Genevieve Braun for her support throughout the MTR process.

Moreover, we would like to very especially thank the National Technical Coordinator, Antonio de Nichilo, Ministry for the Environment and Sustainable Development (MAYDS), and the Component Coordinators Ms. Paula Cedrola and Mr. Ricardo Delfino Schenke and their collaborators for the valuable information provided, the organization of the interview agenda and their support during the mission.

Finally, we thank the many people we interviewed from national and provincial government organizations, research centers, private sector and NGO leaders, for their great willingness to support us, for their time and contributions to the MTR.

### Review Team

*Teresita Romero Torres, International Consultant*

*Laura García Tagliani, International Consultant*

*Laura L. Belfer, National Consultant*

---

## Acronyms

APN	National Parks Administration
AWP/B	Annual Work Plan and Budget
CBD	United Nations Convention on Biological Diversity
CFP	Federal Fisheries Council
CM	Concept Model
EAf	Ecosystem Approach to Fisheries
EAFMP	Ecosystem Approach to Fisheries Management Plan
FAO	Food and Agriculture Organization of the United Nations
GCU	FAO/GEF Coordination Unit
GEF	Global Environment Facility
JGM	Chief of Cabinet Ministry
LFM	Logical Framework Matrix
LTO	Lead Technical Officer
MAGyP	Argentine Ministry of Agriculture, Livestock and Fisheries
MAYDS	Ministry for the Environment and Sustainable Development (formerly the Government Secretariat for the Environment and Sustainable Development - SAYDS)
MPA	Marine Protected Area
MTR	Mid-Term Review
NBB MPA	'Namuncura/Burdwood Bank' Marine Protected Area
NGO	Non-Governmental Organization
OED	FAO Office of Evaluation
PEU	Project Executing Unit
PIF	Project Identification Form
PIR	Project Implementation Review
PNA	Argentine Coast Guard
PPR	Project progress report
PRODOC	Project Document
PTF	Project Task Force
RC	Results Chain
RLC	FAO Regional Office for Latin America and the Caribbean
RT	Review Team
SNAMP	National System of Marine Protected Areas
SSPyA	Argentine Under-Secretariat of Fisheries and Aquaculture

TCC	Technical Consultative Committee
ToC	Theory of Change
ToR	Terms of Reference

---

## Executive Summary

1. The Mid-Term Review of the project *Governance Strengthening for the Management and Protection of Coastal-Marine Biodiversity in Key Ecological Areas and the Implementation of the Ecosystem Approach to Fisheries (EAF)* aims at assessing project progress over its two years of implementation and at appraising achievements so far, as well as the gaps in fulfilling the foreseen targets. Furthermore, it focuses on identifying the drivers of progress and the factors affecting it, including the analysis of key stakeholder performance and communications. The sustainability of project benefits and progress towards the expected impact were also assessed. The above led to lessons learned in project design, implementation and management and to specific recommendations and the necessary corrective measures to face the final stage of project implementation.
2. The Mid-Term Review covered the period from project start-up (15 June 2017) to 31 December 2019. With regard to geographic coverage, key sites were visited and interviews were held in Mar del Plata (Province of Buenos Aires) and in Puerto Madryn and Rawson (Province of Chubut). The Review took place from 23 September 2019 to 14 January 2020. The evaluation questions were used as a guide for selecting assessment methods, including semi-structured interviews, document review and direct observations in the field. Likewise, the project's Theory of Change was reconstructed to inform the strategy analysis, the design, outcomes and related conditions and assumptions.
3. Mid-Term Review findings lead to asserting that the project's objectives and targets are still pertinent, taking into consideration the country's current political and strategic normative framework, which highlights the importance of marine biodiversity conservation and sustainable fisheries. Nonetheless, changes in the federal administration shifted the political context and the positions of certain key stakeholders, which affected the project's implementation. The project is still pertinent vis-à-vis the UN System's 2016-2020 Development Cooperation Strategy for Argentina and the GEF-7 biodiversity focal area.
4. The project's design has innovative elements and areas for improvement. It is worth noting that it was outlined through a participatory process, bringing together two sectors: fisheries and the environment, whose interaction has been documented as complex. The fisheries industry, however, had limited participation and only contributed to designing Component 2 on the Ecosystem Approach to Fisheries (EAF). This sector has currently stated its opposition to the creation of Marine Protected Areas (MPA), which is considered in the project under Component 1, so there is a risk that the industry may hinder the creation of a new MPA along the Valdes Front. The PRODOC Results Framework reflects an appropriate vertical rationale; nonetheless, it does not describe indicators and assumptions. Moreover, areas for improvement were identified in the proposed outcomes, since some may not be attained due to the lack of legal competency of the executing agencies to do so (e.g. Outcome 1.1., including the creation of a new MPA).
5. With regard to the project's effectiveness, a considerable delay was identified in fulfilling the milestones in the first and second year of Project execution. Ten of the 16 outputs (62%) with milestones set for those two years have experienced delays. As mentioned above, Component 1 has design deficiencies that affect outcome and output achievement; and also, worth noting is the potential partial non-fulfillment of Outcome 1.1. Its main area of progress is centered on generating scientific information for determining the environmental baseline, which will be the main input for setting the boundaries when creating the new MPA. Component 2 has made important progress in mainstreaming EAF in the scallop management plan and in testing good practices to avoid this fisheries bycatch and that of other commercial species. However, there are also delays concerning the activities, in which it is worth highlighting a late start in raising awareness on EAF in the fisheries industry. This brings about uncertainty on whether the Federal Fisheries Council regulations will adopt the basic elements of this approach. Regarding communications, it was noted that the project lacks a strategy in this regard and has thus had

---

for Component 2, in 2019. There are many reasons for this under-execution, *inter alia*, the devaluation of the Argentine peso, changes in government and protracted administrative processes. On the other hand, 43% of committed co-financing has materialized, although there is uncertainty regarding the soundness of the methodology used for its calculation when it is not directly reported.

7. The project's ownership by the Ministry for the Environment and Sustainable Development and the capacities built in the government and research bodies participating in the project, directly support the sustainability of project benefits. Nonetheless, the identified political, social and institutional risks could affect such sustainability. These risks stem from the changes at federal government level in 2019, opposing views among key stakeholders concerning the creation of the new MPA along the Valdes Front, and limited progress in attaining agreements to institutionalize project outputs.
8. It was noted that progress towards the project's expected impact, which is conservation and the sustainable use of marine resources in Argentina, consisted mainly of generating knowledge and information and the systematization thereof. Such progress supports the project's development objectives focused on enhancing knowledge on biological, ecological, social and economic aspects of marine ecosystems and their biodiversity, aimed at managing the protection of key areas for biodiversity and minimizing the negative impact of fisheries thereupon by applying EAF.
9. The lack of indicators and assumptions within the PRODOC's Results Framework led, among other things, to updating said Framework. The update, however, was not effective and thus project follow-up was deemed to be ineffective; furthermore, considering the lack of an efficient M&E system. These issues have made their way into the project's mid-term and annual reports and, therefore, there is a chance to improve the project's M&E.
10. FAO has proven to have technical capabilities and great experience in the topics addressed by the project, besides its capacity to adapt to the new context, although areas for improvement have been identified in the project's design and in the timely revision of some of its outputs by the LTO. Although the advantages of MAYDS providing the National Director and National Technical Coordinator of the project are recognized, its performance has been affected by its vulnerability to government changes and the priorities established and high-level decisions made by the different governments in office. There is no strategy to effectively engage the industrial fisheries sector so as to have an open dialogue to address its main concerns about the creation of the new marine protected area and the adoption of EAF. Likewise, the Federal Fisheries Council -a co-executing agency of this project- and the provinces with a coastline are also reluctant to the creation of the new marine protected area and, therefore, a strategy of engagement of and dialogue with these stakeholders is also required for the project to meet its objectives.
11. Although not stated in the PRODOC, the project has made efforts to mainstream the gender perspective in its activities. The analysis of such efforts shows the need to strengthen them, since the topic has not yet been effectively mainstreamed. The project has addressed environmental and social safeguards because of its inherent nature to preserve natural resources and conceptualize EAF, which includes social, environmental, institutional and economic aspects.

## Conclusions

**Conclusion 1. Appropriateness.** The project's objectives and targets are appropriate considering the country's current political and strategic normative framework, the UN System's 2016-2020 Development Cooperation Strategy for Argentina and the GEF-7 biodiversity focal area.

---

the project. However, the Results Framework does not describe indicators and assumptions, which hinders a clear and strategic understanding of what the project specifically expects to achieve. Other areas of improvement identified are the partial engagement of the fisheries business sector and the lack of an awareness-raising campaign on MPAs targeted to this sector. The above, together with the impact of creating two new MPAs without a sufficiently participatory and consultative process convened by the high-level decision-makers of the Argentine government, are now threatening the possibility of having a bill on MPAs agreed upon by consensus and, moreover, the creation of the new MPA, which may not be achieved because the executing agencies lack the authority to do so.

**Conclusion 3. Effectiveness.** Design issues, the 5-year lag between project design and implementation, changes in government, and high-level political decisions have affected the project's effectiveness. Ten of the 16 outputs (62%) with milestones in years 1 and 2 of the project, have experienced delays in their development. In both components, progress has been made primarily in generating information to determine the baselines that will support the drafting of the new MPA bill, and the management plans for MPAs and scallop fisheries. Limited progress has been made in generating management instruments and, due to design-related problems, Outcome 1.1 will only be partially achieved in view of MAYDS' lack of legal authority to create the MPA along the Valdes Front.

**Conclusion 4. Communication.** The fact that the roles of National Project Director and National Technical Coordinator are played by the executing government institution has limited the project's communication and visibility due to institutional norms and the political handling of the matter at government level. Moreover, due to the lack of clarity in FAO communication policies, it is uncertain whether it will be possible to set up an interactive website exclusively for the project or not. The latter is an element in one of the Output 3.1.1 targets. In view of the above, some projects have been able to set up exclusive websites, whilst others have been unable to do so.

**Conclusion 5. Efficiency.** The project has executed 29.9% of the total project budget, which matches the delay in meeting the project milestones for years 1 and 2. Every year, there has been an under-execution of resources: Component 2 was under-executed by 70% in 2019. Among the reasons for this under-execution are the devaluation of the Argentine peso, the lower amount paid to consultants compared to the United Nations standard amounts, delays in output reviews and in the administrative processes for services procurement, besides the institutional changes that temporarily stalled dialogue with government partners in 2018. Forty-three per cent (43%) of the committed co-financing has materialized, although there is uncertainty on the robustness and validity of the estimates made by PEU on co-financing, which is not directly reported by the partners.

**Conclusion 6. Sustainability.** There are clear risks that could affect the sustainability of project benefits. The main risks identified are political, social and institutional, stemming from the change in federal government authorities in 2019, opposing views among key stakeholders concerning the creation of the new MPA along the Valdes Front, and the limited progress made in reaching agreements to institutionalize the project's outputs. The project's ownership by MAYDS is a fact, although the ownership process by APN -that now plays a primary role in MPA management- is underway, since APN is required to institutionalize the relevant MPA-related project outputs. Additionally, it is recognized that the capacities created at the research centers and other government agencies participating in the project will also contribute to the sustainability of the project's benefits.

**Conclusion 7. Progress towards achieving the foreseen impact.** The generation of information and knowledge, through oceanographic cruises and the historical collection of data framed within the creation of a new MPA along the Valdes Front and the mainstreaming of EAF in the scallop fishery, have so far been the main steps forward to increase conservation and the sustainable use of marine resources in Argentina.

**Conclusion 8. Monitoring and Evaluation.** Although the design of the M&E plan is appropriate, its implementation has been very deficient. Since there was no description of



---

**Conclusion 9. Key stakeholder performance and engagement.** The project's implementation has been affected by changes in the Argentine Government and political decisions made along the way, which have had a greater impact because the National Project Director as well as the Project's Technical Coordinator are MAYDS public officials. The priority that MAYDS gives to the Project varies according to changes in government. It must be underscored that the Federal Fisheries Council (CFP), that is made up differently to when the project was designed, does not support the creation of a new MPA, although CFP is a project co-executing agency. There are also delays in the review and approval of outputs by the LTO. Furthermore, the proposal of two new MPAs made by JGM, without any participatory or consultative process, has fractured communication between MAYDS and CFP, and brought about distrust of the coastal provinces and the fisheries industry with regard to their participation in the project. This problem is currently being solved, although the risk is still there of these stakeholders holding their opposing views, mainly on the creation of an MPA. Engagement of the fisheries industry has been unequal between project components, and the interaction with the provinces calls for improvement. It is worth noting the lack of an open, informed and transparent dialogue forum to address the project's hot topics, such as the creation of a new MPA.

**Conclusion 10. Gender.** PEU efforts are acknowledged to mainstream the gender perspective, by training and issuing recommendations to facilitate mainstreaming in the fisheries sector, above all because GEF did not have this requirement in place when the Project was designed. Anyhow, such efforts have not sufficed to achieve an effective mainstreaming of gender-related matters in the project's activities. PEU does not have a clear understanding of the implications of gender mainstreaming on the project's implementation and, thus, advice and expert follow-up are needed in this matter. Furthermore, the amendment to the Results Framework so as to mainstream the gender perspective and include vulnerable groups has failed because no gender indicators were considered; instead there have been instructions to have gender-disaggregated information, and promote an equal participation of women or youth, as well as getting to know their role in some of the project's activities.

**Conclusion 11. Environmental and social safeguards.** The nature of the Project itself, the conceptualization inherent in EAF and the prestigious universities and research institutes participating in the project's environmental and socio-economic aspects have led to an appropriate consideration of environmental and social issues.

## **Recommendations**

**Recommendation 1 to MAYDS and FAO.** The recommendation is to supplement the project's implementation arrangements by setting up two working groups, within the structure of the Technical Consultative Committee. One to address Marine Protected Areas, and another to focus on the Ecosystem Approach to Fisheries. These working groups would allow an open, ongoing, informed and transparent dialogue on the project, and will particularly allow the following:

- a) Inform and address project progress in Marine Protected Areas, as suggested at the high-level fisheries meeting held in April 2019, and in the Ecosystem Approach to Fisheries. The outcomes of the oceanographic research cruises and other technical studies within the project could be presented and discussed, settling any disagreements and highlighting points of agreement. The Working Group on Marine Protected Areas could become a forum to hear the different voices of stakeholders in favour of and against the creation of Marine Protected Areas along the Chubut Front, start negotiations and agree on the boundaries and zoning.
- b) Sensitize key stakeholders, mainly those that can have a great impact on achieving the project's objectives (e.g. private sector fisheries) to reach a common understanding on Marine Protected Areas and their similarities and differences with other conservation strategies, as well as on the adoption of EAF, among other relevant topics.
- c) Discuss and agree on a work plan with coastal provinces.
- d) Rebuild trust with the provinces and private sector

---

**Recommendation 2 to MMayDS and FAO.** The recommendation is to immediately start lobbying with legislators and other relevant political stakeholders on the proposal to create the new Marine Protected Area along the Valdes Front. The Ministry for the Environment and Sustainable Development and FAO should come into contact with decision-makers who can pass laws at the national and provincial levels. Dialogue could be informal and should start with awareness-raising on the importance and challenges of creating an MPA along the Valdes Front Corridor. The Working Group on Marine Protected Areas mentioned in Recommendation 1 could be harnessed for this purpose. This lobbying should be supported by Non-Governmental Organizations that are experts in the matter. This action would be even more relevant if the NGOs dealing with conservation are taken into consideration, particularly those that are a part of the international network known as Forum for the Conservation of the Patagonian Sea<sup>1</sup> that has been supporting proposals and projects aimed at creating new ocean-related MPAs. This Forum has also been carrying out important efforts to sensitize key stakeholders within the National Executive and Legislative Branches, as a part of its mission to contribute to enhancing and strengthening the management of the national Marine Protected Areas in the region, and thus contribute to achieving Aichi Target 11. Furthermore, with a view to ensuring the timely and efficient attention of the Project's National director and Technical Coordinator to project activities, it is recommended that FAO comes into closer contact with the new authorities of the Ministry for the Environment and Sustainable Development to endorse project-related commitments, including co-financing, and ensure rapprochement with the Argentine Under-secretariat of Fisheries and Aquaculture, the Federal Fisheries Council and other partners.

**Recommendation 3 to GEF and FAO.** Considering the importance of having a Results Framework that is complete, effective and robust for appropriate project implementation, monitoring and evaluation, the recommendation is for the Global Environment Facility not to approve projects that have Results Frameworks that are incomplete, lack indicators, assumptions and mid-term targets. Furthermore, it is recommended that the FAO-GEF Coordination Unit, FAO Argentina and the FAO Regional Office for Latin America and the Caribbean design projects having a Results Framework based on technical foundations for building a logical framework matrix.

**Recommendation 4 to PEU and FAO.** The recommendation is to strengthen and again supplement the PRODOC's Results Framework and reinforce the project's monitoring, through a counter-proposal including SMART indicators and assumptions, in agreement with the targets established within the PRODOC's Results Framework for each output and outcome. In this regard, the support of the FAO Office of Evaluation could be requested, as well as that of the FAO-GEF Liaison Coordination Unit. Furthermore, to reinforce Project follow-up, the recommendation is to develop an Excel tool allowing: Project progress monitoring pursuant to the reinforced Results Framework; the follow-up of co-financing using an homogeneous and robust methodology; appropriate systematization and follow-up of the project's financial statements; and the follow-up of project risks as spelled out in the PIR and the documentation on the adaptive measures implemented. Additionally, the recommendation is to hire an expert in Monitoring & Evaluation to design and operate the tool in support of the Project's Technical Coordinator.

**Recommendation 5 to MMayDS, SSPyA and CFP.** The recommendation is to formally institutionalize the management documents prepared in a participatory manner within the project, and agreed upon by consensus among the competent agencies, so that they are duly adopted through customary administrative procedures. For this purpose, it is necessary to have the Project Executing Unit design an effective strategy to promote this process with greater determination, which will directly contribute to the sustainability of project benefits. Among them, is the Output on "Guidelines for outlining Marine Protected Area Management Plans".

**Recommendation 6 to PEU, FAO and MMayDS.** With the purpose of making the review and authorization of project outputs more agile, the recommendation is to outline, agree upon and

---

the nature of the causes for delay, review times could be diminished, ensuring their strict compliance therewith and/or the number of necessary reviewers or authorizations could be simplified.

**Recommendation 7 to PEU and MArDS.** The recommendation is to design and implement a comprehensive, effective communication strategy agreed upon by consensus, involving the new communications unit of the Ministry for the Environment and Sustainable Development, to thus improve the project's visibility. Additionally, it must be confirmed whether, according to FAO communication regulations in force, the project can develop an exclusive, interactive website, which is, overall, necessary to strengthen the implementation of Component 3.

**Recommendation 8 to MArDS and FAO.** With a view to ensuring the effective mainstreaming of the gender perspective in the project, it is recommended that the FAO Regional Office for Latin America and the Caribbean and the Ministry of Women, Gender and Diversity provide their expert support. Moreover, the suggestion is to consult with FAO Fisheries Division experts to draw lessons learned on the topic. This would reinforce progress made by the project in this field and would provide clarity on the activities to be carried out within each project output or outcome, so as to appropriately mainstream the gender perspective when deemed advisable.

**Recommendation 9 to MArDS, FAO and PEU.** The recommendation is to perform a financial analysis to determine whether, in fact, there will be any remaining resources stemming from the devaluation of the Argentine peso against the dollar and from savings in the disbursements foreseen in the PRODOC to pay the fees of consultants hired by the Project, which have been lower than expected and, if so, outline a new planning for the following years of project execution and determine the use that could be made of the remaining resources

**Recommendation 10 to MArDS, FAO and PEU.** It is recommended that, in July 2020 at the latest, the opportunity and advisability of requesting a project extension be analyzed, in accordance with the progress made to ensure fulfillment of the foreseen objectives. Initially a one-year extension would be recommended at no additional cost.