TERMINAL REVIEW OF THE UNEP/GEF ENABLING ACTIVITY 9533

"DEVELOPMENT OF NATIONAL ACTION PLAN FOR ARTISANAL SMALL-SCALE GOLD MINING IN MALI AND SENEGAL"

Mali

Senegal

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November 2020

About the Evaluation[1]

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 Artisanal Gold Council (AGC). The main objective of the project is to facilitate the use of scientific and technical knowledge and tools by national stakeholders in Mali and Senegal to develop the Artisanal and Small-Scale Gold Mining (ASGM) National Action Plans (NAPs) thus enabling Mali and Senegal to comply with 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 countries.

[1] *This data is used to aid the internet search of this report on the Evaluation Office of UNEP Website*

Contents

Project Identification table

Executing Agency:	Artisanal Gold Council			
Sub-programme:	Chemicals and Health	Expected Accomplishment(s):	National Action Plans for ASGM in Mali and Senegal	
UN Environment approval date:		POW 2016-17 Output(s):	(a)(1); (a)(3); (a)(5)	
GEF project ID:	9533	Project type:	EA	
GEF Operational Programme #:	2	Focal Area(s):	Mercury	
GEF approval date:	12 July 2016	GEF Strategic Priority:	Mercury	
Expected start date:	September 2016	Actual start date:	4 November 2016	
Planned completion date:	30 October 2018	Actual completion date:	April 2020	
Planned project budget at approval:	$ 1,000,000	Actual total expenditures reported as of April 2020:	$ 981,704	
GEF grant allocation:	$ 1,000,000	GEF grant expenditures reported as of April 2020	$ 981,704	
Project Preparation Grant - GEF financing:	n/a	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:	4 November 2016	Date of financial closure:	April 2020	
No. of revisions:	1	Date of last revision:	March 2018	
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):*	February 2020	Terminal Review (actual date):	May 2020	
Coverage - Country(ies):	Mali and Senegal	Coverage - Region(s):	Africa	
Dates of previous project phases:	n/a	Status of future project phases:	n/a	

Executive Summary

Evaluation overview

1. This review is the output of the Terminal Review process of the **enabling activity (EA)** entitled "Development of National Action Plan (NAP) for Artisanal and Small-scale Gold Mining (ASGM) in Mali and Senegal", executed by the Artisanal Gold Council (AGC) and co-executed with the Ministry of Environment, Sanitation and Sustainable Development (MEADD) of Mali, and the Ministry of Environment and Sustainable Development (MEDD) of Senegal . The UN Environment Programme (UNEP)/ Global Environment Facility (GEF) total budget is $1,000,000 and in-kind co-financing from the national governments. The main objective of the project is to contribute to the implementation of the Minamata Convention through the reduction of the risks posed by the unsound use, management and releases of mercury in the ASGM sector. Both Mali and Senegal have ratified the Minamata Convention on Mercury: Mali on 27 May 2016 and Senegal on 3 March 2016. Both Mali and Senegal notified the Minamata Secretariat that mercury emissions from the ASGM are more than insignificant in the country: for Mali on 01 March 2016 and for Senegal, on 31 December 2015.

2. The GEF operational focal point endorsed the development of an ASGM National Action Plan in Mali and Senegal with UNEP as Implementing Agency. The project was developed based on the guidelines for the development of ASGM National Action Plans, approved by the Minamata COP. The GEF Chief Executive Officer endorsed the project on 12 July 2016 as part of GEF's efforts to achieve the objectives of its Chemicals and Waste Focal Area Strategy, in particular goal 1 "develop the enabling conditions, tools and environment for the sound management of harmful chemicals and wastes"; program 2 "support enabling activities and promote and promote their integration into national budgets and planning processes, national and sector policies and actions and global monitoring .

3. The project framework followed the guidance document on the development of a national strategic plan developed by the UNEP Global Mercury Partnership[2] and revised on the basis of experience in its usage. The guidance has been developed with the intention of addressing ASGM in a holistic manner and includes a review of legal, educational, economic, regulatory and enforcement frameworks, and provides guidance on developing budgets and workplans and identifying potential sources of funding and partners.

4. The objective of the NAP project was to facilitate the use of scientific and technical knowledge and tools by national stakeholders in Mali and Senegal to develop the ASGM National Action Plans. The assessment also aimed to reinforce the national coordination mechanism on chemicals management, as it is currently operational in the countries, by ensuring specific mercury considerations are also addressed without duplicating efforts. Mali and Senegal would benefit from new and updated information about the respective national mercury situation, use of mercury and past policy approaches that have been successes and failures in formalizing and improving the environmental performance of the ASGM sector in each country, and from increased capacity in managing the risks of mercury emitted and released from such activity. The ASGM NAP would be a roadmap for Mali and Senegal to comply with article 7 of the Minamata Convention. The sharing of experiences and lessons learned throughout the project was also expected to be an important contribution to other countries

[2] Guidance Document: Developing a National Strategic Plan to Reduce Mercury Use in Artisanal and Small-Scale Gold Mining, available at http://www.mercuryconvention.org/Portals/11/documents/meetings/inc7/English/7_17_e_ASGM.pdf.

with similar socio-economic profile within the region.

5. The project aimed to protect human health and the environment from the risks posed by the emissions and releases to the environment of mercury from artisanal and small-scale gold mining and processing in Mali and Senegal by developing NAPs in compliance with Annex C of the Minamata Convention. This includes planning for a variety of policy and market-based tools to assist in supporting and developing the ASGM sector into a viable and sustainable economic activity, which is recognized by the Minamata Convention as an important component of NAPs for ASGM.

6. The project about ASGM NAP development in Mali and Senegal had two major components with the key outcome that Mali and Senegal developed and submitted NAPs in compliance with Annex C of the Minamata Convention to guide their future action in reducing mercury emissions and releases from, artisanal and small-scale gold mining and processing. **.** It had 2 major components: Component 1: Global Technical Support for NAP Development and Component 2: Endorsement and submission of the National Action Plans to the Minamata Secretariat

Review Methodology

7. The review analyzed project documentation, country-produced assessment reports, and carried out interviews via telephone, in person, electronic/on-line surveys with relevant persons of the project executing agency (Artisanal Gold Council), ASGM NAP global component, the national project coordinators in Mali and Senegal and project stakeholders 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	HS
2. Alignment to GEF/Donor strategic priorities	HS
3. Relevance to regional, sub-regional and national environmental priorities	HS
4. Complementarity with existing interventions	HS
B. Quality of Project Design	**Satisfactory**
C. Nature of External Context	**Favourable**
D. Effectiveness	**Satisfactory**
1. Achievement of outputs	S
2. Achievement of direct outcomes	S
3. Likelihood of impact	**Likely**
E. Financial Management	**Satisfactory**
1.Completeness of project financial information	S
2.Communication between finance and project management staff	S
3.Compliance with UN Environment standards and procedures	S
F. Efficiency	**Satisfactory**
G. Monitoring and Reporting	**Satisfactory**
1. Monitoring design and budgeting	S
2. Monitoring of project implementation	S

3.Project reporting	Complete
H. Sustainability	**Moderately Likely**
1. Socio-political sustainability	L
2. Financial sustainability	ML
3. Institutional sustainability	ML
I. Factors Affecting Performance	**Satisfactory**
2. Quality of project management and supervision	S
3. Stakeholders participation and cooperation	HS
4. Responsiveness to human rights and gender equity	S
5. Country ownership and driven-ness	S
6. Communication and public awareness	S
Overall Project Rating	**Satisfactory**

Key Findings, Lessons Learned and Recommendations

8. The project enabled delivery of an ASGM National Action Plan that would facilitate compliance of Mali and Senegal with article 7 (ASGM) of the Minamata Convention which both countries have ratified. At the time of this evaluation, Senegal and Mali have completed and submitted their final ASGM NAPs to the secretariat of the Minamata Convention in November 2019 and in March 2020 respectively.

9. The project enabled Mali and Senegal to collect baseline information relevant to ASGM in both countries on which they based their national targets and reduction objectives in relation to the ASGM sector. The implementation strategy is comprehensive that includes strategies to reduce mercury emissions, releases, and exposure; actions to eliminate worst practices; facilitation of formalization and regulation; managing mercury trade and prevention of diversion; stakeholder engagement; public health strategy; and financial strategy to encourage mercury-free gold production. The ASGM NAPs therefore serve as the countries' roadmap to comply with Minamata Convention article 7 (ASGM), protecting human health and the environment from the anthropogenic effects of mercury. Using the necessary scientific and technical knowledge and tools, the project delivered complete ASGM NAPs that allows mercury to be mainstreamed in the country's priorities. Drawing on the earlier Minamata Initial Assessments in both countries, the ASGM NAPs provided additional awareness on mercury and its compounds at the national level. Globally, Senegal and Mali respectively, are the second and fifth countries that have submitted their ASGM NAPs to the Minamata Convention secretariat.

~~10.~~ 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 on chemicals and waste. Relevance to national priorities and needs was highlighted especially in the ASGM sector. It highlighted the links to the country's priorities as embodied in the both Mali and Senegal's UN Development Assistance Framework (UNDAF) and in meeting the relevant sustainable development goals. The project document provided very good background on Mali and Senegal's mercury activities and the ASGM sector and existing coordination mechanisms. The **strategic relevance** places the project in the context of UNEP's mandate and GEF's priorities as well as the national priorities in both countries and is **satisfactory**

11. The strengths of the design include the strategic relevance, stakeholder analysis, background on mercury and ASGM activities in previous projects, the governance and supervision arrangements, and

the risk identification and social safeguards. 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 narrative form. 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. Gender roles and equity was mainstreamed. The project document states that the approach to formalization is a human rights-based approach, focusing on the protection of the marginalized and vulnerable population. Socio-economic factors were also considered. The project design did not mention recognizable risk in project execution; **thus, the nature of external context was favorable.**

12. The project was **effective and efficient in delivering the outputs and desired outcome** despite the challenges in Mali and Senegal. Mali had administrative challenges in terms of internal coordination and communication, management of contractors, as well as deficits in the technical and reporting capacities of some of the national experts. One contractor in Mali suddenly left the project and did not endorse data collected. Senegal had a change in the leadership of the Ministry of Environment and input provided by the miners were of poor quality. These events led to the delay in the conduct of the workshops and overall project delivery. However, the Artisanal Gold Council (AGC) as the EA made contingency plans to address the issues especially in Mali where there was a gap in the project co-executing partner and the subcontractors. The AGC stepped in using project and its own resources in order to provide project continuity such as by providing its own staff to conduct activities at on the ground and by training again the miners in Senegal. The AGC also developed its own guidance on health institutional capacity assessment, rapid health situation assessment and public health strategy that were not available in the ASGM NAP guidance. A project revision was done in terms of extending the project timeline to allow more time for AGC to fill in the gaps in Mali's administrative vacuum, to conduct national consultations/validation workshops and for the EA to finalize and improve on the reports on the ASGM NAPs.

13. Due to administrative delays, an extension was requested which was granted by the IA to EA~~;~~ A more realistic timeframe would benefit future projects. Despite delays, the project was able to deliver the outputs that led to the desired outcome of ASGM NAPs developed in Mali and Senegal and submitted to the secretariat of the Minamata Convention.

14. Achievement of outcomes could be attributed directly to the project which is "enabling" in nature, to the good quality of project design, stakeholders' participation, communication and public awareness, contingency plans of the IA and EA, project management and supervision, monitoring and reporting and financial management. Responsiveness to human rights and gender equity was highlighted in the ASGM NAPs. Furthermore, the ASGM global component through the Global Mercury Partnership also provided knowledge materials as valuable input into the final outcome. Through this project, Mali and Senegal were enabled to deliver and submit their ASGM NAPs and **likelihood of impact (protection of human health and the environment from the hazards of mercury) is likely**.

15. The project **ensured sustainability by training local consultants** on how to do mercury assessments in the ASGM sector. 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 in relation to mercury trade and to ensure financial sustainability such

as by engaging the private sector. Mali and Senegal also need to build bilateral and multilateral relationships with donors for financing their ASGM NAPs.

16. The project's **strengths** have been the quality of project design, preparation and readiness, stakeholder participation, cooperation and partnerships, smooth collaboration among the government agencies and stakeholders (especially the mining community) that delivered on the NAP. There was also regular communication between the executing agency (AGC) and the national co-executing partners as well as with the implementing agency (UNEP) addressing issues and concerns during implementation. The selection of the appropriate project national coordinator for the NAP in Senegal also considered a strength of the project. Regular stakeholder consultation at country and local levels led to country ownership and drivenness.

17. **Awareness raising** was embedded in all project activities such as workshops and the NAP strategies included activities to further raise awareness of policymakers and stakeholders especially miners.

18. **Gender roles, sex-disaggregated data, socio-economic dimensions and links to poverty alleviatio**n were highlighted in the project document and the NAPs. Although collection of disaggregated data was a challenge due to gender- based culture norms and sensitivities, gender roles were highlighted in the ASGM NAP. .A human rights-based approach for formalization made focus on vulnerable populations at risk (women, youth, and children) in the ASGM NAP.

19. The project's **weaknesses** have been mainly the administrative delays due to internal conflicts (communication and coordination) in Mali that resulted in delayed reporting that in turn resulted in delays of fund release from IA to EA. There was also delay due to the change in leadership in the Ministry of Environment in Senegal.

20. In terms of the process and quality of delivering NAP, the project benefitted by a series of reviews at the national level and by experts at the EA and IA, as well as by experts at the Global Mercury Partnership.

21. Overall, this enabling project was able to deliver on the outputs and outcomes, with the support of the able executing agency experts and the implementing agency Task Manager. Mali and Senegal have submitted their NAPs to the secretariat of the Minamata Convention on Mercury and are on the road to complying with article 7 (ASGM) of the Minamata Convention, ultimately protecting human health and the environment from the toxic effects of mercury.

22. Lessons Learned

Lesson 1: The Executing Agency (EA) must hold pre-implementation information/expectation setting sessions with the countries. These pre-contract meetings could set expectations and ensure full understanding of the project expected outcome and outputs. Early contracts between the Executing Agency and National Co-Executing partners should be in place to ensure timely compliance and delivery of outputs. 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: Contracts/agreements between the IA and EA and with the partner executing agency need to highlight activity and monitoring timelines. This will avoid project extensions and ensure timely delivery of specific outputs.

Lesson 3: The EA needs to anticipate capacity building needs of national partners in terms of technical, operational and administrative capacities. Countries need support especially in ASGM socio-economic assessments and the public health strategy.

Lesson 4: The selection of the national project team especially an appropriate national project coordinator is crucial to the delivery of project outputs. The team should have a balance of one with skills in ASGM and another with strong analytical and writing skills. Contracts with consultants need to specify data submission protocols where data collected in the departure of the relevant consultant, becomes a property of the project.

Lesson 5: A more realistic timeframe will benefit the project, allowing contingencies for unexpected events at country level such as issues with human resource in the national project team.

Lesson 6: Constant and regular communication between the project IA and EA addressing issues and concerns throughout execution contributes to positive delivery of outputs. Project monitoring enabled the EA to provide contingencies when Mali encountered administrative challenges.

Lesson 7: Regular multistakeholder engagement and consultation at local and country level is key to delivery of project outputs and project sustainability.

Lesson 8: Gender specific (female) relevant data and disaggregated data were difficult to obtain due to gender-based cultural norms.

Lesson 9: The project delivered a methodology on the data collection protocol for public health strategies that could be replicated in other countries in the region.

Lesson 10: Project sustainability could be ensured by having socio-political and institutional sustainability such as in the case of Senegal. Given that ASGM NAP is relevant to priorities in both Mali and Senegal, this could be a good starting point for them to seek funds for their ASGM NAP implementation. Both need to engage with other countries in the Economic Commission of West African States subregion (ECOWAS) and agree on a common approach towards mercury trade and financial sustainability. Both countries may need to form bilateral and multilateral relationships with international organizations and donors for the financing mechanism of the NAPs.

23. Recommendations

The following are recommendations for future projects of similar nature, ie, enabling projects dealing with initial assessments and drafting of national action plans. Recommendations are addressed to the implementing agency (IA), executing agency (EA) and project executing partners/national project coordinators.

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

Recommendation 1 for the EA: The EA and its executing partner (in this case the national governments) need to be in contact even before project implementation in order to share expectations and express needs. The EA, its executing partners and stakeholders need to be engaged in the project design stage to have a sense of ownership of the project upfront. A rapid assessment of project profile of sectors especially the miners will facilitate miners' engagement with government in the project.

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

Recommendation 3 for the EA: The EA needs to anticipate and address realistically the capacity needs (technical, administrative, and operational) of countries and plan accordingly.

Recommendation 4 for the EA: The EA needs to carefully select the composition of the project team-national project coordinator and members with skills in analysis, writing, and knowledge on ASGM. Designation of the appropriate national coordinators (with track record of delivery) could ensure project success. Contracts with consultants or individual contractors need to specify protocols of data submission to avoid losing data upon sudden departure of the consultant or individual contractor.

Recommendation 5 for the EA: National level administrative challenges such as change in project personnel need to be factored in planning project execution to avoid administrative delays.

Project forecasts both for substantial and financial aspects need to consider recommendations 4 and 5.

During the implementation phase of the project,

Recommendation 6 for the IA, EA, and national project coordinators: Constant and regular communication between the IA and EA and national coordinators must be maintained in order to address issues that may arise during project execution.

Recommendation 7 for the EA and national project coordinators: Continue regular consultation and engagement of stakeholders to ensure delivery and sustainability of project results.

Recommendation 8 for the EA and national project coordinators: Have a female member of the project team in order to collect female related and disaggregated data in culturally sensitive countries. Gender mainstreaming in future projects could also be done by having a gender awareness training as part of the project.

Recommendation 9 for the EA: The methodology for data collection in relation to the public health strategy is a significant project contribution that could be replicated in other Africa countries ASGM NAPs.

Post project implementation

Recommendation 10 for 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 mercury trade and financing sustainability. Mali and Senegal may need to form bilateral and multilateral relationships with international organizations and donors for the financing mechanism of the NAPs.

I: Introduction

24. This report presents the terminal review of the **enabling activity** project entitled “Development of National Action Plans (NAPs) for Artisanal Small-scale Gold Mining (ASGM) in Mali and Senegal”. The

project objective is to protect human health and the environment from the risks posed by the emissions and releases to the environment of mercury from artisanal and small-scale gold mining and processing in Mali and Senegal by developing NAPs in compliance with Annex C of the Minamata Convention. This includes planning for a variety of policy and market-based tools to assist in supporting and developing the ASGM sector into a viable and sustainable economic activity, which is recognized by the Minamata Convention as an important component of NAPs for ASGM in compliance with the article 7 (ASGM) of the Minamata Convention.

25. Both Mali and Senegal have ratified the Minamata Convention on Mercury: Mali on 27 May 2016 and Senegal on 3 March 2016. Both Mali and Senegal notified the Minamata Secretariat that mercury emissions from the ASGM are more than insignificant in the country: for Mali on 01 March 2016 and for Senegal, on 31 December 2015, in accordance with article 07 of the Minamata Convention. The GEF operational focal points in Mali and Senegal endorsed the development of an ASGM National Action Plan in Mali and Senegal.

26. The project aimed at ASGM NAPs was endorsed by the GEF CEO in July 2016, with an initial planned duration of 24 months, from the first disbursement of funds in November 2016 but was extended at no cost for 30 months. The ASGM NAP project in Mali and Senegal was implemented by the United Nations Environment Programme (UNEP), with funding from the Global Environment Fund (GEF) and executed by the Artisanal Gold Council (AGC), that has extensive experience on artisanal and small scale gold mining and has track record in supporting countries address ASGM issues. AGC participated in the development of the guidance in developing ASGM NAPs, stipulated in article 7 of the Minamata Convention. The project was co-executed with Ministry of Environment, Sanitation and Sustainable Development (MEADD) of Mali, and the Ministry of Environment and Sustainable Development (MEDD) of Senegal, enabling ownership of the project since its inception. In April 2020, roughly 98 % $ 981,704 of the total ($ 1,000,000) UNEP/GEF budget has been disbursed. This final review is addressed to the government and stakeholders of Mali and Senegal, the executing agency, the implementing agency and other countries or agencies that could benefit from the experience of in drafting their ASGM National Action Plans

27. The project was aligned with UNEP's Programme of Work (PoW) 2016-2017 through its expected accomplishment A. under "the Chemicals and Waste Subprogramme", 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 also aligns with GEF focal area strategy 1 of the chemicals waste area which is "*Develop the enabling conditions, tools and environment to manage harmful chemicals and wastes ».*

II. The Review

28. The review was carried out from March to May 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.

29. 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 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.

30. The review had aimed to be as participatory as possible, and the evaluator was in contact with the Artisanal Gold Council and ASGM project national coordinators of Mali and Senegal. It was not possible to arrange travel to both countries 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 project coordinators from the co-executing agencies - Ministry of Environment, Sanitation and Sustainable Development (MEADD) of Mali, and the Ministry of Environment and Sustainable Development (MEDD) of Senegal, executing agency (AGC), with the technical experts on NAP, and with the staff of the global component (Global Mercury Partnership). On-line survey was sent to key stakeholders in Mali and Senegal. No peer review of the ASGM NAPs was done.

31. 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 (1 from Mali and 2 from Senegal) were interviewed and 6 (2 from Mali and 4 from Senegal) 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.

32. The review also makes reference to the ASGM National Action Plans of Mali and Senegal available at the time of review. Key strategic questions on the development of ASGM NAPs are included in the report.

III. The Project

Context

33. The project is an **enabling activity** in nature, and the ASGM NAPs in Mali and Senegal 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 and the legislative framework in the ASGM sector in both countries and was therefore a baseline establishing project to be considered as the basis in drafting ASGM NAPs

34. The goal of the project is to contribute to the implementation of the Minamata Convention through the reduction of the risks posed by the unsound use, management and releases of mercury in the ASGM sectors.

35. The project objective is to protect human health and the environment from the risks posed by the emissions and releases to the environment of mercury from artisanal and small-scale gold mining and processing in Mali and Senegal by developing NAPs in compliance with Annex C of the Minamata Convention. This includes planning for a variety of policy and market-based tools to assist in supporting and developing the ASGM sector into a viable and sustainable economic activity, which is recognized by the Minamata Convention as an important component of NAPs for ASGM.

36. The project framework follows the guidance document on the development of a national strategic plan developed by the UNEP Global Mercury Partnership3 and revised on the basis of experience in its usage. The guidance has been developed with the intention of addressing ASGM in a holistic manner and includes a review of legal, educational, economic, regulatory and enforcement frameworks, and provides guidance on developing budgets and workplans and identifying potential sources of funding and partners. The project was developed based on the guidelines for the development of ASGM National Action Plans, approved by the Minamata Conference of the Parties.

MALI

Background of Mali (Source: Mali ASGM National Action Plan Chapters 1-3)

37. Chapter 2 in the NAP of Mali highlights Mali as the fourth largest industrial gold producer in Africa, behind Ghana, South Africa and Sudan. Gold is the country's main export, accounting for 64% of total exports and 21% of government revenue in 2018[3]. Artisanal and small-scale gold mining in Mali is considered a centuries-old activity. It goes back several centuries and has made the history of the country.

38. This activity is practiced mainly in the regions of Kayes, Koulikoro and Sikasso. It maintains traditional exploitation practices with rudimentary techniques. These techniques have evolved with the introduction of ore grinders, motor pumps and tricycles. There is also evidence of new artisanal gold mining in the Kidal region. The Kayes region is where the activity is most active. 45.6% of the sites are in the Kayes region, compared to 40.4% in Sikasso and 14% in Koulikoro. According to the 2018/2019 study [1]on Mali's gold ASGM, the country's mining population is estimated at 512,605 people, including 298,307 in the Kayes region, 162,898 in Sikasso and 51,400 in Koulikoro. Of this population, 34.70% are foreigners, mainly from neighbouring countries such as Guinea, Burkina Faso, Côte d'Ivoire and Senegal. Children and women are also strongly present in the area. Indeed, it is estimated that nearly 38% of the workforce is composed of women (194,362) and 9% of children (45,753).The use of chemicals in the gold EPAS activities, in particular mercury, was identified in the study as having adverse effects on human health and the environment. It was estimated that approximately 33.3 t/year of mercury is used in the sector.

Institutional, political, and governance structure of Mali

39. Chapter 3 in the NAP of Mali describes the governance of the ASGM sector and is governed by the following:

[3] Guidance Document: Developing a National Strategic Plan to Reduce Mercury Use in Artisanal and Small-Scale Gold Mining, available at http://www.mercuryconvention.org/Portals/11/documents/meetings/inc7/English/7_17_e_ASGM.pdf.

a. The Mining Code, Law No. 2012-015 of 27 February 2012 on the Mining Code;

b. Decree No. 2012-311/P-RM of 21 June 2012 establishing the conditions and modalities of application of the law on the Mining Code. This implementing decree was amended in 2013 (Decree No. 2013-690-P-RM of 28 August 2013).

40. With regard to commercial activity, the following shall apply:

a. Decree No. 02-536/PRM of 3 December 2002 regulating the collection, processing and marketing of gold and other precious or fossil substances;

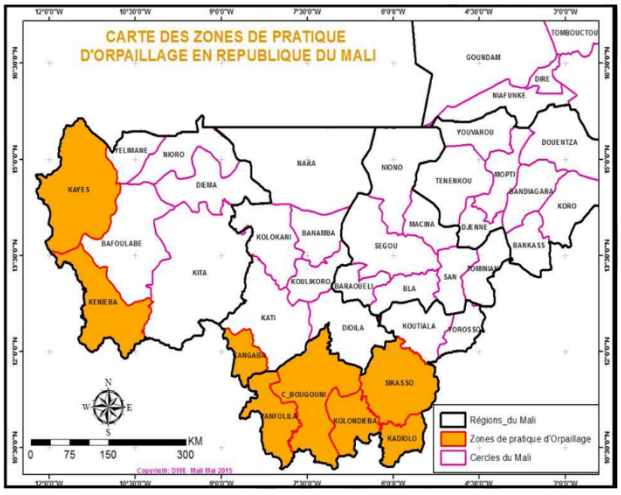
b. Interministerial Order No. 03-0239/MIC-MMEE-MEF of 17 February 2003 laying down the conditions for the approval and operation of collectors, purchasing and export counters, and exporters of jewelry and works of art made of gold or other precious or fossil substances that operate in the sector.

41. On the question of mercury, the only text in Mali's legal arsenal is Decree No. 07-135/P-RM of 15 April 2007 establishing the list of hazardous waste, article 1-2 of which refers to mercury and mercury compounds. According to this provision, the import, storage, transit, offer or sale, acquisition or disposal for consideration or free of charge, possession, transformation, destruction, neutralization and disposal of hazardous waste from other countries are prohibited and punishable.

42. The Ministry of Mines and Petroleum (MMP), established by Decree No. 09-157/P-RM of 9 April 2009, is responsible for formulating and implementing the national mineral resources development policy. It is the supervisory department in charge of managing the mining sector in Mali.

Specific Actions on ASGM in Mali

Map of ASGM regions in Mali



43. In recent years, Mali has developed several programmes to improve the gold ASGM sector. In 2009[4], a sub-regional workshop was organized by UNIDO in Mali with the participation of French-speaking

[4]https://pubs.iied.org/pdfs/G00727.pdf?https://wedocs.unep.org/bitstream/handle/20.500.11822/12852/Conference_de_Bamako_sur_l%27orpaillage.pdf?sequence=1&isAllowed=y

West African countries to discuss issues related to gold panning. The objective of the workshop was to inform participants about environmental and health risks, as well as alternative technologies to reduce the use of mercury in gold panning.

44. The project document states that Mali participated in the regional SAICM funded project “Reducing Mercury Risks from Artisanal and Small-Scale Gold Mining in Mali” aimed at reducing the health and environmental impacts of mercury in ASGM communities. This objective was attained through the promotion of the ESM of chemicals and by strengthening local and national capacities to effectively reduce mercury use, its emissions and exposure. The project was launched in 2012 and included the development of a National Plan to reduce mercury use in the ASGM sector.

45. In 2003, a nine-year project entitled "Technical assistance for gold panning, promotion of rural women and small-scale mineral exploitation (ATOPFER)"[5]was developed to promote technical assistance for gold panning, alleviate the hardship of women's work and diversify their sources of income. This project was financed by the World Bank under the Heavily Indebted Poor Countries (HIPC) initiative.

46. In 2001, a Global Environment Facility (GEF) funded project for the rehabilitation of gold panning sites in the Kenieba circle was implemented. In the same year, the regional project entitled "Eradication of the pauvreté and development of sustainable livelihoods in artisanal mining communities" was launched, with the support of the United Nations Department of Economic and Social Affairs (UNDESA) and the International Labour Office (ILO).

47. In 1997[6], the Malian government set up a programme called "Promotion de l'Artisanat Minier et Protection de l'Environnement (PAMPE)[7] ", in collaboration with the United Nations Development Programme (UNDP). This project aimed to strengthen institutional capacities in the environment sector, the development of the mining crafts sub-sector and its organization. In the same year, geological studies were carried out to determine the mining potential in 5 areas specifically designated for gold panning. The project was financed by the Malian State.

48. In 1992, the Economic Commission for Africa (ECA) carried out several thematic studies on legislative, regulatory and organizational aspects in Liptako-Gourma member countries.

49. In 1988, Liptako-Gourma organized seminars over a period of 6 years on the development and promotion of artisanal mining activity, with a view to harmonizing regulations in the three countries of the sub-regional organization: Burkina Faso, Mali and Niger.

Trade and Economic Activity on ASGM in Mali

50. Gold produced by ASGM in Mali is first sold by gold panners to collectors on site or to itinerant buyers. The latter then resell the gold to independent traders and buying stations, usually located in large towns. The middlemen bring the gold to Bamako. The gold is finally sold to gold refineries and/or directly exported abroad.

51. Gold ASGM is a very important activity in Mali's economy. According to the study conducted in

[5] https://www.rse-et-ped.info/wp-content/uploads/2016/01/ORPAILLAGE-AU-MALI-ET-CAS-DU-PROJET-ATOPFER.pdf
[6] https://pubs.iied.org/pdfs/G00727.pdf?p.25
[7] https://pubs.iied.org/pdfs/G00727.pdf? p.25

2018/2019, the EMAPE brings in about CFAF 729 billion per year, or US$1.23 billion. It is estimated that the average annual income of a miner is US$5,167. This income varies according to the mineral wealth of the sites, the scale of the activity, the role of gold miners at the mine site and the number of days worked per year. The income ranges from US$618 to US$9,904.

There are a number of related activities in the Gold EPAS areas, such as trade, catering, machinery repair, especially at large sites, water sales and transport, forging and transportation. It should be noted that agriculture is also practised by indigenous people, including gold panners, but mainly during the rainy season.

Environmental and Health Impacts of ASGM in Mali

52. The environmental risks identified at mine sites are largely related to the use of chemicals, such as mercury and cyanide, which affect fauna, flora, water resources, soil and air. Other environmental problems caused by the gold ASGM in Mali include the following:

- Deforestation caused by clearing of vegetated areas and erosion;
- Habitat loss (biocenosis) and land degradation ;
- Water pollution by sediment;
- The drying up of rivers by dredging in the Niger and Falémé rivers;
- The alteration of the water table by excessive pumping.
- Proximity to certain forests and reserves, or migration routes of protected species.
- Other not insignificant phenomena that pollute the environment at gold panning sites include the release into the environment of used batteries that contain lead, as well as plastic bags.

53. Common health problems in ASGM sites include:

Physical trauma (accidents at work, accidents on the public highway, assaults, assault and battery); Gastroenteritis (amoebiasis, salmonellosis and other food poisoning); Acute respiratory infections, including bacterial pneumonia and acute bronchitis ; Malaria (simple and severe forms, especially in children present on the sites) ; Sexually transmitted infections, mainly gonorrhoea (gonorrhoea) and HIV infections. The chemical risks in the gold EPAS are dominated by exposure to mercury, cyanide and various other chemicals

SENEGAL

Background of Senegal (Source: Senegal ASGM National Action Plan Chapters 1-3)

54. Chapter 1 in the NAP of Senegal points to artisanal and small-scale gold mining as an important sector at the local and regional level due to considerable ecological, social and economic influence. The richness of this zone in gold resources has led to a strong migration of populations from at least 10 riparian countries with a high representation of Malians, Burkinabé and Guineans.

55. As part of the project to develop this NAP, a study was carried out on the gold ASGM in Senegal in 2018, including an inventory of mercury emissions in this sector. According to this study, about 3.9 t/year (3952.31 kg/year) of gold were produced by the EMAPE in Senegal, including 3 t/year (2983.65 kg/year) from the Kédougou region and 0.9 t/year (968.66 kg/year) from the Tambacounda region

56. In terms of employment, 31,359 people work in the gold ASGM in Senegal, 14,862 of whom are men (48%), 14,503 are women (46%) and 1,994 are children under the age of 15 (6%).

Institutional, political, and governance structure of Senegal

57. An analysis of the legal framework shows that mining in Senegal is governed by Law No. 2016-32 of 8

November 2016 on the Mining Code and its Decree No. 2017-459 of 20 March 2017 setting out the implementation modalities.

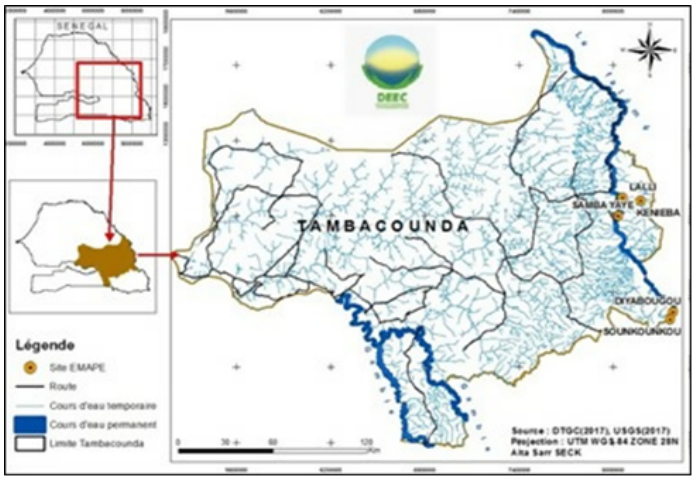
58. ASGM in Senegal is also governed by:

- Law No. 2016 - 10 of 5 April 2016 revising the Constitution of Senegal;
- Act No. 2001-01 of 15 January 2001 on the Environment Code and its implementing decree No. 2001-282 of 12 April 2001;
- Decree No. 2010-1281 of 16 September 2010 regulating the conditions of use of lead from used batteries and other sources and the use of mercury;
- Ministerial Order n° 009249/MEM/DMG of 14 June 2013 on the organisation of gold panning activities;
- Ministerial Order n° 02472/MIM/DMG of 10 February 2014 defining "gold panning corridors" for gold panning in the Tambacounda and Kédougou regions;
- Interministerial Order n° 09931/MIM/MEF/MCESI of 18 June 2014 setting the terms and conditions for opening and operating precious metal and gemstone trading desks;
- Order No. 14358 of 28 September 2016 setting the sampling plan, methods and permitted levels for mercury, lead, cadmium, arsenic and inorganic tin in fishery and aquaculture products.

59. The Environment Code provides for the regulation of harmful and dangerous chemical substances[5]. Mercury is classified as a hazardous substance and the provisions apply to it. A national commission for the management of chemical products[6] (CNGPC) whose composition is determined by order of the Minister in charge of the Environment has the[7] task of controlling and monitoring the import, use and movement of chemical, noxious and hazardous substances to be maintained.

Specific Actions on ASGM in Senegal:

Map of ASGM sites in Tambacounda (around 77% of the ASGM sites in the countries are located in this region)



60. Based on information from the project document, Senegal developed a National Strategic Plan for ASGM in 2010 with the financial support of the United Nations Organization for Industrial Development (UNIDO). This process was conducted in a participative way with the mobilization and participation of key stakeholders, through consultative workshops, a field data collection and surveys about ASGM sites in Senegal.

61. In 2014 a rapid appraisal and mercury inventory of the ASGM sector of Senegal was carried out as a part of a United Nations Industrial Development Organization/Global Environmental Facility/United States Department of State program on mercury reduction and formalization of the ASGM sector in West Africa, executed by the Artisanal Gold Council. During this time 80 structured interviews with miners, 120 household surveys, physical measurements, observations and numerous informal interviews were utilized in conjunction with a comparative data analysis in order to create a national inventory of the ASGM sector for Senegal, to explore the sector's socio-economic contribution to rural development in Senegal, and to provide a basis for discussing policy approaches needed to improve the sector.

62. ASGM in Senegal is mainly practiced in the Kedougou region, East Senegal. The activity has developed exponentially, supported by the lack of economic alternatives in rural areas and the gold price increase in the international market. In 2014 there were between 60-70,000 people depending directly of this activity in 77 sites; producing approximately 4.5 tonnes of gold per year and releasing upwards of 5.9 tonnes of mercury into the environment annually. ASGM is the primary source of revenue in the Kedougou region, more important and complementary to agriculture, and therefore an important support to the local economy in its struggle against poverty.

Trade and Economic Activity on ASGM in Senegal

63. In Senegal, the use of mercury to extract gold from ore is a practice found at the majority of mining sites. The use of mercury by gold miners is justified by its accessibility, ease of use, affordability and the speed of the amalgamation process. Illegal flows of mercury are linked to porous borders, lack of knowledge about mercury on the part of defence and security forces, and the absence of an effective control system and Community regulations. Mercury comes from some countries in the sub-region such as Mali, Guinea, Burkina Faso and Ghana. It also comes from within the country through structures authorized to import mercury and which divert some of it to gold mining sites in a fraudulent manner.

64. The gold miners buy mercury from gold buyers on the sites, supplied by street vendors who market the mercury in bulk and semi-bulk. Sometimes these street vendors sell the mercury to the gold panners at retail level at more competitive prices.

65. The value of gold production from gold panning activity in Senegal between April 2016 and April 2017 amounted to CFAF 86.6 billion (about $147.22 million), according to the report of the monographic study on gold panning in Senegal carried out by the National Agency for Statistics and Demography (ANSD, 2018)[9].

Environmental and Health Impacts of ASGM in Senegal

66. One of the most serious environmental problems caused by this sector in Senegal is the contamination of soil, sediment, water and air due to the use of mercury in the amalgam burning process and the release of mercury and mercury-containing discharges into the environment. Other environmental problems caused by the gold ASGM can be identified in the country, include the following: pollution from the use of other chemicals, e.g. cyanide; deforestation caused by clearing of vegetated areas and erosion; habitat loss and land degradation; water pollution by sediment and other chemicals; the drying up of watercourses through river dredging; and alteration of the water table due to excessive pumping.

67. Health problems include malaria, digestive disorders, general asthenia, headaches and respiratory

problems (EMAPE Public Health Strategy, 2018). Various factors related to the working conditions of the ASGM community affect their health, such as :the drudgery of physical work on traditional gold panning sites; the inaccessibility of the sites; exposure to dust; poor water quality; the lack of means of protection; the presence and proliferation of insects; open defecation due to insufficient latrines, and lack of hygiene, which causes diarrhoea, dysentery and stomach aches. This is coupled by the lack of awareness and prevention strategy by health professionals on the hazards of chemicals such as mercury and cyanide and poisoning.

Results Framework: Objectives and Components

68. The main objective of the project was to contribute to the implementation of the Minamata Convention through the reduction of the risks posed by the unsound use, management and releases of mercury in the ASGM sector. Mali and Senegal would benefit from new and updated information about the respective national mercury situation, use of mercury and past policy approaches that have been successes and failures in formalizing and improving the environmental performance of the ASGM sector in each country, and from increased capacity in managing the risks of mercury emitted and released from such activity. The sharing of experiences and lessons learned throughout the project with other countries working on their NAPs is also expected to be an important contribution to countries with similar socio-economic situation and foster cooperation for future implementation of the NAPs.

69. The project aimed to protect human health and the environment from the risks posed by the emissions and releases to the environment of mercury from artisanal and small-scale gold mining and processing in Mali and Senegal by developing NAPs in compliance with Annex C of the Minamata Convention. This included planning for a variety of policy and market-based tools to assist in supporting and developing the ASGM sector into a viable and sustainable economic activity, which is recognized by the Minamata Convention as an important component of NAPs for ASGM.

70. The project framework followed the guidance document on the development of a national strategic plan developed by the UNEP Global Mercury Partnership[8] and revised on the basis of experience in its usage. The guidance has been developed with the intention of addressing ASGM in a holistic manner and includes a review of legal, educational, economic, regulatory and enforcement frameworks, and provided guidance on developing budgets and workplans and identifying potential sources of funding and partners.

71. The project had two major components with the key outcome that Mali and Senegal developed and submitted NAPs in compliance with Annex C of the Minamata Convention to guide their future action in reducing mercury emissions and releases from, artisanal and small-scale gold mining and processing. Each component has outputs and activities that contributed to project outcome.

Component 1: Global Technical Support for NAP Development

Expected Output and activities:

[8] Guidance Document: Developing a National Strategic Plan to Reduce Mercury Use in Artisanal and Small-Scale Gold Mining, available at http://www.mercuryconvention.org/Portals/11/documents/meetings/inc7/English/7_17_e_ASGM.pdf.

1.1 Training and guidance provided to relevant national stakeholders in Mali and Senegal to develop and implement a NAP as per Annex C of the Minamata Convention.

1.1.1 Organization of regional inception and training workshop;

1.1.2 Development of a roster of experts and collection of tools and methodologies for NAP development;

1.1.3 Capacity building trainings including ASGM and mercury inventory baselining and monitoring;

1.1.4 Knowledge management and information exchange through the Global Mercury Partnership website and/or Partners websites and tools;

1.1.5 Final regional workshop to identify lessons learned and opportunities for future cooperation in the NAP implementation. A gender session will be included in the workshop agenda.

1.2 Draft NAP developed as per Annex C of the Minamata Convention.

1.2.1 National Inception workshops to (i) develop ToRs for the National Coordination Mechanism and Stakeholder Advisory Group; (ii) agree on the budget allocation and workplan for the project; and finally (iii) develop an awareness raising strategy on mercury use in ASGM and its environmental and health impacts to be implemented throughout the whole project;

1.2.2 Development of the national overview of the ASGM sector according to the NAP guidance by local teams;

1.2.3 Organize national workshops to develop the draft NAP and a roadmap for NAP endorsement and submission to the Minamata Secretariat.

Component 2: Endorsement and submission of the National Action Plans to the Minamata Secretariat

Expected Outputs and activities:

2.1 Technical support provided to participating countries to facilitate the NAP endorsement and submission to the Minamata Secretariat.

2.1.1 Design and conduct of national workshops targeting vulnerable groups and miners to complete the final NAPs and to expose the formulated NAPs on ASGM to public consultation and endorsement;

2.1.2 Design and conduct of national workshops targeting appropriate national decision makers that are decisive to NAP endorsement and official submission to the Minamata Secretariat

Milestones/Key Dates in Project Design and Implementation

72. Project GEF CEO endorsement: July 2016

73. Actual start on 4 November 2016 was due to delays in administrative processes in both the implementing agency and the executing agency. In addition, the national governments - Ministry of Environment, Sanitation and Sustainable Development (MEADD) of Mali, the Ministry of Environment and Sustainable Development (MEDD) of Senegal as co-executing agencies had to do internal institutional arrangements to start the project.

74. 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 quarterly financial reports and 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 March 2018, allowing the contract to remain in force until March 2020.
Project completion date: Planned for October 2018, Estimated completion date: March 2020

Implementation Arrangements

75. 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. The Artisanal Gold Council (AGC) was the executing agency and the co-executing partners were Ministry of Environment, Sanitation and Sustainable Development (MEADD) of Mali, and the Ministry of Environment and Sustainable Development (MEDD) of Senegal. AGC has track record in delivering projects on the management of mercury and on ASGM in particular and participated in the development of the Guidance for ASGM NAPs under the Global Mercury Partnership. Bi-annual progress and quarterly financial reports have been submitted by the AGC to the UNEP/GEF task manager. The project agreement requires a financial audit 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 the end of Q2 2020	Expenditure ratio (actual/revised)
Component 1	$781,592	$781,496	$767,097	0.98
Component 2	$92,500	$92,596	$130,292	1.4
Project Management	$90,908	$90,908	$80,475	0.89
M&E	$35,000	$30,000	$3,840	0.13
Total	$1,000,000	$1,000,000	$981,704	0.98

The balance of 18, 248 USD would be used for the terminal evaluation fees.

Project partners

76. The key project partners were:

- UN Environment Programme (UNEP) as the implementing agency
- Artisanal Gold Council as the executing agency
- The Ministry of Environment, Sanitation and Sustainable Development (MEADD) of Mali and the Ministry of Environment and Sustainable Development (MEDD) of Senegal as a co-executing national partners
- The GEF as a financing partner
- The Minamata Convention secretariat; joint BRS secretariats
- The Global Mercury Partnership

77. Project stakeholders (Ministries, Departments, Agencies, industry, mining associations, civil society) are well defined in the ProDoc and ASGM NAPs and will be elaborated in the later part of this review.

Changes in Design during Implementation

78. The project was extended based on the request received in March 2018 from the executing agency and the co-executing national partners. A revision to the work plan also accompanied the project extension, and it consisted of planning for completion of activities in Mali and for the conduct of regional and national lesson learnt workshops and to allow completion of the writing and document the NAPs.

IV: Theory of Change of the Project

79. Based on the project document, the Theory of Change was reconstructed. The evaluator carried out the reconstruction using the GEF Evaluation Office Review of Outcomes to Impacts methodology. There are three stages to this method: 1) the first stage is identifying the intended impacts of the project, consisting of the project objective and the global environmental benefits (GEB); 2) the second stage is reviewing the project proposal including outcomes, outputs, activities, milestones and assumptions; 3) and the last stage is analysing the outcomes to impacts pathways.

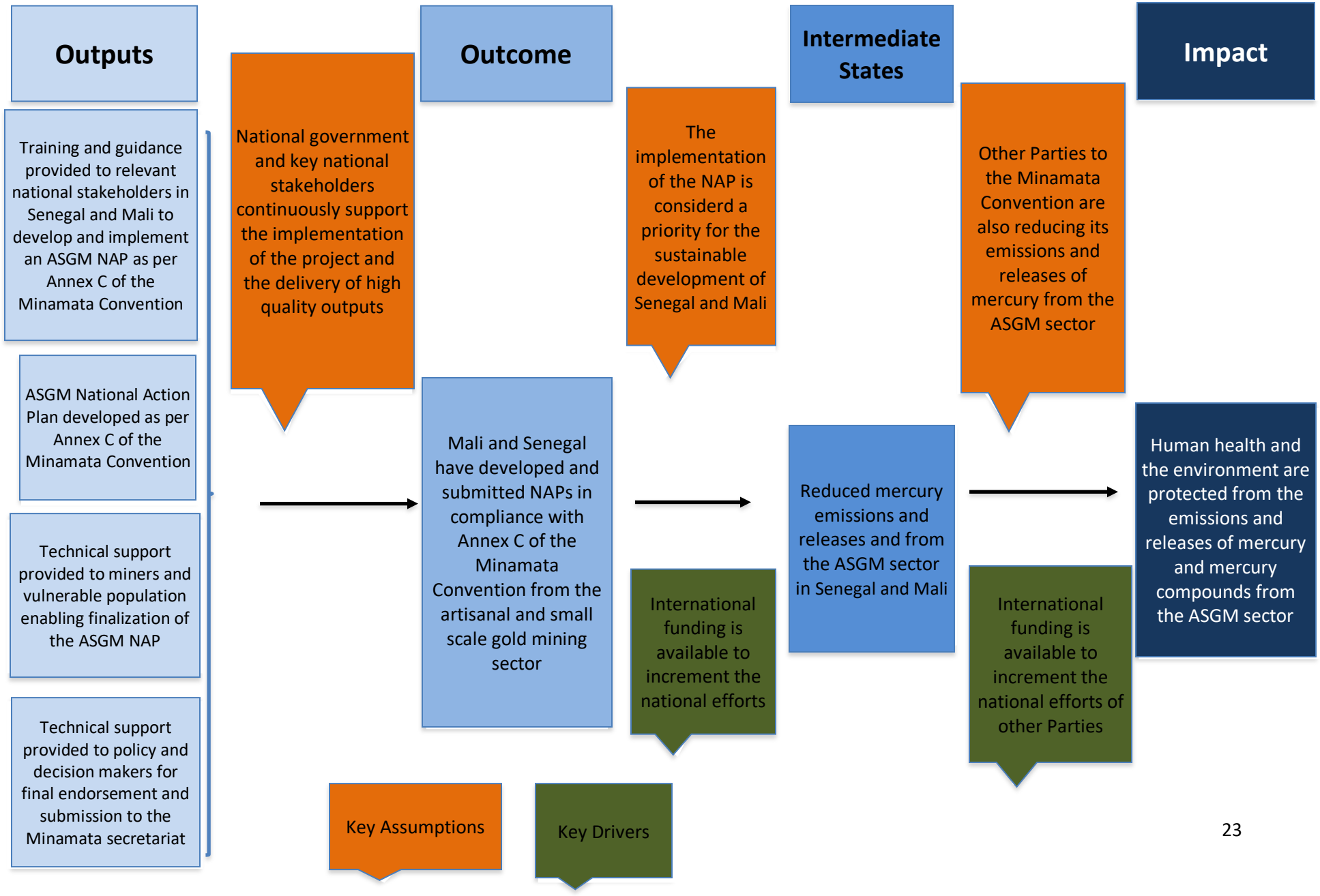
80. The below diagram has been constructed based on the project proposal, which includes a situation analysis, a cause to ends diagram and single generic causal pathway.

81. In the diagram below, the emphasis was placed on impact pathways; linking the project outputs to one key outcome. The assumptions made at the design stage are also identified and linked to the various stages in the theory of change. These assumptions are essential for the likelihood of realisation of the intended impacts. Due to the enabling nature of this project of the ASGM NAP, there is one major pathway of outcomes to impact identified, along with one intermediate state.

82. Impact pathway 1. The fulfilment of the project objective requires the success of the project outcome which is linked to the next in a causal/continuous sequential logic: In order for Mali and Senegal to comply with article 7 on ASGM, it must first assess and enhance its existing information and capacities on ASGM , then it must have a complete understanding and baseline assessment of its institutional, regulatory/legal and mercury management capacities also drawing on its MIA. Project outputs include "the provision of training and guidance to the national stakeholders of both countries enabling them to draft their ASGM NAPs". Another output is "provision of technical support to miners and the vulnerable population enabling them to finalize the ASGM NAP"; "support to national decision makers enabling them to endorse and submit the finalized ASGM NAP to the Minamata Convention". All these

outputs contribute to the project's key outcome which is that Mali and Senegal have developed and submitted NAPs in compliance with Annex C of the Minamata Convention to guide their future action in reducing mercury emissions and releases from, artisanal and small-scale gold mining and processing. ". Consequentially, at this stage, the project has reached the intermediate state which is "reduced mercury emissions and releases and from the ASGM sector in Senegal and Mali, contributing to global environment benefits of reduced mercury emissions and releases and decrease in mercury related diseases and environmental degradation". Ultimately, this intermediate state will contribute to the project impact of "human health and the environment are protected from the anthropogenic emissions and releases of mercury and mercury compounds from the ASGM sector". A key assumption is that the implementation of the ASGM NAP in Mali and Senegal is considered a priority in their sustainable development goals. A key driver is the availability of international funding to increment national efforts.

Theory of Change (Reconstructed)



V. Review Findings

83. 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 as objectively as possible, then will provide a rating for each review criterion.

A. Strategic Relevance

UNEP's Mandate and Programme of Work

84. The project was very much aligned with UNEP's Medium-Term Strategy, and Programme of Work (POW) 2014-17 under the Chemicals and Waste (CW) Subprogramme. The ASGM NAPs in Mali and Senegal contributes to UNEP's expected accomplishment A on the sound management of chemicals and waste. In line with the strategy, the project increases the capacity of the Mali and Senegal to manage chemicals and waste especially in the ASGM sector 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

85. 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 Minamata Convention 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 and compliance to Article 7 on ASGM. 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 legal, social, economic and developmental policies and strategies to be developed.

National and Regional Priorities

86. The project was very much aligned with the UN Development Assistance Framework (UNDAF) -now known as UN Sustainable Development Cooperation Framework- environmental priorities/outcomes in both countries. The UNDAF in Mali for the period 2015-2019[9] was articulated around 4 axes: Peace and Security; Governance; Access to Basic Social Services; Economy and Environment.

87. Mali ratified the Minamata Convention on 27 May 2016. In 01 Mars 2016 Mali notified the Minamata Secretariat that mercury emissions from the ASGM are more than insignificant in the country. The project

[9] https://minusma.unmissions.org/sites/default/files/minusma_hebdo_n38.pdf

was significant for Mali to meet its obligations to the Minamata Convention in particular article 7 on ASGM.

88. The UNDAF in Senegal for the period 2012 – 2016 was articulated around 9 axes which can be summarized as similar to those in Mali: Peace and Security; Governance; Access to Basic Social Services; Economy and Environment.

89. The project would contribute to the UNDAF strategy in both Mali and Senegal by:
    a. Assessing the role ASGM can play in the process of peace and security in the country;
    b. Fostering the respect of human rights with strong involvement of the civil society in the ASGM sector;
    c. Enabling a better health care for population vulnerable to the mercury uses and releases from the ASGM sector;
    d. Contribute to the country's efforts towards sustainable development.

90. Senegal ratified the Convention on 3 March 2016. In 31 December 2015 Senegal notified the Minamata Secretariat that mercury emissions from the ASGM are more than insignificant in the country. The project is significant for Senegal to meet its obligations to the Minamata Convention in particular article 7 on ASGM.

91. In addition, the project document stated the relevance of the project in meeting sustainable development goals (SDGs) 2 (healthy lives), 5 (gender and equality), 6 ((water and sanitation), 8 (economic growth and employment) and 12 (sustainable consumption and production)

92. The project is therefore highly relevant to global, regional, and national priorities. It contributes to meeting the SDGs and 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 as well as the countries' UNDAF priorities. In addition, both countries have ratified the Minamata Convention and the project will enable them to comply to Minamata obligations, in particular article 7 on ASGM. As an enabling activity, the project benefited from a design that focused on assessment and provision of baseline data on artisanal small-scale mining in order for the country to have an ASGM national action plan. This design differs from other mercury or ASGM projects.

Rating for strategic relevance: Highly satisfactory.

B. Quality of Project Design

93. As per the inception report: The project design is satisfactory overall and takes into consideration the current state of environmental frameworks, institutional capacity and national priorities. The project document (ProDoc) states that the project will contribute towards the countries' UNDAF goals and is consistent with regional and national priorities, given that both countries have already ratified the Minamata Convention and that national focal points have informed the Minamata Convention secretariat that mercury used in the ASGM sector is more than significant.

94. The project was aimed at facilitating the use of scientific and technical knowledge and tools by national stakeholders in Mali and Senegal to develop the ASGM National Action Plans. The future implementation of the ASGM National Action Plans will contribute to reduce the use of mercury and mercury compounds in, and the emissions and releases to the environment of mercury from, artisanal and small-scale gold mining and

processing in the participating countries To accomplish this objective, a resilient and well-thought project design to trigger change that will affect how the Mali and Senegal manages chemicals, in particular mercury and its waste in the ASGM sector.

95. The strengths of the project design include the strategic relevance, stakeholder analysis, background on mercury and ASGM activities and previous projects, 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 narrative form.

96. Stakeholder analysis was robust where all relevant government agencies, civil society and mining communities to be engaged was identified. This facilitated a sense of national ownership of the project. Moreover, the very active national coordinators were all motivated and driven to deliver the outcomes. Among the stakeholders identified in the ProDoc are relevant Ministries and government agencies and civil society organizations. The relevant Ministries (Environment, Health, Mines, Finance and Economic Development, Labour, Justice, Trade and Commerce), miners, indigenous groups, private sector/large mining representatives, academe, civil society such as health and environment groups were identified together with their roles.

97. The project would also consider any previous efforts to collect information related to mercury uses and releases in the ASGM sectors in Mali and Senegal. The project would also take into account the expertise gathered by other countries in previous projects, and in turn, share the experiences and lessons learned with those countries that are at an early stage of NAP development. The project will coordinate closely with UNEP Chemicals Branch and with the different mercury programmes and projects in place. The integration of outcomes and deliverables of this project is also expected to provide significant input to the existing national framework for chemicals management in Mali and Senegal. Thus, enhanced capacities and knowledge on the uses and releases of mercury at the ASGM sector will facilitate the development and/or update of current policies and enforcement practices in a more efficient approach.

98. Gender was factored in the project design especially in many ASGM areas on the biological risk of women where women perform tasks such as pouring the mercury into the ball-mills or mixing the mercury in panning, and burning the amalgam, often with their children or infants nearby. The project would ensure that there are opportunities for women to contribute to, and benefit from, the project outcomes. The ProDoc states that the EA will work with national coordinators to ensure women are well represented on national coordinating committees, and that consultation with at-risk communities' targets both women and men. The project coordinators would also ensure that always when possible, data collected in the framework of this project would be disaggregated by sex and age. The NAP for the ASGM sector would fully incorporate the gender dimensions identified in the national overview of the ASGM sector and foster gender equality. Furthermore, the ProDoc states that the project will advocate for a national regulatory framework targeting the protection of these vulnerable groups. Through these vulnerable groups, the project will also sensitize the general population about the risks of mercury.

99. 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 is partially mainstreamed :** Gender is reflected in the context, implementation, and logframe.

100. The ProDoc did not highlight relevant national chemicals and waste legislation as well as international treaties/ multilateral environmental agreements where Mali and Senegal could be a party. The ProDoc also missed to mention the MIAs that were delivered and the potential links to the ASGM NAPs. Except for mercury consumption and emissions in the ASGM sector, there is a lack of baseline data for other relevant indicators.

101. The ProDoc made no mention of the links to human rights and its effect on indigenous people as well as the socio-economic benefits. However, The ASGM NAPs of both Mali and Senegal however has chapters on the formalization strategy, that is a human rights- based approach focusing on the marginalized and the vulnerable population such as women and children. Both ASGM NAPs also have targets and strategies that includes socio-economic benefits, or poverty reduction in both countries.

Rating for project design: Satisfactory

C. *Nature of External Context*

102. In terms of consideration for external factors that might affect the project, there was no mention of likelihood of conflict, such as internal armed conflict or change of government that could affect project delivery. The ProDoc indicated high level commitment from government institutions so the risk was low. Due to the short timeframe and nature of the project, it is understandable that the likelihood of natural disasters was not be detailed.

Rating of nature of external context: Favourable

D. *Effectiveness*

Achievement of outputs

103. Table 2: The core outputs of the project by component contributing to the project key outcome: Mali and Senegal developed and submitted NAPs in compliance with Annex C of the Minamata Convention to guide their future action in reducing mercury emissions and releases from, artisanal and small-scale gold mining and processing.

Component	Output
Component 1: Global Technical Support for NAP Development	1.1. Training and guidance provided to relevant national stakeholders in Mali and Senegal to develop and implement a NAP as per Annex C of the Minamata Convention.
	1.2 Draft NAP developed as per Annex C of the Minamata Convention
Component 2: Endorsement and submission of the National Action Plans to the Minamata Secretariat	2.1 Technical support provided to participating countries to facilitate the NAP endorsement and submission to the Minamata Secretariat

104. Review of the project documentation, the deliverables and consultation with the available stakeholders

confirmed that the outputs delivered are of sufficient quality and will be useful to stakeholders overall.

Output 1.1 Training and guidance provided to relevant national stakeholders in Mali and Senegal to develop and implement a NAP as per Annex C of the Minamata Convention

105. All activities that delivered on this first output were done including:
- Regional and national inception workshops were conducted
- The EA and the project global component provided a roster of experts and tools on the NAP development. These guides include "Quick Start Guide for managing mercury trade in artisanal and small-scale gold mining Handbook" and "Developing National ASGM Formalization Strategies within National Action Plans". Additional materials include a video on eliminating worst practices in ASGM, ASGM baseline estimates toolkit, mobile data collection tool, socio-economic research methodology
- Capacity building trainings and assistance with baseline inventories through webinars and the use of the MapX platform, as well as a field based training and practicum
- Knowledge management and information exchange through the Global Mercury Partnership (GMP) website and/or Partners websites and tools; a NAP starter toolkit was developed and a mailing list of GMP Africa was established
- Final regional workshop to identify lessons learned and opportunities for future cooperation in the NAP implementation

Output 1.2 Draft NAP developed as per Annex C of the Minamata Convention.

106. Activities that delivered on this output include:
- National Inception workshops were conducted to (i) develop ToRs for the National Coordination Mechanism and Stakeholder Advisory Group; (ii) agree on the budget allocation and workplan for the project; and finally (iii) develop an awareness raising strategy on mercury use in ASGM and its environmental and health impacts to be implemented throughout the whole project;
- National overview of the ASGM sector according to the NAP guidance were developed by local teams;
- National workshops were organized in Senegal and Mali to develop the draft NAP and a roadmap for NAP endorsement and submission to the Minamata Secretariat.

107. The national coordination mechanisms in each country were strengthened. A Stakeholder Advisory Group (SAG) was also established with members of civil society with experience and knowledge in the national mercury uses and releases, particularly from the ASGM sector. The NCM engaged with the SAG in actual project execution. On-line surveys revealed that members were highly satisfied with their participation in the NCM. Stakeholder interviews and outcomes from the on-line survey confirm that overall the committee served its purpose and provided sufficient participation.

Output 2.1 Technical support provided to participating countries to facilitate the NAP endorsement and submission to the Minamata Secretariat.

108. Activities that delivered on this output include:
- National workshops targeting vulnerable groups and miners were conducted to complete the final NAPs and to expose the formulated NAPs on ASGM to public consultation and endorsement;
- National workshops were conducted targeting appropriate national decision makers that are decisive to NAP endorsement and official submission to the Minamata Secretariat

ASGM National Action Plan

109. The ASGM NAPs in Mali and Senegal is the core deliverable in this project which is highly satisfactory. It has the relevant chapters on country national situation including the countries' legislative framework, ASGM overview and mercury use, reduction targets and clear national implementation strategy that includes :measures for formalization or regulation, strategy to reduce mercury use, emissions and releases, stakeholder engagement, protection of the vulnerable population such as women and children, managing trade and diversion, public health strategy and financial strategy. This output has undergone several review processes and therefore its completion and timely delivery are the only factors that can be rated by the evaluator for this terminal review.

110. The project delivered successfully on project outputs that led to the project outcome. Success factors are the preparedness and quality of project design, the high stakeholder engagement, the close working relationship between the EA and the national project coordinators, and the good quality of project management with technical backstopping from both the AGC as the EA and UNEP as implementing agency.

Achievement of Outcomes

111. The successful delivery of outputs per project component led to the delivery of outcome as per table 2 above. Due to the enabling nature of this project of the ASGM NAP, there is one major pathway of outcomes to impact identified, along with one intermediate state.

112. As per the theory of change reconstructed for the purposes of this evaluation, there is one Impact pathway .The fulfilment of the project objective requires the success of the project outcome which is linked to the next in a causal/continuous sequential logic: In order for Mali and Senegal to comply with article 7 on ASGM, it must first assess and enhance its existing information and capacities on ASGM , then it must have a complete understanding and baseline assessment of its institutional, regulatory/legal and mercury management capacities also drawing on its MIA. Project outputs include "the provision of training and guidance to the national stakeholders of both countries enabling them to draft their ASGM NAPs". Another output is "provision of technical support to miners and the vulnerable population enabling them to finalize the ASGM NAP"; "support to national decision makers enabling them to endorse and submit the finalized ASGM NAP to the Minamata Convention". All these outputs contribute to the project's key outcome which is that "Senegal and Mali developed and submitted NAPs in compliance with Annex C of the Minamata Convention to guide their future action in reducing mercury emissions and released from ASGM , thus contribute to the protection of human health and the environment from the emissions and releases of mercury from the artisanal and small- scale gold mining sector". Consequentially, at this stage, the project has reached the intermediate state which is "reduced mercury emissions and releases and from the ASGM sector in Senegal and Mali, contributing to global environment benefits of reduced mercury emissions and releases and decrease in mercury related diseases and environmental degradation". Ultimately, this intermediate state will contribute to the project impact of "human health and the environment are protected from the anthropogenic emissions and releases of mercury and mercury compounds from the ASGM sector". A key assumption is that the implementation of the ASGM NAP in Mali and Senegal is considered a priority in their sustainable development goals. A key driver is the availability of international funding to increment national efforts.

113. Gender is very much mainstreamed in both the project design and the ASGM NAPs. Both NAPs included a discussion of different gender roles in ASGM. Female and family-based interest groups were identified in the NAPs who were also consulted during the formulation of the NAPs. Both NAPs included a set of strategies unique to women and children with specific communications and national planning documents focusing on the needs of women are developed. Both NAPs recommend that women's groups be involved in the monitoring and evaluation of outcomes to ensure that monitoring data is collected in a sex disaggregated manner and outcomes are assessed through a gender lens. Both NAPs present the workforce in a sex disaggregated manner.

114. Achievement of outcomes could be attributed directly to the project which is "enabling" in nature, to the good quality of project design, management and supervision by the IA and EA, stakeholders' participation, communication and public awareness. Gender and the human rights-based approach in the formalization strategy was highlighted in the NAPs that includes action to eliminate worst practices and a public health strategy.

115. It can be concluded that the project has fulfilled both outputs and outcome and is therefore at the intermediate stage. The project will help in the Mali and Senegal's 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

116. 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 especially in the ASGM sector; awareness raising among stakeholders and policymakers about 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 outcome discussed and highlighted in the above section.

117. One unintended positive result was the awareness raised on the interlinkages between ASGM trade and potential diversion as well as health impacts of mercury exposure among the various Ministries and stakeholders. Another positive unintended impact is the public health strategy on ASGM that could be replicated in other ASGM NAP projects. No unintended negative impacts have been observed by the evaluator or by the stakeholders consulted.

118. In terms of catalyzed change, and because of the nature and scale of the project, it is not expected that it will produce any behavioral changes yet. It is expected that stakeholders will utilize all the data gathered in this project when implementing the implementation plan elaborated in the ASGM NAPs. 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 from ASGM 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.

Attainment of Objectives and Planned Results

119. The project findings and deliverables, in the form of the full ASGM NAPs and its executive summary, were

made available to all relevant Ministries, Departments and Agencies in the Mali and Senegal, as well as the Stakeholder Advisory Group. The national validation workshop that took place facilitated buy-in and support of the respective Mali and Senegal NAPs.

Compliance of Assumptions:

120. The Logical Framework of the project states that the following assumptions were made at the design stage:

121. *"National government and key national stakeholders continuously support the implementation of the project and the delivery of high-quality outputs"*

122. According to project documentation and stakeholder feedback, this assumption holds. Although Mali had a number of political, administrative, financial and personnel related challenges in project execution, Mali was able to deliver its NAP with the assistance of the EA.

123. "*The implementation of the NAP is considered a priority for the sustainable development of Senegal and Mali"*

124. -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. Mali and Senegal consider the SDGs as a priority and this project contributes to reaching SDG goals.

125. "*Other Parties to the Minamata Convention are also reducing its emissions and releases of mercury from the ASGM sector"*

126. As of this evaluation, several Parties to the Minamata Convention have or are drafting their ASGM NAPs which as a composite will contribute to the impact of protecting human health and the environment from the adverse effects of mercury.

Rating for effectiveness: Satisfactory

E. Efficiency

127. The project was able to achieve its projected outputs despite the challenges encountered: Mali had administrative challenges in terms of internal coordination and communication, management of contractors, change of leadership, as well as deficits in the technical and reporting capacities of some of the national experts. Senegal had a change in the leadership of the Ministry of Environment and input provided by the miners were of poor quality. These events led to the delay in the conduct of the workshops and overall project delivery. However, the AGC as the EA made contingency plans to address the issues especially in Mali where there was a gap in the project co- executing partner and the subcontractors. The AGC stepped in using project and its own resources in order to provide project continuity such as by providing its own staff to conduct activities at national level and by training again the miners in Senegal. The AGC also developed its own guidance on health institutional capacity assessment, rapid health situation assessment and public health strategy that were not available in the ASGM NAP guidance.

128. It was challenging for the evaluator to contact all tertiary stakeholders, such as academic institutions and NGOs due to travel and fund limitations. However, all national co-executing partners interviewed have

agreed that their relationship with the executing agency, the AGC, was instrumental to project completion. AGC has a roster of experts whom it can deploy to countries and train on the inventories and has internal capacity to review NAP reports and deliver quality results. The Global Mercury Partnership as part of component 1 also delivered knowledge materials that were useful in delivering the outputs. Stakeholder participation was also robust, based on responses from the on-line survey.

129. The project was cost effective, which up to the time the terminal review was drafted, utilized 98 % of the project total budget. The extension was a no-cost extension due to challenges in timing of project delivery but had no considerable impact on project efficiency or delivery.

Rating for efficiency: Satisfactory.

F. Financial Management

130. The complete and regular quarterly financial reports provide sufficient detail into how well the executing agency managed funds. There was constant communication between the financial and project management staff. There is a remaining unspent balance 18,248 USD to be used for the terminal evaluation fees. A financial audit by an independent auditing agency is required. The final financial report is attached as Annex B.

131. 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

132. The monitoring and reporting mechanism consisted of bi-annual progress reports submitted by the AGC 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 (AGC) and its co-executing agencies in Mali and Senegal.

133. All progress and financial reports to date are detailed, complete and accurate in relation to the project targets and indicators. The EA provided thorough and comprehensive progress reports, detailing accomplishments, challenges, forecasts, and contingency plans including information on sex-disaggregated data. 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 with regular reporting from UNEP as implementing agency to the GEF as project donor.

Rating for monitoring and reporting: Highly Satisfactory.

H. Sustainability

134. 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 administrative challenges in both Mali and Senegal, both countries have the political will to implement its ASGM implementation plan and priorities. 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 countries efforts to fully implement their respective ASGM NAPs, 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 the countries to comply with article 7 (ASGM) of the Minamata Convention.

135. The implementation of the ASGM NAP and action in carrying out the priority activities will depend on National Coordination 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 ASGM NAP project results. Senegal has sustained its National Coordination Mechanism by establishing Comité de Mise en Oeuvre du Plan d'Action National (National Action Plan Implementation Committee) that will continue awareness raising activities and show the links between the NAP and development goals and potentially raising funds to support the plan. The civil society group- called the Stakeholder Advisory Group as of this writing is still active and could be potentially sustained. Gender concerns that have been mainstreamed in the NAPs could be potentially sustained in both countries.

136. Mali and Senegal have adopted a regional approach to the problem of mercury. Both have committed to work with each other and through regional approach such as through the Economic Commission for West Asia States (ECOWAS) to address mercury trade and harmonise gold trading regulations at the regional level. This should help incentivize formal/legal gold trade, help crack down on transborder mercury movement, and address the transnational challenges to a "national" action plan.

137. The involvement of financial institutions and intergovernmental organizations is important for the sustainability of the project and of the implementation the ASGM NAPs. Mali and Senegal need to build partnerships with bilateral and multilateral organizations for grants or loans for financial sustainability.

Rating for sustainability: Moderately likely

I. Factors and processes affecting project performance

Preparation and readiness

138. The project experienced delays due to the need to build capacities- technical operational and administrative- at country level and to address administrative challenges in both countries. 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 March 2018 in order to complete activities and related reporting in Mali. Despite the delays, the project was managed efficiently and effectively, with reported regular communication between the AGC and UNEP. The national co-executing partners provided positive feedback about the quality and quantity of communication.

Rating for project implementation and management: Satisfactory.

Quality of project implementation and execution

139. Both the IA (UNEP) and EA (AGC) had satisfactory performance in the project. The IA provided continuous follow up and backstopping to the EA and engaged the Global Mercury Partnership in Component 1. The EA provided leadership and was very supportive of Mali and Senegal's national coordinators and stakeholders on the ground. The EA was in constant follow up with the national project coordinators and was able to manage the risks brought about by administrative challenges. In Mali, the EA used project and its own resources to fill in the gap, executing the project on the ground.

140. Due to delays in project execution, the IA approved the project extension of the EA which responded to delays caused by the administrative challenges (change in staff and personnel) in both Mali and Senegal.

Stakeholder participation, cooperation and partnerships

141. The degree of effectiveness of collaboration between stakeholders is satisfactory drawing on a very robust stakeholder analysis from the start of the project. The Project Document (ProDoc) listed all relevant stakeholders who were engaged in project execution. Due to travel limitations and the challenges in reaching all stakeholders in both countries, interviews and an on-line survey developed by the evaluator was used to gauge stakeholder participation. On the basis of survey outcomes, the evaluator interviewed Mali and Senegal national project coordinators and validated outcomes of the survey. 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 ASGM NAPs. Overall, all respondents felt sufficiently involved in the implementation. Throughout the project, stakeholders felt they had an active role in actual execution and were actively engaged in the committee meetings and its decision-making process.

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

Responsiveness to Human Rights and Gender Equity

142. The project strongly considers gender equity in the ASGM NAPs. Both NAPS point to the role of women in the National Coordination Mechanism, and in ASGM where women are considered a vulnerable population. Both NAPs included a discussion of different gender roles in ASGM. Female and family-based interest groups were identified in the NAPs. Both NAPs included a set of strategies unique to women and children. Both NAPs recommend that women's groups be involved in the monitoring and evaluation of outcomes to ensure that monitoring data is collected in a sex disaggregated manner and outcomes are assessed through a gender perspective. Collection of sex disaggregated data was a challenge due to culture sensitive gender-based norms. Future projects could benefit by having a female member of the team and conducting awareness raising activities on gender.

143. The formalization strategy which is considered part of the ASGM NAP used the human rights-based approach focusing on the marginalized and vulnerable population and considers the roles of ASGM actors and the government.

Rating for responsiveness to human rights and gender equity: Satisfactory

Country ownership and driven-ness

144. Mali and Senegal display a sufficient level of country ownership, engaging practically all relevant government agencies in the process of producing the ASGM NAPs based on responses to the surveys conducted. This ownership is reflected in the survey responses that point to ownership representing the needs and interests of gender and marginalized groups such as the miners.

145. However, given the ambitious ASGM NAPs, the countries may not be able to deliver on the ASGM NAP without the proper financing mechanism and support of international organizations. Mali and Senegal would benefit from sharing of data and experiences in the subregion (West Africa) to obtain information on financial sustainability. Both Mali and Senegal also need to build bilateral and multilateral relationships with the donor community in order to implement their ASGM NAPs.

Rating for country ownership and driven-ness: Satisfactory.

Communication and public awareness

146. The EA approached project awareness raising in 2 ways:
The first approach was awareness raising about the project itself and encouraging stakeholders to participate in the NAP process. This was achieved via workshops (inception, formulation, regional and miner specific), pamphlet produced by Senegal, press event involving the Senegal Minister of the Environment visiting a mercury-free gold production facility as a way to promote the NAP and press coverage for several ASGM major project milestones. In addition, Senegal has just finished producing a video on mercury use and its risks and b) Awareness raising about mercury, exposure pathways and toxic risks.

147. The second approach was awareness raising about mercury risks and exposure pathways through workshops; health teams in both countries conducting informal mercury awareness workshops with miners during their field exercises; organization by Senegal of a peer to peer (miner to miner). The NAP strategies for implementation have several actions designed to raise awareness about mercury.

Rating for communication and public awareness: Satisfactory.

Rating for factors affecting performance: Satisfactory.

VI. Conclusions, Lessons Learned and Recommendations

i. Conclusions

148. Without the ASGM NAP project, it would be challenging for Mali and Senegal to comply with article 7 (ASGM) of the Minamata Convention. The ASGM NAP project enabled Mali and Senegal to collect baseline information relevant to ASGM in both countries on which they based their national targets and reduction objectives. The implementation strategy is comprehensive that includes strategies to reduce mercury emissions, releases, and exposure; actions to eliminate worst practices; facilitation of formalization and regulation; managing mercury trade and prevention of diversion; stakeholder engagement; public health strategy; and financial strategy to encourage mercury-free gold production. The ASGM NAPs therefore serve as the countries' roadmap to comply with Minamata Convention article 7 (ASGM), protecting human health and the environment from the anthropogenic effects of mercury-. Using the necessary scientific and technical knowledge and tools, the project delivered complete ASGM NAP implementation plan that allows mercury to be mainstreamed in the country's priorities. Drawing on the earlier Minamata Initial Assessments in both countries, the ASGM NAPs provided additional awareness on mercury and its compounds at the national level. The ASGM NAPs underwent sufficient review by national stakeholders and national/local consultants as well as global technical experts in a cost-effective manner.

149. 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 on chemicals and waste. **Relevance** to national priorities and needs was highlighted especially in the ASGM sector. It highlighted the links to the country's priorities as embodied in the both Mali and Senegal's UN Development Assistance Framework (UNDAF) and in meeting the relevant sustainable development goals. The project document provided very good background on Mali and Senegal's mercury activities and the ASGM sector and existing coordination mechanisms.

150. The **strengths** of the design include the strategic relevance, stakeholder analysis, background on mercury and ASGM activities in previous projects, 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 narrative form. 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. Gender roles and equity was mainstreamed. The project document states that the approach to formalization is a human rights approach, focusing on the protection of the marginalized and vulnerable population. Socio-economic factors were also considered. The project design did not mention recognizable risk in project execution, thus, the nature of external context was favorable.

151. The project was **effective and efficient in delivering the outputs and desired outcome** despite the challenges in Mali and Senegal. Mali had administrative challenges in terms of internal coordination and communication, management of contractors, as well as deficits in the technical and reporting capacities of some of the national experts. Senegal had a change in the leadership of the Ministry of Environment and input provided by the miners were of poor quality. These events led to the delay in the conduct of the workshops and overall project delivery. However, the Artisanal Gold Council as the EA made contingency plans to address the issues especially in Mali where there was a gap in the project co-executing partner and the subcontractors. The AGC stepped in using project and its own resources in order to provide project continuity such as by providing its own staff to conduct activities at national level and by training again the miners in Senegal. The AGC also developed its own guidance on health institutional capacity assessment, rapid health situation assessment and public health strategy that were not available in the ASGM NAP guidance. A project revision was done in terms of extending the project timeline to allow more time for AGC to fill in the gaps in Mali's administrative vacuum, to conduct national consultations/validation workshops and for the EA to finalize and improve on the reports on the ASGM NAPs.

152. Due to administrative delays, project extension was requested which was granted by the IA to EA. A more realistic timeframe would benefit future projects.

153. Achievement of outcomes could be attributed directly to the project which is "enabling" in nature, to the good quality of project design, stakeholders' participation, communication and public awareness, project management and supervision, monitoring and reporting and financial management. Responsiveness to human rights and gender equity was highlighted in the ASGM NAP. Furthermore, the ASGM global component through the Global Mercury Partnership also provided knowledge materials as valuable input into the final outcome.

154. The project ensured sustainability by training local consultants on how to do mercury assessments in the ASGM sector. 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 on mercury trade and to ensure financial sustainability such as by engaging the private sector. Mali and Senegal may need to establish relationships with bilateral and multilateral donors for potential funding of their NAP implementation.

155. The project's **strengths** have been the quality of project design, preparation and readiness, stakeholder participation, cooperation and partnerships, smooth collaboration among the government agencies and stakeholders (especially the mining community) in Mali that delivered on the NAP. There was also regular communication between the executing agency (AGC) and the co-executing partners as well as with the implementing agency (UNEP) addressing issues and concerns during implementation. The selection of the appropriate project national coordinator for the NAP in Senegal is also considered a strength of the project.

156. This close working relationship among stakeholders in Mali and Senegal is currently sustained by "Working Groups" that includes government agencies, local government authorities, civil society, academe, local mining communities. This group continues to communicate and meet regularly. The robust stakeholder analysis at the design phase was thorough and is highly satisfactory, as it includes relevant stakeholders including their interest/influence and their potential role done in consultation with the national government. This facilitated stakeholder engagement in project execution. Country ownership and driven-ness was evident during project execution.

157. Awareness raising was embedded in all project activities such as workshops and strategies in the actual plan included strategies to further raise awareness of policymakers and stakeholders especially miners.

158. Gender roles, socio-economic dimensions and links to poverty alleviation were highlighted in the project document and the NAPs. A human rights-based approach for formalization made focus on vulnerable populations at risk (women, youth, and children) in the ASGM NAP. Collection of sex disaggregated data was a challenge due to culture sensitive gender-based norms. Future projects could benefit by having a female member of the team and conducting awareness raising activities on gender.

159. The project's **weaknesses** have been mainly the administrative delays and internal conflicts in Mali that resulted in delayed reporting that resulted in delays of fund release from IA to EA. There was also delay due to the change in leadership in the Ministry of Environment in Senegal.

160. In terms of the process and quality of delivering NAP, the project benefitted by a series of reviews at the national level and by experts at the EA and IA, as well as experts from the Global Mercury Partnership.

161. Overall, this enabling project was able to deliver on the outputs and outcomes, with the support of the able executing agency and the implementing agency Task Manager. Mali and Senegal are on the road to complying with Article 7 of the Minamata Convention, ultimately protecting human health and the environment from the toxic effects of mercury.

162. ii. Lessons Learned

Lesson 1: The Executing Agency (EA) must hold pre-implementation information/expectation setting sessions with the countries. These pre-contract meetings could set expectations and ensure full

understanding of the project expected outcome and outputs. Early contracts between the Executing Agency and National Co-Executing partners should be in place to ensure timely compliance and delivery of outputs. 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: Contracts/agreements between the IA and EA and with the partner executing agency need to highlight activity and monitoring timelines. This will avoid project extensions and ensure timely delivery of specific outputs.

Lesson 3: The EA needs to anticipate capacity building needs of national partners in terms of technical, operational and administrative capacities. Countries need support especially in ASGM socio-economic assessments and the public health strategy.

Lesson 4: The selection of the national project team especially an appropriate national project coordinator is crucial to the delivery of project outputs. The team should have a balance of one with skills in ASGM and another with strong analytical and writing skills. Contracts with consultants need to specify data submission protocols where data collected in the departure of the relevant consultant, becomes a property of the project.

Lesson 5: A more realistic timeframe will benefit the project, allowing contingencies for unexpected events at country level such as issues with human resource in the national project team.

Lesson 6: Constant and regular communication between the project IA and EA addressing issues and concerns throughout execution contributes to positive delivery of outputs. Project monitoring enabled the EA to provide contingencies when Mali encountered administrative challenges.

Lesson 7: Regular multistakeholder engagement and consultation at local and country level is key to delivery of project outputs and project sustainability.

Lesson 8: Gender specific (female) relevant data and disaggregated data were difficult to obtain due to gender-based cultural norms.

Lesson 9: The project delivered a methodology on the data collection protocol for public health strategies that could be replicated in other countries in the region.

Lesson 10: Project sustainability could be ensured by having socio-political and institutional sustainability such as in the case of Senegal. Given that ASGM NAP is relevant to priorities in both Mali and Senegal, this could be a good starting point for them to seek funds for their ASGM NAP implementation. Both need to engage with other countries in the Economic Commission of West African States subregion (ECOWAS) and agree on a common approach towards mercury trade and financial sustainability. Both countries may need to form bilateral and multilateral relationships with international organizations and donors for the financing mechanism of the NAPs.

iii. Recommendations

The following are recommendations for future projects of similar nature, ie, enabling projects dealing with initial assessments and drafting of national action plans. Recommendations are addressed to the implementing agency (IA), executing agency (EA) and project executing partners/national project coordinators.

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

Recommendation 1 for the EA: The EA and its executing partner (in this case the national governments) need to be in contact even before project implementation in order to share expectations and express needs. The EA, its executing partners and stakeholders need to be engaged in the project design stage to have a sense of ownership of the project upfront. A rapid assessment of project profile of sectors especially the miners will facilitate miners' engagement with government in the project.

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

Recommendation 3 for the EA: The EA needs to anticipate and address realistically the capacity needs (technical, administrative, and operational) of countries and plan accordingly.

Recommendation 4 for the EA: The EA needs to carefully select the composition of the project team-national project coordinator and members with skills in analysis, writing, and knowledge on ASGM. Designation of the appropriate national coordinators (with track record of delivery) could ensure project success. Contracts with consultants or individual contractors need to specify protocols of data submission to avoid losing data upon sudden departure of the consultant or individual contractor.

Recommendation 5 for the EA: National level administrative challenges such as change in project personnel need to be factored in planning project execution to avoid administrative delays.

Project forecasts both for substantial and financial aspects need to consider recommendations 4 and 5.

During the implementation phase of the project,

Recommendation 6 for the IA, EA, and national project coordinators: Constant and regular communication between the IA and EA and national coordinators must be maintained in order to address issues that may arise during project execution.

Recommendation 7 for the EA and national project coordinators: Continue regular consultation and engagement of stakeholders to ensure delivery and sustainability of project results.

Recommendation 8 for the EA and national project coordinators: Have a female member of the project team in order to collect female related and disaggregated data in culturally sensitive countries. Gender mainstreaming in future projects could also be done by having a gender awareness training as part of the project.

Recommendation 9 for the EA: The methodology for data collection in relation to the public health strategy is a significant project contribution that could be replicated in other Africa countries ASGM NAPs.

Post project implementation

Recommendation 10 for 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 mercury trade and financing sustainability. Mali and Senegal may need to form bilateral and multilateral relationships with international organizations and donors for the financing mechanism of the NAPs.

Annex A: Assessment of the Quality of Project Design

A.	**Nature of the External Context**[3]		**YES/NO**	**Comments/Implications for the evaluation design** *(e.g. questions, TOC assumptions and drivers, methods and approaches, key respondents etc)*	**Section Rating (see footnotes 2 & 3) - Highly Unfavourable to 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 in both Mali and Senegal	**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	
B.	**Project Preparation**		**YES/NO**	**Comments/Implications for the evaluation design** *(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 in the ASGM sector in Mali and Senegal.	**4**
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:*		Yes	The stakeholder consultation process is well described.	

	government, private sector, civil society and those who will potentially be negatively affected)				
6	Does the project document identify concerns with respect to human rights, including in relation to differntiated gender needs and sustainable development?	i)Sustainable development in terms of integrated approach to human/natural systems	No	The project document does not mention links of the project to human rights	
		ii)Gender	Yes	Yes, the project document specifies that opportunities for women will be present by ensuring that they are well represented in national coordination mechanism.	
		iii)Indigenous peoples	No	This project does not mention engagement of indigenous peoples living in ASGM areas.	
C.	**Strategic Relevance**		**YES/NO**	**Comments/Implications for the evaluation design** *(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 to:	i) UNEP MTS and PoW	Yes	The project document highlights its relevance to UNEP MTS and POW.	**5**
		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 Mali and Senegal'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	
D.	**Intended Results and 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		Yes		**5**

	Change?				
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.	
E.	**Logical Framework and Monitoring**		**YES/NO**	**Comments/Implications for the evaluation design** *(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 made clear?		Yes		
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 disbursments 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.	**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 and appropriate to their capacities?		Yes		
H.	**Learning, Communication and Outreach**		**YES/NO**	**Comments/Implications for the evaluation design** *(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 the guidance document on NAP development	**5**
25	Has the project identified appropriate methods for communication with key stakeholders during the project life? *(If yes, do the plans build on an analysis of existing communication channels and networks used by key stakeholders?)*		Yes	The project includes an element/component of knowledge management and sharing, via national meetings and training sessions and webinars. At the national level, the coordinators will convene a national coordination mechanism that will meet and communicate regularly. There are two other levels of communication: Country to EA (AGC), 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.	
I.	**Financial Planning / Budgeting**		**YES/NO**	**Comments/Implications for the evaluation design** *(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 the both Mali and Senegal.	
J	**Efficiency**		**YES/NO**	**Comments/Implications for the evaluation design** *(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		Yes		**4**

	and/or levels of secured funding?				
30	Does the project design make use of / build upon pre-existing institutions, agreements and partnerships, data sources, synergies and complementarities with other initiatives, programmes and projects etc. to increase project efficiency?		Yes	The project considers existing partnerships at country level.	
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 which was in turn due to delays in reporting from the countries to the EA (AGC)	
K.	**Risk identification and Social Safeguards**		**YES/NO**	**Comments/Implications for the evaluation design** *(e.g. questions, TOC assumptions and drivers, methods and approaches, key respondents etc)*	**Section Rating**
33	Are risks appropriately identified in both the ToC/logic framework and the risk table? *(If no, include key assumptions in reconstructed TOC)*		Yes	The risk assessment is implicitly included in the ProDoc.	**5**
34	Are potentially negative environmental, economic and social impacts of the project identified and is the mitigation strategy adequate*? (consider unintended impacts)*		N/A	The project's aim is to provide a baseline for mercury data and information on ASGM in the country, therefore it will have no negative impacts on the environmental, social, and economic dimensions. The NAP's action plan elements are also developed so as to 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 / Replication and Catalytic Effects**		**YES/NO**	**Comments/Implications for the evaluation design** *(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 sustainability issues?		Yes	Clearly stated in section B of the prodoc.	
M.	**Identified Project Design Weaknesses/Gaps**		**YES/NO**	**Comments/Implications for the evaluation design** *(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		
N	**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) **0 = gender blind:** Gender relevance is evident but not at all reflected in the project document. **1 = gender partially mainstreamed:** Gender is reflected in the context, implementation, logframe, or the budget. **2a = gender well 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.	1	Yes	It is specified that the project is to ensure opportunities for women to participate and contribute to as well as benefit from the project outcomes. Meetings and data to be collected specify gender disaggregated data. Gender is reflected in the context, implementation, and budget	

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.

2 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.

3 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

QUARTERLY EXPENDITURE STATEMENT (US$)											
Project title:		Development of National Action Plan for Artisanal and Small Scale Gold Mining in Mali and Senegal									
Project number:		GEF 9533									
Project executing partner:		Artisanal Gold Council									
Project implementation period:		From:	5-Nov-16			To:	31-Oct-19				
Reporting period:		From:	1-Jan-20			To:	30-Apr-20				
UNEP Budget Line		GEF-approved budget		Actual expenditures incurred*							Cummulative unspent balance to-date
		Total project budget	Current year budget	Cummulative expenditures from previous period	Jan-Mar Qtr 1	Apr-Jun Qtr 2	Jul-Sep Qtr 3	Oct-Dec Qtr 4	Current year total	Cummulative expenditures to-date	
		A	B	C	D	E	F	G	H=D+E+F+G	I=C+H	J=A-I
1100	**Project Personnel**										-
1101	Project coordinator	36 998	4 092	32 906	4 092				4 092	36 998	-
1102	Project assistant		-		-				-	-	-
1200	**Consultants w/m**		-		-				-	-	-
1201	Int'l consultant for inventory training and development or review	202 896	- 34 737	237 633	9 540				9 540	247 173	- **44 277**
1300	**Administrative Support**				-				-		-
1301	Project Financial Officer		-		-				-	-	-
1600	**Travel on official business**				-				-		-

	(above staff)										
1601	Travel Project coordinator/project staff	56 371	19 764	36 607	657				657	37 264	**19 107**
2100	**Sub contracts (UN Organizations)**				-				-		**-**
2101	UN Sub-contract	100 000	-	100 000	-				-	100 000	**-**
2200	**Sub contracts (SSFA, PCAs, non UN)**				-				-		**-**
2201	Sub-contract for national implementation in Mali	237 056	2 725	234 331	773				773	235 104	**1 953**
2202	Sub-contract for national implementation in Senegal	307 704	- 1	307 705	- 8 482				- 8 482	299 223	**8 481**
3200	**Group training (field trips, WS, etc.)**				-				-		**-**
3201	Training on national inventory development (incl. Provision of materials)	7 852	- 1	7 853	- 2				- 2	7 851	**1**
3300	**Meetings/conferences**				-				-		**-**
3302	Final national lessons learned workshop		-		-				-	-	**-**
3303	Coordination Commitee meetings	2 000	-	2 000	-				-	2 000	**-**
4100	**Expendable equipment (under 1,500 $)**				-				-		**-**
4101	Operational costs	-	-		-				-	-	**-**
4200	**Non expendable equipment**				-				-		**-**

4201	Computer, fax, photocopier, projector	1 000	240	760	- 1 1				- 1 1		**1 000**
4202	Software	-	-		-				-	-	**-**
5200	**Reporting costs (publications, maps, NL)**				-				-		**-**
5201	Summary reports, visualization and diffusion of results	8 000	6 127	1 873	4 546				4 546		**8 000**
5202	Preparation of final report	5 000	5 000		5 000				5 000	5 000	**-**
5300	Sundry (communications, postages)				-				-	-	**-**
5301	Communications (postage, bank transfers, etc)	123	39	84	- 1				- 1		**123**
5500	Evaluation								-		**-**
5501	Independent Terminal Evaluation	20 000	20 000						-	-	
5502	Independent Financial Audit	15 000	15 000		3 840				3 840	3 840	**11 160**
99	GRAND TOTAL	1 000 000	38 248	961 752	19 951			-	19 951	981 703	**18 297**

Annex C: Key Stakeholders

Key Stakeholders Mali (Members of the National Steering Group)

Institution	**Focal Person**
Direction Nationale de l'Assainissement et du Contrôle des Pollutions et des Nuisances ;	M. Amadou Camara M. Oumare Cisse Mme. Kadidia Diallo
Direction Nationale de la Géologie et des Mines	M. Mamadou Diarra
Direction Nationale de la Santé	M. Moussa Ag Hamma
Direction Générale de la Protection Civile	M. Ousmane Sanake
Fédération des Femmes Mineurs du Mali	Mme. Njeieba G. Touré
Direction Nationale des Eaux et Forets	M. Mamadou Gakou
Fédération Nationale des Orpailleurs du Mali	M. Seydou Keita
ONG Appui pour la Valorisation et la promotion des initiatives privées (AVPIP)	Mme. Goundo Kouyaté Sissoko
Association des Municipalités du Mali	Mme. Balao Tamboma

Key Stakeholders Senegal

Direction de l'Environnement et des Établissements Classés	Mme. Aita Sarr Seck
Direction des Mines et de la Géologie / Direction du Contrôle et de la Surveillance des Opérations minières	M. Ousmane Wane M. Birane Niane
Direction de la Planification	M. Gabriel Sarr
Direction Générale de la Santé	Dr. Aminata Touré
Direction Générale des Douanes	Lt. Souleymane Sane
Direction du Travail et de la Protection Sociale	M. Karim Cisse
Ministère de l'Intérieur (Gendarmerie nationale, Direction de la Protection Civile)	Capitaine Ndongo Dieye
Ministère de la justice	Abdoulaye Sy
Fédération des Orpailleurs	M. Mamadou Drame

ONG la Lumière	M. Aliou Bakhoum
Tabara Cissokho	miners representant
Services régionaux des mines	various

Annex D : 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 ASGM National Action Plans in Mali and Senegal"

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 (Mali and Senegal)

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 E: Terms of Reference of the terminal review: NAP Mali and Senegal (Separate document)