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Organization of the  
United Nations

Terminal evaluation  
of the project  
“Strengthening the  
Environmentally  
Sound Management  
of Pesticides, Including  
Persistent Organic  
Pollutants”



**Project Evaluation Series  
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**Terminal evaluation of the project  
“Strengthening the Environmentally  
Sound Management of Pesticides,  
Including Persistent Organic Pollutants”**

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## **Abstract**

The project, Strengthening the Environmentally Sound Management of Pesticides, Including Persistent Organic Pollutants, is an initiative funded by the Global Environment Facility (GEF) for a total of USD 1 874 028 and co-financed with USD 7 258 000 by various institutions. Its implementation and execution were under the responsibility of the Food and Agriculture Organization of the United Nations (FAO) with co-execution by the Ministry of Environment. The project began in January 2016 and was extended until December 2023. Its objective was to eliminate obsolete pesticide stocks, including persistent organic pollutants (POP) and their containers, and to strengthen the lifecycle management of pesticides in Uruguay. To achieve this, the project had four components: reduce stocks and dispose of pesticides and containers; strengthen the regulatory framework and institutional capacity; promote pest management, pesticide use, and other alternatives; and enhance environmental monitoring. The final evaluation was summative and conducted in two phases to analyze various aspects of its performance. The evaluation followed the GEF criteria on relevance, effectiveness, progress towards impact, efficiency and sustainability, and analyzed factors affecting performance, the inclusion of a gender perspective, and environmental and social safeguards. The overall project rating from the evaluation is moderately satisfactory. The project addresses a priority issue and is considered a catalyst for achieving an integrated approach to pesticide management in the country. Progress has been made towards reducing risks to human health and the environment thanks to advances in the implementation of the Obsolete Stocks Management Plan (OSMP), primarily in the disposal of obsolete pesticides. Additionally, significant progress has been made in strengthening the management of empty containers, identifying effective integrated pest management strategies and alternatives to hazardous pesticides, and substantially enhancing capacities for pesticide monitoring. Moving forward, the focus will be on updating and strengthening the regulatory framework, fulfilling the workplan, and ensuring proper follow-up on the elimination proposal.



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## **Acknowledgements**

This evaluation exercise was carried out in two stages. The first was at the end of 2021 when the project completed its field activities. The second was at the beginning of 2023 when the project, which had been extended for an additional year, had completed the implementation of the letter of agreement (LOA) for the disposal of stored pesticides, which could not be fully assessed in Phase 1 of the evaluation.

The Evaluation Team for Phases 1 and 2 is deeply grateful to everyone who contributed to this evaluation, which was managed by Sarah Faber of the FAO Office of Evaluation (OED) (Phase 1) and Adriana Jaramillo (Phase 2). The Evaluation Team (Phase 1) was composed of Teresita Romero as team leader and Ruth Bernheim as team member.

The evaluation was conducted with the valuable support of FAO personnel in Uruguay, whose vision, knowledge, advice and comments made this assessment possible, as well as the contribution of different FAO units involved in the project.

The evaluation has benefited from the input of many stakeholders. This includes national and departmental government officials and representatives of industrial and non-governmental organizations and academia, as well as producers and FAO personnel. The team is very grateful to them for their contributions, which have been a very important source of information for the work carried out during the evaluation.

## Abbreviations

ERA	environmental risk assessment
FAO	Food and Agriculture Organization of the United Nations
GEF	Global Environment Facility
INIA	National Agricultural Research Institute, by its Spanish acronym
IPM	integrated pest management
LATU	Technological Laboratory of Uruguay, by its Spanish acronym
LOA	letter of agreement
M&E	monitoring and evaluation
MTR	mid-term review
OED	Office of Evaluation
OSMP	Obsolete Stocks Management Plan
OUA	Uruguayan Accreditation Body, by its Spanish acronym
PCU	project coordination unit
PIR	Programme Implementation Report
PPR	project progress report
POP	persistent organic pollutants
SMART	specific, measurable, achievable, relevant and time-bound
UTF	unilateral trust fund

## Executive summary

1. The aim of the terminal evaluation is to report back to the Global Environment Facility (GEF), the Food and Agriculture Organization of the United Nations (FAO), and the national government and entities that are actors and counterparts in the project execution, as well as generate and systematize the lessons learned. The specific objectives of the evaluation are to assess the degree of achievement of the results and the probability of their sustainability, identify the current or potential impacts of the project, and disseminate the findings obtained to support informed decision-making about the continuity of the processes initiated by this project and the design of future projects.
2. The project, Strengthening the Environmentally Sound Management of Pesticides, Including Persistent Organic Pollutants, began in January 2016 and was expected to end in December 2021. Its objective was to eliminate obsolete pesticide stocks, including persistent organic pollutants (POP) and their packaging, and strengthen the management of the life cycle of pesticides in Uruguay. The financing granted by the GEF for its implementation corresponds to USD 1 874 028, which was expected to be complemented by a co-financing of USD 7 258 000 for a total budget of USD 9 132 028. FAO acted as the implementing and executing agency.
3. The evaluation was carried out in two phases. Phase 1 of the evaluation, from the beginning of project implementation to August 2021, used mixed methods to triangulate and validate the information compiled from different sources, as well as collect evidence to support the findings, conclusions and recommendations. This approach also made it possible to address the limitation of not being able to carry out field visits due to the COVID-19 pandemic. The methods used were the review of documentation, studies and other information generated by the project, as well as the review of 28 external documents. It also included conducting interviews with 61 people (26 women and 35 men). The evaluation methodology considered the GEF evaluative criteria based on the findings.
4. To complete key activities, especially the implementation of the letter of agreement (LOA) to eliminate pesticides, a project extension was granted until December 2022 and then December 2023. The FAO Office of Evaluation (OED) decided to carry out an update in early 2023 (Phase 2 of the evaluation). This was done in agreement with the project coordination unit (PCU) and the FAO-GEF Coordination Unit at FAO headquarters. The decision aimed to incorporate the project's achievements after publishing the report with the Phase 1 results (conducted in February 2022).
5. Phase 2 covers the period from August 2021 to the end of 2022. The findings and conclusions of Phase 1 were the starting point. The objective was to update the results and examine and assess the progress reported by the project as of December 2022. To this end, the review examined changes in four criteria related to progress in results and their sustainability. The main findings of the two evaluation phases considering the relevant GEF criteria are presented in the following points.
6. **Relevance:** the project and its results maintain their relevance with respect to current national priorities. It focused on the sustainable development of the agricultural sector, the promotion of sustainable production and consumption, and the prevention of risks to human health. In addition, the project aligned with existing research initiatives and some agrochemical companies and producers. It also maintains its relevance to FAO Strategic

Objective 2 and the regional and country programme priorities of FAO Uruguay, as well as to the chemicals focal area strategies of the GEF-5 cycle. Therefore, the rating for this criterion is **satisfactory**.

7. **Effectiveness:** the strengthening of the management plan for empty pesticide containers was achieved within the framework of Component 1. This contributed to the reduction of risks to human health and the environment. Progress was also made in the elimination of 297.1 t of obsolete pesticides and their containers, as well as the creation of two inventories of obsolete pesticides and the preparation and authorization of the Obsolete Stocks Management Plan (OSMP). Among the milestones highlighted in Phase 2 of the evaluation is the signing of an agreement between FAO and the civil society organization, Campo Limpio, for the provision of an obsolete pesticide stocks elimination service. This initiated OSMP execution as one of the essential requirements for elimination. A co-benefit is the promotion of capacity development for the elimination of hazardous waste in the country. This agreement meant another important step towards risk reduction since it gives producers the option to eliminate obsolete pesticide stocks within the national territory. To date, progress in the environmentally sound disposal of obsolete pesticides in Uruguay has reached approximately 18 percent.
8. Within the framework of Component 2, regulations were developed that cover five stages in the life cycle of pesticides. These are under a review process by the competent authorities. Among these regulations is the legal proposal for the pesticide registration system which, in turn, includes a proposal for an environmental risk assessment (ERA). This was considered one of the main elements that would strengthen the registration of pesticides in Uruguay. The development of these proposals included the participation of different actors, including the private sector. In fact, this is valued as positive due to the responsibility that this sector has in their compliance. However, challenges remain in the approval and implementation of the proposals, such as ensuring full acceptance by some entities like the Ministry of Livestock, Agriculture and Fisheries. In fact, the Ministry of Livestock, Agriculture and Fisheries is the primary executing partner of the project and has the power to define and implement the pesticide registration system for agricultural use in the country, without prejudice to the fact that the Ministry of Environment is responsible for managing chemical substances. During Phase 2 of the evaluation, the project reported preliminary progress with updates based on the improvement proposals in the National Registry of Pesticides.
9. Within the framework of Component 3, the project was able to identify and validate effective integrated pest management (IPM) strategies and tested the effectiveness of biobeds to reduce the risk of pesticide residues. It also validated two alternatives such as fipronil, which are effective replacements for pesticides. However, actions to promote and quantify their adoption have faced limitations. The strategy to raise awareness about pesticide risks also showed areas for improvement.
10. Under Component 4, the project contributed to strengthening the analytical and personnel capacities of laboratories in the environment and agriculture sector by allowing the execution of a workplan that led to the certification of laboratories in multiwaste analysis and an increase in the number of active ingredients that can be analysed. There was also an improvement in monitoring equipment and knowledge. In addition, two scheduled evaluations of priority basins were carried out. The second evaluation, executed in the San Salvador River (FAO, 2022), showed that the analytical monitoring capacities have been

strengthened based on a more comprehensive approach and the capturing of lessons learned. Another co-benefit was the increased visibility of the analytical work carried out by the Ministry of Environment as part of project implementation. Limited progress was made in improving interinstitutional coordination for a harmonized approach to pesticide monitoring and in strengthening the complaints mechanism and the response to events linked to pesticide use. The second evaluation also highlighted the project's collaboration with government actors, which facilitated the collection and transfer of samples (Phase 2).

11. Based on this, it is considered that progress has been made towards reducing the risk to human health and the environment thanks to progress in implementing the OSMP – mainly in the elimination of obsolete pesticides. Second, strengthening capacities for local pollution management and environmental monitoring played a role. The pending agenda includes updating and strengthening the regulatory framework. Therefore, the overall rating for the effectiveness criterion is **moderately satisfactory**.
12. **Efficiency:** the project execution schedule has been extended by more than two years in response to the institutional and administrative challenges faced by the project, and those resulting from the COVID-19 pandemic. As a result of these challenges, there were significant delays in carrying out the scheduled activities. According to the information provided, this extension has increased administrative and supervisory costs by 15 percent. According to Phase 2 of the evaluation, as of March 2023, close to 99 percent of the GEF contribution (USD 1 868 154) had been executed. This represents an increase in budget execution of 0.08 percent compared to the figure reported in Phase 1 of the evaluation. However, some factors remain that continue to limit the execution of the outputs, which are associated with a lack of definition by the authorities or delays in processes and approvals, mainly under Components 1 and 2. Therefore, the overall rating for the efficiency criterion is **moderately unsatisfactory**.
13. **Progress towards impact:** the project made progress in reducing the risk to human and environmental health derived mainly from advances in pesticide elimination. This was in addition to the progress in packaging management identified in Phase 1 of the assessment. Despite not fully achieving its objective in terms of risk reduction, the processes to achieve it were initiated. It is also expected that the goal will be reached after project closure. Greater progress in risk reduction will depend largely on compliance with the workplan and follow-up to the elimination proposal. Therefore, the follow-up and monitoring processes and mechanisms must be supervised to guarantee the prevention and mitigation of risk in local transportation and handling, which is not included in the current OSMP – especially without an approved ERA. In view of the progress achieved, the rating for this criterion is **moderately satisfactory**.
14. **Sustainability:** some benefits derived from the project will remain even after its end (for example, the development of monitoring capacities, the strengthening of the management of empty pesticide containers and the dissemination of alternatives to toxic pesticides). In addition, the active participation of academia and the private sector, as well as the materialization of different sources of co-financing during the project's life are positive aspects for the future scope of the expected impacts. To this end, FAO's continued advocacy will be essential considering the need for a multisectoral approach that is open to the private sector and academia. In addition to these benefits, the elimination of obsolete pesticide stocks generates benefits. It is considered that this benefit will continue once the project is completed since it is a legal mandate of the private sector and key

conditions have been enabled for the implementation of the OSMP. These include the definition of processes, agreements, the promotion of management capacity and the elimination of identified stock. The main challenges are the need to improve the regulatory framework, which highlights the importance of ERA for the definition and monitoring of safeguards, as well as the updating of the pesticide registration system. Considering these assumptions, the rating for the sustainability criterion is **moderately likely**.

15. **Factors affecting performance:** the project addresses priority problems, and its design is considered a catalyst to achieve a comprehensive approach to pesticide management in the country through the incorporation of health, production and environmental visions. However, a more elaborate strategy was necessary from project formulation to reconcile these visions and achieve a common vision of the project among its partners. The lack of this shared vision was reflected in different areas of project execution.
16. For example, the Ministry of Environment was active in the project. This, however, has not been free of administrative complications and led to the approval of the OSMP taking almost two years. The Ministry of Livestock, Agriculture and Fisheries actively participated in the project, but only in activities that were aligned with its pesticide management approach. For its part, the participation of the health sector has been contemplated since project formulation. However, due to changes in the project strategy, the Ministry of Public Health was only invited to participate during the execution phase. In addition, the project received strong support from academia and research centres through the signing of the LOA for the development of methodologies linked to the IPM and environmental monitoring.
17. FAO, for its part, supported the conceptualization and development of the project, which is an important priority for the Uruguayan Government. However, the quality of implementation was affected by several factors related to the design and technical supervision, as well as the COVID-19 pandemic. The execution was carried out in a difficult situation, which involved the implementation of adaptive measures that alleviated some problems. Others, however, led to modifications in the project strategy. It is considered that the project's direct execution modality is the correct method for these types of projects, where it is crucial to reconcile the different approaches in a neutral setting provided by FAO. However, the multisectoral approach strategy must be strengthened based on lessons learned from this project. Therefore, project implementation is considered **moderately unsatisfactory** and the execution **moderately satisfactory**.
18. In addition, and according to the information reported by the project, the co-financing commitment was fully met and even exceeded with a total reported contribution of USD 10 057 900. All that remains is to formalize the official report of the final co-financing provided by the partners. Therefore, the rating for this criterion is **satisfactory**.
19. The monitoring and evaluation (M&E) plan includes most of the elements and requirements necessary to fulfil its function, and its objectives were almost entirely met. However, it was noted that some indicators were not specific, measurable, achievable, relevant and time-bound (SMART). This made the project difficult to monitor. Furthermore, it was necessary to develop methodologies from the beginning of the project to measure some of its results and strengthen the monitoring and reporting of its progress. Thus, the rating for this criterion is **moderately unsatisfactory**.

20. **Commitment of partners and stakeholders:** the project implemented successful mechanisms for the involvement of the private sector, including the integration of representatives in the working group for the development and proposal of regulations. The exception was the updating of the registration system, which did not consider a participatory process for its development. The project worked with nine family farms managed by producers, even though the main involvement of this group of actors was in outreach activities. The rating for this criterion is **satisfactory**.
21. **Knowledge management, communications and public awareness:** the project has generated important knowledge on the IPM practices for crops of interest in Uruguay and alternatives to dangerous pesticides. This is in addition to scientific publications and dissemination materials. However, training and awareness raising actions on the knowledge generated were not always the result of an analysis based on the needs of the target audience. Furthermore, the project did not robustly measure the effect of these actions, which would have allowed for greater knowledge about the dissemination of the information provided. Also, the lack of consensus on the approach that the project should promote to reduce the use of pesticides affected the communications strategy. Therefore, the rating for this criterion is **moderately unsatisfactory**.
22. **Gender:** despite not having been established as mandatory in the formulation phase, the project carried out some actions to incorporate the gender perspective. The main efforts were made in response to a recommendation in the mid-term review (MTR). However, from this point onwards, indicators were not included for monitoring in the results framework, nor was a specialist hired to support the design work of gender mainstreaming and its implementation. Despite these difficulties, the project achieved a significant female participation rate. This was mainly in the activities of planning, dissemination and the strengthening of analytical capacities. This involved opportunities for improvement in other activities, such as the selection of demonstration properties, where the participation of women was not promoted and the work of female producers was not recognized. The rating for gender is **moderately satisfactory**.
23. **Environmental and social safeguards:** the authorized disposal plan for obsolete pesticide stocks does not include an ERA linked to such stock, as indicated in the environmental management toolkits for obsolete pesticides (FAO, 2009a; 2009b; 2011a; 2011b). The plan does not provide instructions on how the inventory should be managed on-site and transported to the temporary collection centres. It only mentions that the holders must be responsible for the delivery of their inventory to these temporary centres. According to the surveys carried out, 88 percent of pesticide stocks were not registered as obsolete. However, 28.4 percent of these had damaged packaging and 20.9 percent had been opened. In addition, 1.3 percent is recorded with losses and 0.05 percent is dispersed, which implies repackaging on site. In addition, the condition of packaging 10 percent of stocks is unknown. This situation becomes more complex when considering that strengthening capacities for the management of obsolete pesticides in the government and private sectors was not prioritized. This would have increased staff knowledge about the work of eliminating obsolete pesticides. The rating for this criterion is **moderately unsatisfactory**.

## Conclusions

**Conclusion 1.** The project started the process to integrate productive, environmental and health approaches that strengthen the management of pesticides based on their life cycle. This had not been addressed in the country and is considered a priority. More projects, actions and political will are required to fully achieve its objective since this process is still in its early stages.

**Conclusion 2.** The objective, strategy and results of the project remain consistent with national priorities and the initiatives of producers of phytosanitary products and other companies. They are also aligned with the strategies of FAO and the GEF.

**Conclusion 3.** The project strengthened the management of empty pesticide containers, as well as identified effective IPM strategies and alternatives to hazardous pesticides. It also significantly strengthened capacities for pesticide monitoring, among other achievements.

**Conclusion 4.** The bases for the integrated and effective management of pesticides must be strengthened to significantly reduce the risks to human health and the environment that they represent. This includes compliance with the workplan and monitoring of the elimination proposal, as well as the effective strengthening of the regulatory framework.

**Conclusion 5.** The risk posed by empty pesticide containers has been reduced and progress has been made towards reducing the environmental and human health risk posed by obsolete pesticide stocks – even though the risk remains until progress is made towards their elimination. In addition, the active participation of academia and the private sector, as well as the materialization of different sources of government and private co-financing during the project's life cycle, are positive aspects for sustainability and the future scope of the expected impacts.

**Conclusion 6.** The OSMP should be strengthened by including an ERA of the sites where obsolete pesticide stocks are located in order to support environmental and social safeguard actions. It will also require a possible update to include the most recent pesticide inventory figures.

**Conclusion 7.** The project reported the materialization of co-financing that is greater than the amount committed at the beginning of the project. Formalizing the official report of the provided final co-financing is all that is necessary. However, in the future, there are financial risks linked to government budget cuts.

**Conclusion 8.** Project execution was extended for more than two years, mainly due to the intrinsic difficulties of executing a project with a multisector approach. The COVID-19 pandemic also generated some budget restrictions, which affected its efficient implementation.

**Conclusion 9.** The inherent complexity of the project's multisectoral approach – which seeks to integrate productive, environmental and health approaches to pesticide management – and the need for a more elaborate strategy to achieve a common project vision and closer technical supervision generated limitations in project implementation.

**Conclusion 10.** The project generated tools and complied with the progress reports required for monitoring. However, some indicators were not SMART. This made results-based monitoring difficult. Also, the development of methodologies to measure some of the project results fell short, and the project progress report (PPR) shows areas for improvement.

**Conclusion 11.** The project formed working groups at the beginning of execution to agree on the details of the project activities. Some of these groups remained in operation until the tasks were completed and others were dissolved once the actions had been planned. Thus, the stakeholder engagement mechanisms implemented by the project were mostly successful.

**Conclusion 12.** Considering the voluntary nature of incorporating the gender approach in the project and that the recommendation to incorporate it was made after the MTR, the project showed significant participation of women in the training and dissemination activities carried out. However, in activities linked to IPM promotion, the role of rural producers was not made visible or strengthened – nor were rural teachers trained on the risks of pesticides, as planned in the project document.

**Conclusion 13.** The lack of specific and updated gender statistics during project document preparation, particularly on the representation of women in public decisions, limited opportunities for the analysis of the core drivers of gender inequality. The project could have had an impact on these. As a result, this weakened the proposed gender mainstreaming approach in the project design phase.

## Recommendations

### For the project

**Recommendation 1.** For the Ministry of Environment and Campo Limpio: update the OSMP to include the evaluation of environmental risk linked to obsolete pesticide stocks. Include specific safeguards to prevent accidents during the handling of obsolete pesticides and their containers at their place of origin and during transportation to the temporary collection centres. Also update pesticide inventory data.

**Recommendation 2.** For FAO Uruguay: in order to ensure the sustainability of the project results and achieve the expected impacts, follow up on the proposed regulations to ensure their approval. This should include promoting the agreement with the Ministry of Environment and the Ministry of Livestock, Agriculture and Fisheries to continue improving the country's pesticide registration system based on the project proposal, as well as ensure compliance with the workplan and monitor the elimination plan.

**Recommendation 3.** For FAO Uruguay and the co-financing partners: formalize the report of the final co-financing from the co-financing partners by delivering a signed letter about the final amount provided and the items covered by the co-financing. This step should form part of a broader discussion on the role that co-financing partners will have in ensuring the sustainability and expected impact of the project.

### For future projects

**Recommendation 4.** For FAO technical units, the FAO-GEF Coordination Unit and government partners: when the project's objective and strategy involve combining the visions of the productive sector with the environmental and health sectors, it is suggested to ensure, with the support of national regulations, that the project partners that represent these sectors are effectively involved in the project design, that a common vision is achieved and that an equal level of responsibility is ensured with the same weight in decision-making. As part of this process, the FAO direct execution modality should be considered.

**Recommendation 5.** For FAO technical units, the FAO-GEF Coordination Unit and government partners: in projects with a comprehensive scope that includes topics covered in the GEF chemicals focal area, strengthen the analysis of the legal framework and governance in the country or region where the activities will be implemented in order to mitigate the risks involved due to the lack or limitations of such a framework for the execution of certain tasks (for example, the remediation of contaminated sites).

**Recommendation 6.** For FAO (Chief Technical Officer, Funding Liaison Officer, FAO-GEF Coordination Unit): strengthen and remind project implementers regarding the importance of the

start-up workshop to review the M&E plan and identify the information needs to be generated, especially the methodologies and indicators to be used, in order to allow them to accurately evaluate the progress towards the expected outputs and outcomes. In addition, strengthen the review process of semi-annual and annual Programme Implementation Reports (PIRs) to ensure that they objectively reflect the results, changes and progress towards the expected impacts.

**Recommendation 7.** For FAO and the co-executing partners: for the preparation of the initial gender analysis, which will support the strategy and workplan of new projects, project design participants are encouraged to make use of existing studies or carry out their own specific quantitative and qualitative studies (primary data). This will allow for the collection of solid evidence for an effective analysis and work strategy.

**Executive summary table 1. The GEF evaluation criteria rating table**

The GEF criteria/subcriteria	Rating	Summary comments
<b>A. STRATEGIC RELEVANCE</b>		
A1. Overall strategic relevance	S	The strengthening of the management of pesticides, including obsolete and highly hazardous pesticides, throughout their life cycle remains a priority.
A1.1. Alignment with the GEF and FAO strategic priorities	S	The results of the project contribute to the promotion of environmentally sustainable agriculture and show progress towards reducing risks due to the use of chemical substances.
A1.2. Relevance to national, regional and global priorities and beneficiary needs	S	There is an alignment of the concept and results of the project with the policy of the sustainable intensification of agriculture of the Uruguayan Government and with its interest in promoting sustainable agrifood systems.
A1.3. Complementarity with existing interventions	S	The project is aligned with initiatives of research centres, companies and producers that allowed for the successful validation of the IPM practices and alternatives to dangerous pesticides.
<b>B. EFFECTIVENESS</b>		
B1. Overall assessment of project results	MS	Among the results achieved is the development of capacities in local pollution management and environmental monitoring, and progress towards reducing the risk to human health and the environment due to the elimination of pesticides. However, the remaining challenges include continuing to strengthen the regulatory framework and guarantee risk reduction in compliance with the workplan and adherence to the elimination proposal.
B1.1. Delivery of project outputs	MS	Important outputs were achieved, such as strengthening the management of empty pesticide containers, validating the IPM strategies and alternatives to highly toxic pesticides, and developing inventories of obsolete pesticides and environmental monitoring capabilities. Among the outputs not achieved, or partially achieved, is strengthening government training on the management of obsolete pesticides and the development of a communications strategy to raise awareness about the risks of pesticides.
B1.2. Progress towards outcomes and project objectives	MS	Progress has been made towards the outcomes and objectives of the project through risk reduction, mainly due to the implementation of the OSMP and the elimination of pesticides. However, it is necessary to move forward with the approval of the proposed regulations to strengthen the regulatory framework for pesticides and management throughout their life cycle, which is the second component of the project objective.
Outcome 1.1. Reduced risks to human health and the	MS	Progress is identified in risk reduction with the implementation of the OSMP through the signing of the contract between Campo

The GEF criteria/subcriteria	Rating	Summary comments
environment through the safe disposal of POP and other obsolete pesticides, and by developing capacity in the remediation of pesticide-contaminated soils		Limpio and Krile, and the start of the elimination of pesticides. However, the workplan needs to be strengthened and adequate compliance with the technical proposal must be guaranteed to identify and measure risk reduction.
Outcome 1.2. Capacities developed in local pollution management	S	Through the development of a guide, training was provided on how to respond to incidents and accidents due to the use of pesticides. The objective was met.
Outcome 2.1. Improved legal and regulatory framework for the environmentally sound management of pesticides	MS	There are regulatory proposals, but these have not been approved and, therefore, are not supported with a budget allocation. The proposals remain under discussion as part of the collaborative work between the ministries. The objective was partially met.
Outcome 3.1. Reducing the use of toxic pesticides through the adoption of integrated pesticide management and other alternatives	UA	The project identified practices that reduce pesticide use. However, the reduction could not be measured because it was not within the project's scope to ensure the adherence of trained producers to the practices taught. The Evaluation Team is aware that, at least in the demonstration properties, the use of pesticides was reduced. However, it was not possible to estimate the total reduction, which, according to the project document, should have been at least 200 t.
Outcome 3.2. Increased awareness about the effects of conventional pesticides and available alternatives	UA	The project carried out training and dissemination actions. However, to measure the increase in awareness about the effects of pesticides, it used a weak methodology and, due to the cancellation of the field mission as a result of the COVID-19 pandemic, the Evaluation Team interviewed a small number of producers. This prevented it from giving an opinion on the matter.
Outcome 4.1. Increased capacity for timely monitoring and response to pesticide risks to human health and the environment	MS	Analytical and personnel capacities were developed in the laboratories of the Ministry of Livestock, Agriculture and Fisheries and the Ministry of Environment. The second monitoring programme was broader and more comprehensive, with progress made towards meeting the challenges of institutional coordination.
Overall rating of progress towards achieving project outcomes/objectives	MS	Progress was made towards risk reduction, strengthening pesticide management such as proposed regulations, strengthening the empty container management plan, and developing effective IPM practices. It is necessary to move towards increased risk reduction through the elimination of compromised pesticides and advance in other areas such as strengthening the regulatory framework. Monitoring is required to ensure compliance.
B1.3. Likelihood of impact	MS	The project has made progress towards the expected impact, mainly through its advances in pesticide elimination. Despite not achieving the overall target in terms of pesticide elimination, the processes to achieve it were initiated. Future progress in risk reduction will depend largely on compliance with the workplan and monitoring of the elimination proposal. It is necessary to monitor the outputs and results achieved by the project towards the expected impact.
<b>C. EFFICIENCY</b>		
C1. Efficiency	MU	The project was extended by more than two years, with budget under execution and some outputs and outcomes not yet achieved or measured. This situation is mainly the consequence of a poor response capacity and the lack of definition of some government partners of the project. This caused delays in the

The GEF criteria/subcriteria	Rating	Summary comments
		development of activities alongside the COVID-19 pandemic, which limited the available resources from the Ministry of Environment and delayed the execution of some activities.
<b>D. SUSTAINABILITY OF PROJECT OUTCOMES</b>		
D1. Overall likelihood of risks to sustainability	ML	The institutional and financial risks for the sustainability of the results are moderate to low. In addition, the active participation of academia and the private sector, as well as the materialization of different sources of co-financing during the life of the project, are positive aspects for the sustainability of the results achieved. To this end, FAO's continued advocacy will be essential, particularly in relation to the need for a multisector approach that is open to the private sector and academia.
D1.1. Financial risks	ML	Financial risks are low since elimination costs will be covered by the private sector, as will actions to continue the management of empty containers.
D1.2. Sociopolitical risks	ML	The COVID-19 pandemic generated a change in priorities at a global and national level, and its evolution generated unexpected changes to government planning.
D1.3. Institutional and governance risks	ML	The institutional tension between the Ministry of Environment and the Ministry of Livestock, Agriculture and Fisheries is the greatest governance risk. The project has supported dialogue between the authorities of both ministries, and the authorities of the new government have shown greater interest in addressing these issues.
D1.4. Environmental risks	MU	Progress was made in reducing environmental risks by strengthening the empty pesticide containers programme and laboratory monitoring capabilities, and starting the elimination of obsolete pesticides. However, there remain certain environmental risks derived from local transportation and handling, which were not identified in the OSMP, especially without an approved ERA. This evaluation must be carried out in the sites where obsolete pesticides are located.
D2. Catalysis and replication	MU	The need for new legal and management bases to ensure environmental protection and health services while promoting agricultural development implies important risks for strengthening pesticide management in the country considering their life cycle.
<b>E. FACTORS AFFECTING PERFORMANCE</b>		
E1. Project design and readiness	MU	The project addresses an issue of great relevance to the country's environmental and productive sector. However, it was designed without completely achieving a common vision between the Ministry of Livestock, Agriculture and Fisheries and the Ministry of Public Health.
E2. Quality of project implementation	MU	The quality of the implementation was affected by several factors stemming from the design and technical supervision, as well as the COVID-19 pandemic.
E2.1. Quality of project implementation by FAO (Budget Holder, Lead Technical Officer, Project Task Force, etc.)	MU	The identification of the project and its assessment as a priority and innovative initiative for Uruguay was appropriate. However, its technical supervision faced certain limitations. Areas for improvement were identified in the methodologies used to strengthen capacities and measure compliance with indicators, and in the monitoring and review of annual progress reports.
E2.1 Project oversight (project steering committee, project working group, etc.)	MU	The project steering committee addressed strategic issues such as the approval of workplans and other issues like communication and project visibility. However, no measures or decisions were

The GEF criteria/subcriteria	Rating	Summary comments
		taken to prevent possible non-compliance with results and outputs or to reduce the reported interinstitutional tension.
E3. Quality of project execution For directly implemented projects: FAO Project Management Unit/Budget Holder	MS	The PCU proposed adaptive measures (e.g. greater collaboration and work with academia and the private sector, as well as with government entities interested in the issue) during execution, which alleviated some institutional problems and delays generated by factors external to the PCU. However, due to the challenging situation, modifications had to be made to the results framework. This also generated long response times from institutions for essential project processes (e.g. hiring and a review of the terms of reference). The change of government also delayed some activities.
E4. Financial management and co-financing	MS	No areas for improvement were identified regarding financial management. In terms of co-financing, the goal was exceeded and only the official report is required at project closure to confirm the total amount.
E5. Project partnerships and stakeholder engagement	S	Working groups were formed to define and agree upon the execution of the activities, which effectively involved most of the stakeholders identified in the project document.
E6. Communications, knowledge management and knowledge products	MU	Valuable knowledge and materials were generated, which would have benefited from a targeted communications strategy.
E7. Overall quality of M&E	MU	The results framework contains some non-SMART indicators. In some cases, progress reports did not objectively reflect actual project performance. In addition, the results of the monitoring tool were not formally reported, which generated confusion about compliance with its indicators. The MTR showed various omissions and, in some cases, a lack of clarity in its conclusions.
E7.1 M&E design	MU	The M&E plan contains most of the requirements necessary to monitor a GEF-funded project. However, some indicators were not SMART.
E7.2 M&E implementation plan (including financial and human resources)	MU	The financial resources allocated during the design of this activity were appropriate. However, hiring a monitoring expert during execution would have helped to modify or improve the results framework indicators, develop a better monitoring tool, and ensure an objective report on the project's progress.
E8. Overall assessment of factors affecting performance	MU	Adequate financial management was carried out and important knowledge was generated for the promotion of the IPM and alternatives to pesticides. Successful stakeholder engagement processes were identified, and co-financing exceeded the expected goal. However, the lack of effective involvement on behalf of some counterparts negatively impacted execution and implementation. Areas of improvement were identified in terms of technical supervision, results framework indicators, progress reporting and institutional response times. There was no communications strategy.
<b>F. CROSS-CUTTING ISSUES</b>		
F1. Gender and other equity dimensions	MS	The project achieved significant participation of women. However, some proposed actions could not be implemented after the MTR due to the lack of progress of the project and its omissions.
F2. Environmental and social safeguards	MU	No actions have been included in the OSMP to safeguard the holders and the environment during the repackaging and transportation phase from the places of origin where the pesticide stocks are located to the temporary collection centres.

The GEF criteria/subcriteria	Rating	Summary comments
<b>Overall project rating</b>	MS	<p>The project addresses a priority issue and is considered a catalyst to achieve a comprehensive approach to pesticide management in the country. Important advances were achieved, the amount of co-financing reported was higher than expected, and successful mechanisms were implemented for the involvement of the private sector and academia. However, a more elaborate strategy would have been necessary during the formulation of the project to achieve a common vision among its partners. This situation was reflected during the execution of the project, with some measures still pending completion or in need of strengthening (e.g. the quantities of obsolete pesticides to be eliminated). However, the necessary processes were started and enabling conditions were generated, such as agreements and capacity development for the management and disposal of pesticides. In this regard, the continuation and monitoring of these processes by the executing and co-financing partners is necessary for the sustainability of the results and to achieve the expected impact.</p>

*Note:* The rating for the evaluated criteria is the result of assessments carried out in the two phases of the evaluation.

# 1. Introduction

1. The evaluation report is in six sections. In the first two, the objectives and scope of the evaluation are presented, as well as the methodology of Phase 1 of the evaluation, the background and the context. The following sections present the findings from the evaluation of each phase. Section 3 presents the findings from Phase 1 of the evaluation for each of the Global Environment Facility (GEF) evaluation criteria, and Section 4 presents the main findings on the updated criteria in Phase 2 of the evaluation. The final sections present the conclusions, recommendations and lessons learned.

## Box 1. Basic project information

**The GEF ID – project code:** 5144

**Recipient country:** Uruguay

**Implementing agency:** Food and Agriculture Organization of the United Nations (FAO)

**Executing agency:** FAO

**Executing partner:** Ministry of Environment (formerly the Ministry of Housing, Territorial Planning and the Environment)

**Date of project start and expected end:** from 4 January 2016 to 31 December 2023

**Date of the mid-term review (MTR):** 31 August 2018

## 1.1 Purpose of the evaluation

2. The terminal evaluation was carried out with a dual purpose, as agreed upon between the parties in the project document and in accordance with the standards and requirements of the GEF. The evaluation will serve to report back to the donor (the GEF) and government agencies, the Food and Agriculture Organization of the United Nations (FAO), and other entities that are actors and counterparts in project execution. In addition, it has the purpose of generating knowledge and systematizing the lessons learned.
3. In accordance with the provisions of the project document, the evaluation will assess the degree of achievement of long-term results and identify and describe the current or potential impacts of the project and the probability of the sustainability of the results. If applicable, this includes a description of the future processes to be carried out when the project has ended, allowing for the total or partial continuity of the results or benefits of the project. In addition, the evaluation will promote the dissemination of the outputs that have been achieved and the good practices that have been identified.

## 1.2 Intended users

4. The users and intended uses of this assessment are shown in Table 1.

**Table 1. Users and uses of the evaluation**

<b>User</b>	<b>Expected use</b>
Project team and project steering committee	The findings, recommendations and lessons learned derived from the evaluation may be analysed by these entities in order to jointly agree upon the path to: ensure the sustainability of the project results; expand the impact in successive phases; and share the good practices and technical outputs of the project.
Ministry of Environment, Ministry of Livestock, Agriculture and Fisheries, and Ministry of Public Health	The knowledge and experience gained in the design and implementation of this project, as well as the results of the evaluation, will allow these institutions to strengthen the design and implementation of similar interventions in the future. Also, it will enable them to improve the scope and sustainability of the results after the project ends.
The GEF	It will be able to use the conclusions and recommendations of the evaluation so that it can contribute to making strategic decisions about future similar interventions and as input for future evaluations of its projects.
FAO Uruguay	It will be able to use the main results of the evaluation as inputs for its next strategic planning process and for the design and execution of new projects – with or without the GEF financing.
FAO-GEF Coordination Unit at headquarters	It will be able to use the conclusions, recommendations and lessons learned from the evaluation to improve the design and implementation of future FAO-GEF portfolio projects at the global and national levels. It may also consider good practices to contribute to knowledge management and dissemination, as well as sharing them with the FAO-GEF community.
Campo Limpio civil association	It will take the recommendations and lessons learned from the project to support other projects focused on strengthening pesticide management.

Source: Authors’ own elaboration.

### 1.3 Scope and objectives of the evaluation

5. Regarding the temporal scope, the evaluation has been carried out in two stages. Phase 1 of the terminal evaluation covers the beginning of project execution until August 2021, taking into consideration the findings and conclusions of the mid-term review (MTR). In order to complete key activities, the project was extended until December 2022, and then until December 2023. The FAO Office of Evaluation (OED), in agreement with the project coordination unit (PCU) and the FAO-GEF Coordination Unit at headquarters, decided to carry out an update of the results (Phase 2) of the evaluation in early 2023. The objective was to report on the project achievements after the February 2022 report, which covered the results of Phase 1.
6. In relation to the geographical scope, the evaluation was carried out at the national level in accordance with the project’s scope of action, emphasizing the geographic areas where the demonstration properties were located for the validation of the integrated pest management (IPM) practices and alternatives to harmful pesticides, as well as in the La Laguna del Cisne basin in the Department of Canelones.
7. The use of the methods cited in the methodological section is governed by the evaluation questions that were indicated in the terms of reference of this terminal evaluation (Table 3). The Evaluation Team developed subquestions derived from those guiding evaluation questions. Both types of questions are included in an evaluation matrix that was included in the evaluation’s initiation report. The update (Phase 2) focused on examining changes in four evaluative criteria and subcriteria on which the findings and respective assessments are based. These are: (i) effectiveness; (ii) progress towards impact; (iii) efficiency; and (iv) sustainability.

**Table 2. Evaluation questions by the GEF criteria**

<b>1. Relevance</b>	Have the project objectives and results been (and continue to be) consistent with the GEF programme's operational areas/strategies, national priorities and the FAO Country Programming Framework?
<b>2. Effectiveness and achievement of project results</b>	<p>What outcomes, intentional and unintentional, has the project achieved, and to what extent did these contribute to the achievement of the project's environmental and development objectives?</p> <p>What achievements and results have been achieved at the level of each component?</p> <p>Were the capacity development activities based on real needs, relevant to the sector/beneficiaries, and have they capitalized on existing capacities?</p> <p>What was the contribution of the knowledge generated or mobilized by the project to achieving the results?</p>
<b>3. Efficiency, implementation and project execution</b>	<p>In what way have the modalities of intervention, the institutional structure, the financial, technical and operational resources and procedures available, and the communications strategy contributed to or hindered the achievement of the results and objectives of the project?</p> <p>Is there any aspect that warrants further follow-up?</p>
<b>4. Co-financing</b>	<p>To what extent has the planned co-financing materialized, and how has lower-than-expected co-financing affected the project results?</p> <p>Has the project managed to mobilize new co-financing throughout its implementation that was not considered in the original design?</p>
<b>5. Monitoring and evaluation (M&amp;E)</b>	<p>To what extent has the M&amp;E plan and its implementation been efficient and contributed to the project results?</p> <p>What monitoring instruments has the project developed at the local and national level?</p>
<b>6. Stakeholder engagement</b>	<p>To what extent did the project ensure the participation and empowerment of partners and stakeholders in the analysis, planning and implementation processes?</p> <p>Have other actors, such as civil society or the private sector, been involved in the design or implementation of the project, and how has this affected the project results?</p>
<b>7. Vulnerable groups (gender and Indigenous Peoples)</b>	<p>To what extent have gender considerations been taken into account in the design and implementation of the project?</p> <p>To what extent has the project ensured parity in participation and benefits, contributing to the empowerment of women, youth and other vulnerable groups?</p>
<b>8. Sustainability</b>	<p>What environmental and social safeguards were implemented to ensure the sustainability of activities?</p> <p>How sustainable are the results achieved to date at an environmental, social, institutional and financial level?</p> <p>How likely is it that the usefulness of the results achieved by the project will continue after the project ends?</p> <p>What are the risks that may affect the sustainability of the project results?</p>
<b>9. Progress towards impact</b>	What preliminary signs of impact can be identified by the project's contribution?

Source: Authors' own elaboration.

8. To facilitate reading, the evaluation report has been structured in two parts: the first part (Sections 1, 2 and 3) contains the methodology, background and findings of Phase 1 of the evaluation, while the second (Section 4) details the objectives, scope and findings of the

update (Phase 2). The conclusions, recommendations and lessons learned (Sections 5 and 6) are based on the analysis of the two phases of the evaluation.

## 1.4 Methodology (Phase 1)

9. This is a final or "summative" evaluation, carried out at the end of each project to analyse different aspects of its performance. To this end, different methods are used to collect robust evidence. This supports the assignment of a final rating to the project in the different aspects evaluated. Consultations with stakeholders followed ethical guidelines to ensure the safe, non-discriminatory and respectful participation of those involved, and that all those who participated are aware of the purpose of the evaluation, that their participation is voluntary, and that all information is confidential.
10. The evaluation was guided by the norms and standards of the United Nations Evaluation Group. It adopted a consultative and transparent approach throughout. In particular, the process was implemented in close collaboration with FAO Uruguay and the project steering committee. In addition, the evaluation considers the criteria and requirements of the GEF to facilitate comparison with its reports and contribute to the selection process of its programme. Therefore, the assessment of the different aspects of the project was carried out through the assignment of a rating based on the GEF scale (Appendix 3).
11. The evaluation reconstructed the project's theory of change, as presented in Section 2. Through the theory of change, it sought to capture the causal relationship between inputs, expected outputs detailed in the project results framework, results to which these should contribute and conditions under which they should occur. The adapted theory of change includes certain assumptions and was used for the analysis of project strategy and design.
12. The triangulation of information was a key process to generate solid and verifiable evidence that supports the findings and recommendations derived from this evaluation.
13. The methods used in this evaluation are outlined in the following points.
  - i. Desk review: an exhaustive review of the project documentation was carried out. This included the semi-annual and annual progress reports, the technical products derived from the direct work of the PCU and the contracted consultancies, the MTR report, the annual operational plans, the co-financing reports, the project steering committee meetings, the tool used to monitor the project, and national and regional strategic documents. This review provided input to analyse each of the GEF evaluative criteria and allowed for better focused questions during the interviews. The documents consulted are listed in the bibliography.
  - ii. Information collection: In order to obtain the opinions, perspectives, data and observations on project implementation from the implementers, beneficiaries, and other national and local actors, semi-structured remote, individual and group interviews were conducted. Interview protocols were developed and different communication tools were used to carry these out, such as video conferences via Zoom and calls to a landline or cell phone, or via WhatsApp. A total of 61 people were interviewed (Appendix 1), including 26 women and 35 men. The criteria for selecting the people interviewed were based on having representation from each sector that participated in the project. This therefore involved the list of interviewees from the national and departmental government sector, non-

governmental organizations (NGOs), producers, academia and business associations. The information collection phase spanned from May to August 2021. Every attempt was made to have updated information that covered until the end of this phase. This was not possible, however, in some cases.

## **1.5 Limitations (Phase 1)**

14. The limitations of this evaluation were mainly due to the country's health situation caused by the COVID-19 pandemic, which was aggravated by the community circulation of the virus and, consequently, by the number of infections from the months prior to the start of the evaluation. In this context, the national government implemented measures that included lockdowns, physical distancing and restrictions on mobility, which hindered in-person interviews and field visits to the demonstration properties and monitored basin to observe the work carried out and interview the producers and local government staff. To compensate for this limitation, the project sought to interview actors who belonged to different sectors (for example, government, civil and private sectors) to triangulate the information provided and strengthen the evidence. However, due to limited availability of and access to communications equipment, only a small number of producers were interviewed that participated in the training actions provided by the project.



## 2. Background and context of the project

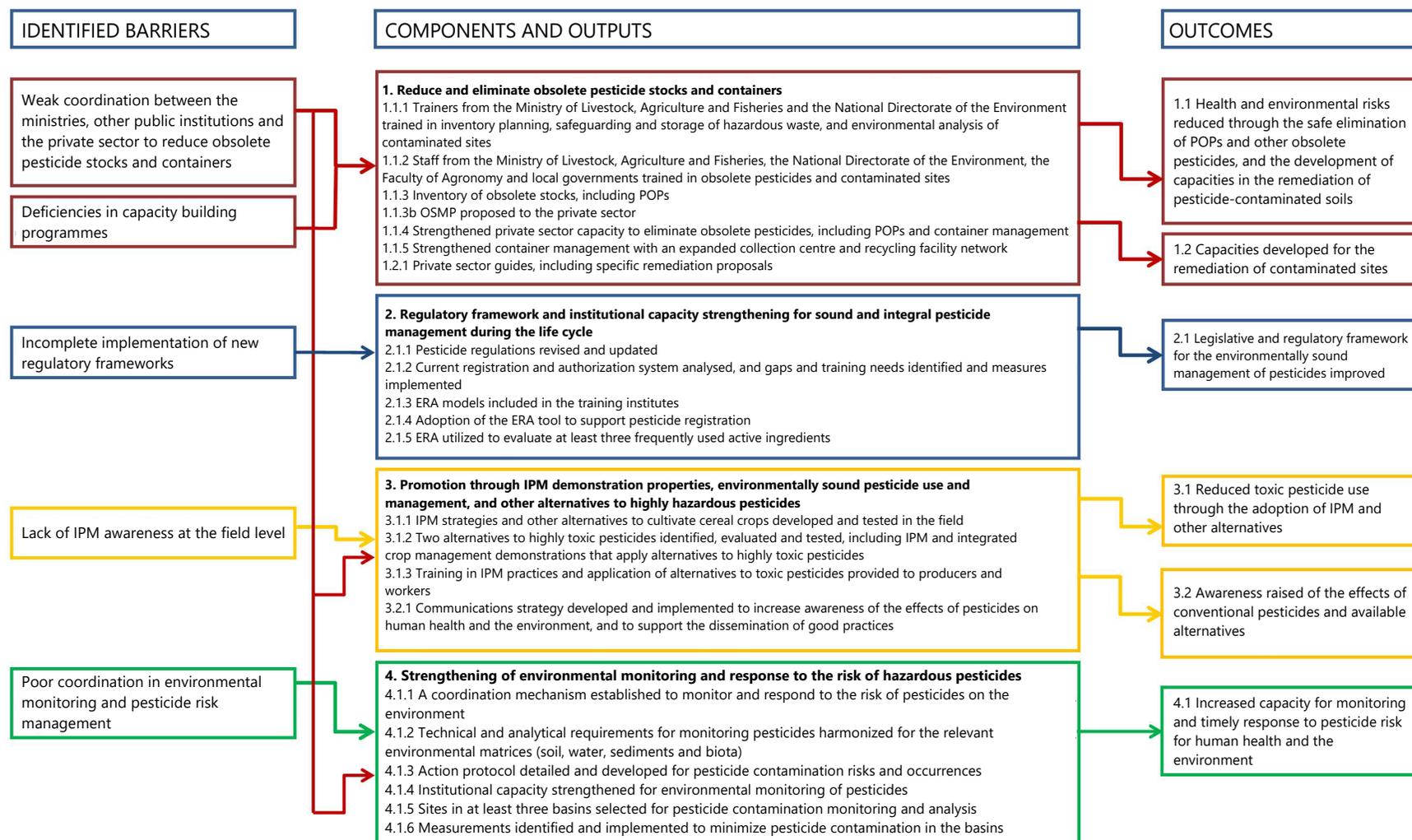
### 2.1 Context of the project

15. Uruguay has a natural resources base that supports agricultural production in practically the entire national territory. This gives it productive advantages that are important drivers of economic growth. Although agricultural activity promotes development by being a source of food and work, it also generates different pressures on the environment. One of the main environmental problems associated with agriculture is the use of pesticides to control pests.
16. As part of several international agreements signed to regulate the use, marketing and production of different pesticides, Uruguay has assumed specific commitments in this regard.<sup>1</sup> In particular, as a result of the Stockholm Convention on Persistent Organic Pollutants, signed in 2004, the government has proposed strategies and lines of action that are reflected in the National Implementation Plan of the Stockholm Convention, which was developed in 2006 (Government of Uruguay, 2017). The plan aims to eliminate or limit the production, use and import of Persistent Organic Pollutants (POP) in addition to preventing and mitigating damage to the environment. Different ministries have participated in the development of this plan, including the Ministry of Livestock, Agriculture and Fisheries and the Ministry of Public Health.
17. In 2013, the Government of Uruguay approved Decree 152/2013 (Ministry of Housing, Territorial Planning and Environment, 2013). This introduced the principle of extended responsibility under which the private sector is responsible for the management of packaging and obsolete stocks generated in the post-consumer stage. The decree establishes that manufacturers and importers must present management plans and includes requirements regarding the management of obsolete stocks and pesticide containers.
18. In this context, the Environmentally Sound Management of Pesticides, Including Persistent Organic Pollutants project was developed. It aimed to eliminate obsolete pesticide stocks, including POP and their packaging, in a safe manner and strengthen the management of the life cycle of pesticides in Uruguay. The barriers or problems addressed by the project, as well as the strategies proposed (components, outcomes and outputs) to overcome them, are presented in Figure 1.

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<sup>1</sup> These agreements include: the Basel Convention, which aims to control the cross-border movement of dangerous substances and final disposal; the Rotterdam Convention, which regulates international trade for some hazardous chemicals; the Montreal Convention, which limits the production and use of substances that damage the ozone layer; and the Stockholm Convention, which focuses on the reduction and elimination of POP.

**Figure 1. Outcomes and outputs designed to overcome the barriers identified in the project formulation phase**



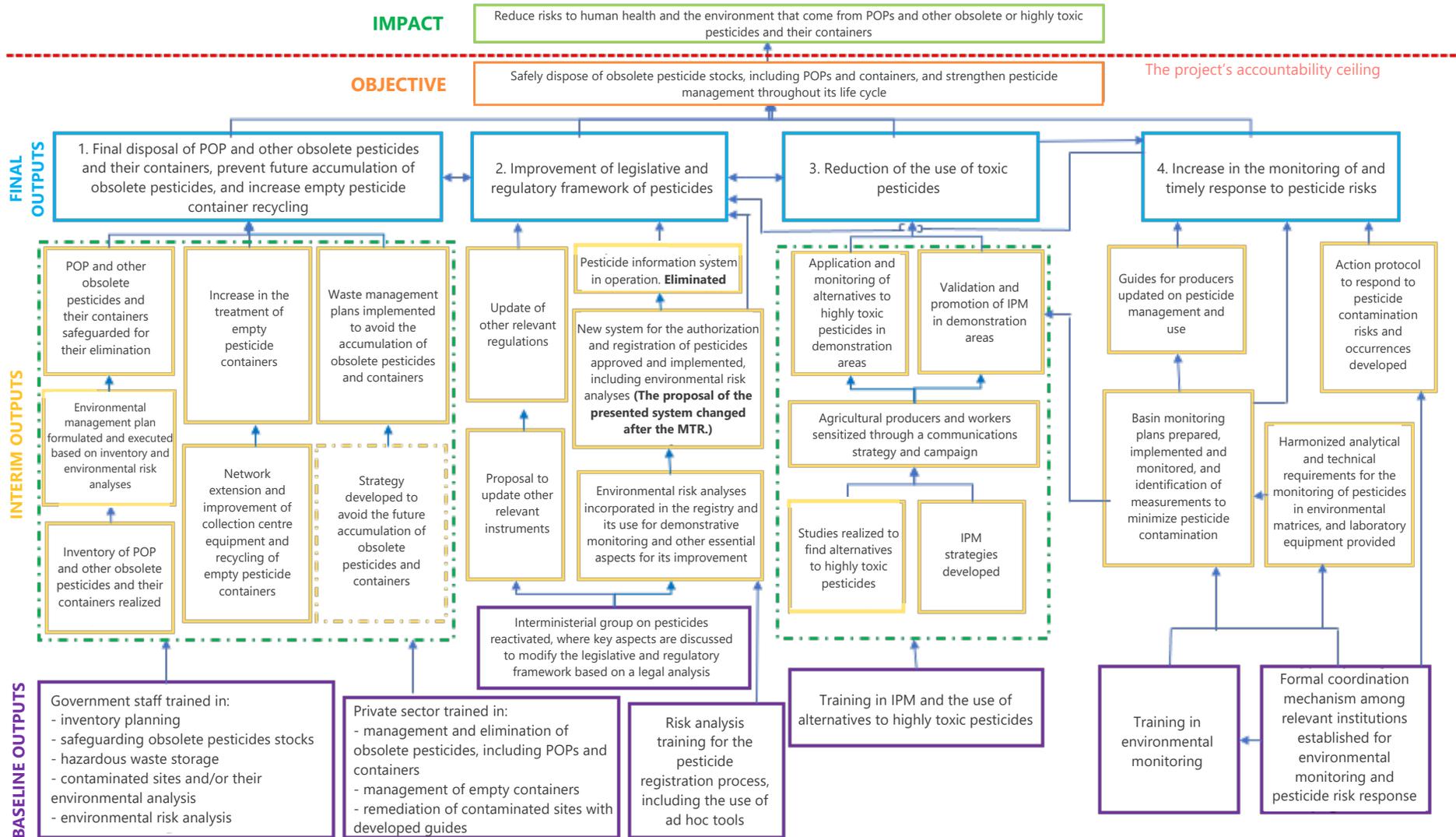
Source: Authors' own elaboration based on the project document.

19. FAO served as the implementing and executing agency of the project. In this regard, FAO, as a partner agency of the GEF, and the Ministry of Environment signed an execution agreement dated 2 July 2015. The project received a contribution from the GEF for USD 1 874 028 and co-financing of USD 7 258 000 for a total budget of USD 9 132 028. According to the project document, the Ministry of Environment was the lead executing partner and the Ministry of Livestock, Agriculture and Fisheries was the main implementing partner. As an adaptive measure, the results framework was adjusted during the development of the project. It was modified and used as a reference framework for carrying out this evaluation.

## 2.2 Theory of change

20. The Evaluation Team – based on the project document, the MTR, and initial interviews with project team members – reconstructed the project's theory of change (Figure 2). It is appropriate to mention that the MTR presented a chain of results and not a theory of change per se, which is why it was reconstructed. The theory of change was included in the evaluation inception report and reviewed by the project team.
21. In accordance with the global environmental benefits to which the project sought to contribute, the project's expected impact aimed to support the reduction of risks to human health and the environment caused by pesticides that are classified as POP and other obsolete or highly toxic pesticides and their containers. Therefore, the project proposed the objective of safely disposing of obsolete stocks and strengthening the management of pesticides throughout their life cycle. To meet its objective and contribute to the expected impact, four final outcomes were proposed, which are shown in Figure 2.
22. The main assumptions underlying the fulfilment of Outcome 1 are: 1) the private sector has the financial capacity to take charge of the management and disposal of identified stock; 2) there is national, regional or international infrastructure for stockpile disposal; and 3) the national government authorizes the management plan for the elimination of stocks and supports the private sector in carrying out the corresponding procedures.
23. The essential assumption for Outcome 2 is that there is political will from the national government to reactivate the interministerial group and that its members actively participate to achieve the required consensus. The main assumptions to obtain Outcome 3 are: 1) the awareness and training provided are effective and promote the active participation of agricultural workers and producers; 2) there are IPM strategies and viable alternatives; and 3) that increasing the awareness and capacities of rural producers, as well as strengthening the management, use and application capacities of alternatives to highly toxic pesticides are sufficient incentives for changing practices at the productive level.
24. Finally, Outcome 4 assumes that there is political will on behalf of the relevant institutions for the formal establishment of the coordination mechanism and the carrying out of joint work under this framework.

Figure 2. Project's theory of change reconstructed by the Evaluation Team



Source: Authors' own elaboration based on the project document, with modifications arising from the MTR and the initial interviews carried out.

## 3. Main findings of Phase 1

### 3.1 Relevance

**Finding 1.** The project is in line with the priorities of the national government and supports its compliance with international commitments through the reduction of risks to the health of the population and the environment, the promotion of a more efficient use of natural resources, and the strengthening of regulation on pesticides.

25. The commitment of the national government to environmental safety is reflected in the creation of the Ministry of Environment.<sup>2</sup> This seeks to prioritize the environmental issue and develop a policy that strengthens the leading role of the state in the protection of the environment in harmony with sustainable social and economic development (Ministry of Economy and Finance, 2020). In accordance with the strategic planning of the ministry, one of its objectives focuses on the promotion of sustainable production and consumption, integrating development and attention to climate change (Chamber of Representatives of the Republic, 2021, Approval Volume II Planning evaluation Part II – Institutional information, Section 36). In this regard, the project is aligned with this policy by focusing its strategy on the elimination of obsolete pesticides and strengthening the management of empty pesticide containers in order to reduce the sources of potential contamination of water and soil. The project is also aligned with the conservation and use of natural resources through the promotion of IPM and the reduction of the use of highly toxic pesticides in the main crops of Uruguay.
26. In addition, the project is aligned with the current Strategic Plan of the Ministry of Livestock, Agriculture and Fisheries (Ministry of Livestock, Agriculture and Fisheries, 2020a; 2020b), which includes, as part of the Ministry's mission, defining and executing policies that promote the sustainable development of the agricultural sector and, at the same time, seek to enhance agricultural production while promoting the sustainable and efficient use and management of resources. Also, this policy prioritizes compliance with sanitary and phytosanitary standards for national production. In this regard, the promotion of IPM, the use of alternatives to dangerous pesticides and the strengthening of pesticide regulations – supported by the project – are also aligned with the policy of the Ministry of Livestock, Agriculture and Fisheries by promoting the efficient use of resources and generating economic, environmental and social benefits.
27. In addition, the project promotes the strengthening of the regulatory framework for pesticides. This is in line with one of the objectives of the General Directorate of Agricultural Services of the Ministry of Livestock, Agriculture and Fisheries, which is to regulate and control agricultural inputs for the responsible use and care of the environment.
28. The Ministry of Public Health is the institution responsible for guaranteeing the public health of the population at the national level. As part of its functions, it is responsible for keeping a national health information and surveillance system updated, preparing and reporting vital and morbidity statistics and identifying risk situations or problems that may

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<sup>2</sup> Uruguay has had national environmental institutions since the creation of the National Institute for the Preservation of the Environment through Law No. 14 053 of 30 December 1971. The first ministry responsible for this area was the Ministry of Housing, Territorial Planning and the Environment, created by Law No. 16 112 of 30 May 1990. Until 2020, the implementation of the national environmental policy had been its responsibility. The new Ministry of Environment was created through the Urgent Consideration Law (Law No. 19 889, 2020).

affect the health of the population or risk groups, and anticipating actions for their care (Ministry of Public Health, 2021, Mission and Vision, Section 12). In this regard, the project is aligned with the Ministry's policy of prevention and management of health risks through the proposal to eliminate obsolete pesticide stocks and reduce the use of dangerous pesticides, which represent a risk to the health of the population due to their toxicity.

29. Given the priorities of the current government, it should be noted that the change of government, which occurred in 2020,<sup>3</sup> did not generate structural changes in project operation. This is because the current government also prioritizes the efficient use of natural resources and the care of human health and the environment. Therefore, the government transition only impacted the project in operational terms, delaying appointments and some of the activities that required managerial decisions at different levels of the organizations involved. Although the regulatory proposals made by the project were developed before the change of government, this did not have a significant impact on their approval. In other words, there is no evidence of progress towards the approval of the proposals during the period prior to the change of government. Nonetheless, no progress has been observed in the subsequent period either, even though, according to the interviews, the new ministerial authorities expressed greater willingness to approve the proposals.
30. The project is also in line with the Environmentally Sound Management of Pesticides programme included in the National Implementation Plan of the Stockholm Convention of Uruguay (Government of Uruguay, 2017). The programme has proposed various actions, including the review and modification of pesticide registration systems to achieve their harmonization and the application of environmental risk assessment (ERA) tools, which are both addressed in Component 2 of the project, as well as strengthening human resources capacity for pesticide monitoring (Component 4).
31. It is important to mention that, although the project remains relevant in accordance with the agricultural, health and environmental policies of Uruguay, the project partners, mainly the Ministry of Environment and the Ministry of Livestock, Agriculture and Fisheries, were unable to agree upon a common vision of the project during its implementation. This had an effect on the achievement of the project goals, as will be seen in the Effectiveness section, specifically in the Quality of execution and implementation subsection and the Factors affecting performance section.

**Finding 2.** The project is aligned with the policy of the effective and sustainable management of empty pesticide containers and with initiatives of companies, research centres and producers.

32. Campo Limpio is a civil society organization financed by around 86 companies linked to the formulation, sale and distribution of agrochemicals in Uruguay. The association's mission is to manage an efficient and effective system for collecting empty pesticide containers and their safe recycling in compliance with applicable regulations and promoting environmental sustainability. The project is aligned with this policy by including, as part of its strategy and expected outputs, the strengthening of Campo Limpio's empty packaging programme, which has a national scope (Campo Limpio, 2017).

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<sup>3</sup> The project began its execution under the government of former President Tabaré Vázquez from 2015 to 2019. Starting in the fourth year of execution, the change of government took place where President Luis Lacalle came to power for the period from 2020 to 2024.

33. Interviewed research centres (for example, the National Agricultural Research Institute [INIA, by its Spanish acronym]) and companies like Fadisol S.A.) and producers also indicated the alignment of the project with their own initiatives. This includes the promotion of cover crops and the IPM, which they have been researching or developing since before the start of the project.

**Finding 3.** The project strategy is in line with FAO priorities under Strategic Objective 2, the regional priorities of the FAO Regional Conference for Latin America and the Caribbean and with the priority on environmental sustainability of agricultural production of the Country Programming Framework.

34. The project remains aligned with FAO Strategic Objective 2 on making agriculture, forestry and fisheries more productive and sustainable, particularly through: the support provided to producers to adopt more productive, sustainable and climate-resilient practices; the compilation and distribution of information and knowledge necessary to support the transition to those practices; and support for compliance with international conventions and treaties (for example, the Stockholm Convention on Persistent Organic Pollutants). It is also consistent with FAO's Organizational Outcome 2: actors in member countries strengthen their governance – the policies, laws and management frameworks, and institutions necessary to support producers and those who manage resources – in the transition towards sustainable productive systems for the agricultural sector.
35. In addition, it remains aligned with the regional priorities agreed upon at the 36th FAO Regional Conference for Latin America and the Caribbean, which established as one of the priorities for the 2020–2021 biennium to promote agricultural, fishing, livestock and forestry production. This considers the integration of biodiversity, the maintenance of ecosystem services, and climate change mitigation and adaptation.
36. Also, it is aligned with the 2016–2020 FAO Country Programming Framework in Uruguay, specifically with Outcome 2.1, which focuses on supporting the adoption of practices that increase and improve the supply of goods and services in agricultural sector production systems in a sustainable manner, and Outcome 3.3 related to providing support to improve the technical level and efficiency of the management systems implemented for the control of agricultural health and food safety.

**Finding 4.** The project approach and strategy are aligned with the priorities of the chemicals strategic area of the GEF-5 cycle.

37. The project remains relevant to the GEF-5 cycle Strategy for Chemicals goal, which is aimed at promoting the rational management of chemicals throughout their life cycle in such a way as to minimize their significant adverse effects on human health and the global environment. To this end, the strategy establishes five outcomes, one of which is the prevention, management and elimination of POP waste, and the management of POP-contaminated sites in an environmentally sound manner. The long-term impact of the GEF interventions is to reduce human and ecosystem exposure to POP, which is aligned with the objective, outcomes and outputs established in the project results framework. The rating for the relevance criterion is satisfactory.

## 3.2 Effectiveness

38. To estimate the level of project achievement, the Evaluation Team considered an adjusted results framework. This considers changes to the project strategy that were described in the Programme Implementation Reports (PIRs) and the changes suggested by the MTR and accepted by the project, even if they were not reported in the PIRs. Thus, the adjusted results framework was taken as a reference to evaluate the level of achievement of the project.

### 3.2.1 Component 1

**Finding 5.** Progress was made in reducing the risk to human health and the environment posed by empty pesticide containers. However, the elimination of obsolete pesticides has not yet been possible.

39. Component 1 focuses on reducing stocks and eliminating obsolete pesticides and their containers, as well as strengthening the management of empty pesticide containers. Outcome 1.1 involves reducing risks to human health and the environment through the safe disposal of POP and other obsolete pesticides and by developing capacity in the remediation of pesticide-contaminated soils. Recently, there has been progress in the process that leads to the elimination of such stock.
40. The inventory of obsolete pesticides, updated as of 2020, shows the existence of 297.1 t<sup>4</sup> of obsolete pesticides, held mainly by the private sector. Of the total, 101 t of POP are identified, which correspond to 73 t of endosulfan and 28 t of pentachlorophenol. The latter is a substance for industrial use and not a pesticide. Of the total containers in this stock, 28.4 percent are damaged but without losses, 20.9 percent are in good condition but the containers are open, 20.2 percent are intact, 18.8 percent are in good condition, 1.3 percent have leaks and 0.05 percent are scattered. Also, the packaging conditions for 10 percent of stocks are unknown.
41. There is also an Obsolete Stocks Management Plan (OSMP) presented by Campo Limpio (Campo Limpio, 2017). This is an essential requirement for elimination, the authorization of which took almost two years by the Ministry of Environment. This plan provides for the elimination of obsolete items through their export to another country and the prevention of the future accumulation of such products. It was identified that this plan must be updated because it does not include the environmental risk assessment (ERA) of the sites where obsolete pesticides stocks are located. This is essential for the definition of safeguards (more details are presented in the section on environmental and social safeguards). Since the OSMP requires updating, it could also be used to include the figures for the inventory of obsolete pesticides carried out in 2020.
42. In the interviews, it was mentioned that the possibility of destroying obsolete pesticides in Uruguay is being considered. This is because a company has submitted a request for authorization to the Ministry of Environment to enable a new oven in its facilities with the capacity to eliminate dangerous substances. In this regard, it is highlighted that the project is promoting the development of national capacities for the destruction of hazardous

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<sup>4</sup> Of the total stocks, 80 percent (237.8 t) belongs to the private sector; 10 percent (30.6 t) to the National Administration of Electrical Power Plants and Transmissions (UTE); 8 percent (22.4 t) to Alcoholes del Uruguay, and the remaining 2 percent to other public institutions. Regarding the reported POPs, there are 73 t of endosulfan and 28 t of pentachlorophenol; the rest corresponds to other obsolete pesticides.

waste. If this proposal is realized, it will also be necessary to update the OSMP to include this form of elimination. It was also mentioned that, if the proposal is not viable, then the idea of exporting the stocks will be reconsidered. Given this panorama, it is expected that within the framework of the project, the stocks will be collected at a single site. This is in the process of authorization by the Ministry of Environment. The Evaluation Team recognizes the progress made in identifying the location of the stocks and, if these can be collected, the project will have contributed to reducing the environmental and health risk they represent. However, their destruction is required to completely eliminate the risk.

43. Regarding the risk level indicator of Outcome 1.1, problems are identified in its design. Although this indicator is subjective, it is not specific, measurable, achievable, relevant and time-bound (SMART) since it does not establish the parameters to determine what is a high, medium or low risk or how it can be measured. Also, the project team does not know how the baseline for the indicator was established. However, the Evaluation Team recognizes a reduction in risk due to the strengthening of Campo Limpio's empty pesticide containers plan (2017). This is because the number of empty containers that receive treatment and are collected has increased. As a result, this reduces the exposure of residents and the environment to pesticide residues. Progress is also recognized towards reducing the risk represented by obsolete pesticide stocks. This involves the identification of the main characteristics of these stocks and planning for their destruction.
44. Due to the above, the target of the GEF monitoring tool indicator on POP, which was included in the results framework and refers to the environmentally sound disposal of obsolete pesticides, has not been met. Another indicator of the tool included in the framework, which aims to ensure the budgeting and implementation of management plans, has only been partially met because the OSMP has not been implemented and requires improvement. According to the tool's rating scale, it could be assigned a value close to 2, which means infrastructure and logistics established to allow implementation.
45. The project strengthened the management of empty pesticide containers by expanding the number of empty container collection centres from 8 to 17 and by providing them with equipment to improve their operation, as well as implementing a mobile collection centre to collect the containers in areas far from the centres. In this regard, the project has contributed to reducing the risk posed by empty pesticide containers by increasing the percentage of containers that are washed and recycled.

**Finding 6.** Capacity building in the public and private sector on the management of obsolete pesticides has not been achieved because the topic was replaced. Capacity building in the public sector on contaminated sites is also pending.

46. The training of trainers from the Ministry of Livestock, Agriculture and Fisheries and the Ministry of Environment on the safe handling of obsolete pesticides and the environmental analysis of contaminated sites – who in turn would train other public officials and representatives of agrochemicals companies and producers on these topics (Output 1.1.2) – was not carried out. Among the reasons was that it was not possible to secure an international consultant to provide training on environmental management toolkits for obsolete pesticides. In addition, it was indicated that the private sector (Campo Limpio) informed the project that it was not necessary to train its personnel on the subject because it already had specialists who train workers in product safety. Additionally, Campo Limpio indicated that it was planning to hire a company specialized in the management of

hazardous waste for the elimination of obsolete pesticides for which the staff's expertise in this matter would be a requirement of the contract.

47. The Evaluation Team was informed that this decision was part of the adaptive management of the project. However, this decision did not consider the usefulness of training for government and Campo Limpio personnel who would be in charge of supervising the obsolete stocks management process and, in general, the execution of the OSMP. As mentioned, this plan does not include ERA, which is one of the first actions recommended in environmental management toolkits for obsolete pesticides (FAO, 2009a; 2009b; 2011a; 2011b).
48. The project team decided to change the topic of the training, which was mainly oriented towards the safe and responsible handling of pesticides for agricultural use based on the Guide to the Prevention of Incidents and Accidents in the Handling of Pesticides in Extensive Agriculture, Horticulture and Forestry (FAO, 2019) developed by the project. The target audience for the training was also expanded to include students from agricultural schools and the Technological University, who ultimately constituted most of the participants.
49. It is important to note that this document is not a guide to the management of obsolete pesticides since it only defines them and provides recommendations to avoid their generation and for the storage of existing stock, highlighting that Campo Limpio is responsible for an OSMP. In this regard, the guide differs substantially from the outdated FAO environmental management toolkits for pesticides (FAO, 2009a; 2009b; 2011a; 2011b) as it has a different objective. It was noted that this change in topic and target audience was not formally reported in the PIR. In addition, this guide also represents the instrument created by the project to strengthen the capacities of the private sector in the management of local contamination (Outcome 1.2).

### 3.2.2 Component 2

**Finding 7.** The project has generated regulatory proposals that cover five stages of the life cycle of pesticides and has submitted them for consideration by the competent authorities. Although the proposals have not been approved, it is reported that some of them have been adopted by the participating institutions.

50. The outcomes and outputs of Component 2 focus on updating the legal framework and increasing capacities for the registration of pesticides. Thus, the project developed proposals for updates and new regulations that cover the five stages of the life cycle of pesticides.<sup>5</sup>
51. These proposals were submitted to the Ministry of Environment, the Ministry of Livestock, Agriculture and Fisheries, and the Ministry of Public Health. In the case of the Ministry of Environment and the Ministry of Public Health, which played an active role in their preparation, the proposals are in the review process or are pending the reactivation of

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<sup>5</sup> The proposals are: 1) **use and application**, which focused on a proposal to ensure the regular maintenance of pesticide application equipment; 2) **storage**, which is aimed at ensuring the environmentally safe storage of pesticides; 3) **transportation**, which is aimed at strengthening regulations on the transportation of dangerous substances, including some specific recommendations for pesticides; 4) **importation**, which was presented to improve the pesticide registration system; and 5) **monitoring**, which, together with the Ministry of Public Health, involved a proposal for eight pesticide biomarkers in human matrices to identify 31 active ingredients and a proposal for a surveillance system for workers exposed to pesticides.

working groups focused on this topic.<sup>6</sup> In particular, the Ministry of Environment noted that the proposed regulations on pesticide storage were used to establish the requirements for the site where obsolete pesticides will be temporarily stored before they are destroyed.

52. For its part, the Ministry of Livestock, Agriculture and Fisheries has confirmed receipt of the proposal on pesticide application equipment and raised some issues regarding the proposal to strengthen the pesticide registration system. Ministry officials have mentioned that the proposal for the registration system should consider the progress that the country has made on this subject, even though they also indicated their agreement with some aspects that have begun the integration process. The Ministry of Environment has highlighted the relevance and importance of the proposal to strengthen the environmental aspect of the registry. For its part, representatives of the private sector recognize the need to update the registry but have different opinions on the magnitude of the changes required. They agreed that the project has provided a space to start this discussion. To date, however, no regulations have been approved, as required by the target of the indicator proposed for this outcome (Outcome 2.1).
53. An ERA proposal was also incorporated into the pesticide registration system proposal, which is one of the main elements that were considered to strengthen the registration system. Regarding the other outputs linked to the ERA, which included the implementation of a pilot project to test and strengthen the proposal, as well as related training for the personnel of the Ministry of Livestock, Agriculture and Fisheries and the Ministry of Environment, these were not achieved since they depend on the approval of the registration system proposal.
54. Thus, the target of Indicator 1.4.2.3 of the GEF monitoring tool, which corresponds to the only outcome of this component (Outcome 2.1), has not yet been achieved since its goal is to have regulation with a corresponding budget that implies its prior approval. Since there is no formal report on the monitoring tool, it is difficult to determine the basis of the baseline established for that indicator, which was assigned a value of 2. This means that the regulation was adopted but without support. If the current situation is considered, a value of 1 could be assigned since the regulation is under review. Regarding this indicator, the PCU stated in the 2021 PIR that its responsibility is limited to generating regulatory proposals. This is why it has reported the goal of the indicator as being met. In this regard, it is appropriate to point out that the PCU has executing institutional partners, such as the Ministry of Environment, the Ministry of Public Health and the Ministry of Livestock, Agriculture and Fisheries, which have the required powers to promote the approval of these regulations.

### 3.2.3 Component 3

**Finding 8.** The project has contributed to the generating and testing of the IPM strategies and alternatives to replace dangerous pesticides, which have proven to be effective. However, training and awareness raising actions to promote their dissemination and adoption faced methodological limitations.

55. This component involves reducing the use of toxic pesticides through the adoption of the IPM practices and other alternatives. In this regard, two outcomes are proposed. Regarding

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<sup>6</sup> In particular, the Ministry of Public Health indicated in a meeting of the project steering committee that the work on biomarkers would be raised in the National Commission on Environmental Pollutants to consider the development of guidelines and standards that reduce health risks regarding the use of pesticides.

- the first (Outcome 3.1), three IPM strategies and other alternatives were satisfactorily evaluated for main crops in Uruguay like soybeans, which were developed on demonstration farms.<sup>7</sup> In addition, the validation of two biological control strategies was supported to reduce or replace the use of pesticides<sup>8</sup> like imidacloprid, thiamethoxam, cypermethrin, fipronil and bifenthrin, which are moderately dangerous (Category 2).
56. As part of this outcome, the project document also includes the training of workers and producers in these practices to promote their dissemination and adoption through the use of demonstration farms. However, project execution lacked plan or programme development. This would have accounted for the strategy and tools to be used to provide the training,<sup>9</sup> meaning there was no solid methodological basis for its development.
57. It was also identified that capacity development was not based on a structured and focused process, and it was found that 27 activities were carried out – reaching a total of 1 246 people. Of these, only four activities were exclusively aimed at producers and agricultural workers (who were the target audience), reaching a total of 85 people. Other activities brought together producers, technicians and academics. This included activities exclusively for academics or technicians, and activities in which training was provided jointly to producers and academics.
58. A mix of training and dissemination modalities was also identified. This included formal training courses with a summative evaluation, seminars and field talks. Some of the dissemination activities included theoretical sessions and others only the field talks. These activities were mostly agreed upon in letter of agreement (LOA) arrangements, with the main objective of carrying out research or the validation of the IPM practices with the added commitment of disseminating their results. A good practice implemented by the project consisted of hiring local actors. In this case, universities and government research centres provide training. This continues to disseminate the validated practices.
59. Although the identification of the IPM practices and alternatives to toxic pesticides represents progress towards reducing the use of toxic pesticides, the project has not been able to demonstrate progress in meeting the outcome goal to reduce the use of pesticides by 200 t. It is considered that the project could have carried out a survey of knowledge, attitudes and practices before and after the training to measure its effect and the probable

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<sup>7</sup> The strategies were: 1) pest management in soybean crops through biological control and the use of cover crops, which, as reported, reduced the use of insecticides in the crop cycle by up to 12 percent; 2) alternatives for weed management through cover crops (achieving between 84 and 91 percent of weed control) and rolling as a mechanical tool for their desiccation, with reported results equivalent to the use of control with pesticides; and 3) use of pesticide substitution tools for the fruit sector, such as mass trapping, mechanical weed control and the use of weeds, among others. As an additional management strategy, the effectiveness and efficiency of biobeds for the treatment of residues from pesticide applications in horticulture and fruit growing were also evaluated.

<sup>8</sup> The strategies consisted of support for the approval of a bioantidote that can replace the use of cypermethrin, imidacloprid and fipronil (all Category 2). The other is a bioinput of *Trichogramma*, which parasitizes eggs of other pest insects and therefore replaces the use of thiamethoxam and bifenthrin, which are moderately dangerous (Category 2).

<sup>9</sup> According to the teaching materials and practical tools that FAO has developed on capacity building, the development of a training programme or plan should include the analysis of the characteristics of the producers and workers to be trained. This would allow for getting to know their profile, interests and level of motivation to participate in the training seminars. Based on this information, the training format and the tools to be used should be designed. According to FAO (2021a), it has been shown that learning is not applied or transferred by participants who do not have the ideal profile. These good practices are reported in (FAO, 2023a).

reduction in the use of pesticides. In addition, if the project team was not in agreement with the indicator or target, the respective changes to the results framework could have been proposed to the project steering committee and the FAO-GEF Liaison Officer. Even so, the project reports that the implemented practices and alternatives have the potential to reduce pesticide use by more than 200 t if applied at the national level.

60. The second outcome (Outcome 3.2) involves increasing awareness about the effects of pesticides and disseminating good practices through a communications strategy aimed at different target audiences (for example, rural schools, producer organizations, local communities and the general public). In this regard, the communications strategy was not developed and, like the training programme, this activity shows areas for improvement in its design and execution. The project reports different activities that include formal training courses carried out through consultancies<sup>10</sup> and dissemination activities from the research centres or other partners like the General Directorate of Farms. Besides generating technical inputs, this entity is responsible for the dissemination of results and the development of communications materials, such as videos or brochures.
61. The project reports that there is sufficient evidence to affirm, mainly based on the perception of key informants, that there has been an increase in the level of awareness among producers, academia and other actors about pesticides, their effects and alternatives. The methodology used to reach this conclusion consisted of interviewing 12 people about their perception on the increase in awareness. Seven of those interviewed were researchers who were hired by the project to carry out some related activity, while only a couple of producers were interviewed. In this regard, the methodology used to reach this conclusion is considered weak because: i) the majority of those interviewed were hired by the project to implement certain activities and, through this study, they were asked to evaluate activities in which some of them were directly involved, so there is the possibility of unintentional bias; ii) the questions asked of the people interviewed were not adequately focused; and iii) the interview process did not incorporate the target audience indicated in the project document, which were producers and government personnel. Furthermore, the project team did not know how the baseline indicator for that result was determined. Due to the above, the Evaluation Team considers that a more robust study could have been carried out to measure the indicator.
62. According to the MTR, the semi-annual and annual progress reports and the interviews, it was also found that the Ministry of Environment and the Ministry of Livestock, Agriculture and Fisheries did not adopt a shared communications strategy related to the project. This is because they were unable to agree on a common position that included the productive vision and environmental protection. This situation prevented the hiring of a communications expert, who could have helped provide greater visibility to the project.

### 3.2.4 Component 4

**Finding 9.** The analytical capacities of the laboratories of the Ministry of Environment and the Ministry of Livestock, Agriculture and Fisheries have been strengthened and capacities developed in both institutions to monitor pesticides. Progress was also made in the environmental monitoring

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<sup>10</sup> Regarding the course on pesticide application technologies, which sought to strengthen the role of technicians for better dissemination of these technologies among producers and applicators, it was found that in its two editions (2018 and 2019) there were very few participants who had the role of recommending methods of application, review and the regulation of equipment.

of priority basins, even though it was not possible to do so through harmonized technical requirements and interinstitutional coordination.

**Finding 10.** The project provided greater visibility to the work of the Ministry of Environment's laboratory, which also led to improvements in its facilities and greater recognition of the importance of its work. This is considered a co-benefit generated by the project.

63. Component 4 focuses on increasing capacity for monitoring and improving the response to pesticide contamination events. The strategy of this component, according to the project document, is based primarily on the creation of a coordination mechanism between the Ministry of Livestock, Agriculture and Fisheries, the Ministry of Environment, and academic and research institutions and departmental governments. It was expected that, under this mechanism, three monitoring plans would be defined in priority hydrographic basins, work would be done on the development of harmonized technical and analytical requirements, and capacities would be strengthened regarding the main needs of the institutions.
64. In this regard, an agreement was signed between the Ministry of Environment and the Faculty of Chemistry of the University of the Republic to develop methods and the analysis of POP in sediments. However, the project document indicated that it was necessary to establish coordination with only two of the seven actors. This is especially relevant since the project document indicates that one of the main obstacles in the environmentally sound management of pesticides is the poor exchange of information and coordination between the relevant institutions. In fact, this is why a broader agreement was warranted.
65. In this regard, progress was made towards this objective. For example, because of the project, the laboratory of the General Directorate of Agricultural Services began to participate more actively in the network of laboratories created by the National Directorate of the Environment (today, the National Directorate of Quality and Environmental Assessment). Furthermore, in a specific initiative promoted by the laboratories of the General Directorate of Agricultural Services and the National Directorate of the Environment (today the National Directorate of Quality and Environmental Assessment), support was provided to three private laboratories for expanding the range of options at the private level that comply with standards recognized by the National Directorate of Quality and Environmental Assessment and the General Directorate of Agricultural Services. This can also provide support in the event of contingencies affecting these institutions.
66. Additionally, progress was made in the proposal for a work agreement between the General Directorate of Agricultural Services of the Ministry of Livestock, Agriculture and Fisheries, the Uruguayan Accreditation Body (OUA, by its Spanish acronym) and the National Directorate of Quality and Environmental Assessment of the Ministry of Environment for the creation of a technical committee to assist private laboratories in the management and improvement of analytical procedures and the development of joint guidelines or technical notes. However, the OUA stated that it lacks the resources to pursue the proposal.
67. Progress also lacked in the strengthening and implementation of a system for responding to complaints related to events linked to pesticides in the Ministry of Environment. However, it is understood that the strengthening of analytical capacities contributes to the analysis of more pesticides that could be linked to these events. This is discussed in the next paragraph.

68. Progress was made in strengthening the analytical capacities of the laboratories of the Ministry of Livestock, Agriculture and Fisheries and the Ministry of Environment. In particular, the standardization of multiresidue pesticide tests in environmental, biological and food matrices was achieved in preparing for ISO/IEC 17025 laboratory accreditation. This contributed directly to strengthening the analytical capabilities of both laboratories. For example, the laboratory of the Ministry of Environment went from analysing 9 pesticides to 100. As for the laboratory of the Ministry of Livestock, Agriculture and Fisheries, it went from analysing 78 pesticides to 134. In the interviews, it was mentioned that both laboratories maintained constant communication to exchange experiences and knowledge about the use of analytical equipment. In the case of the Ministry of Environment laboratory, it was reported that the project provided greater visibility to its work. This also led to improvements in its facilities and greater recognition of the importance of its work, which is considered a co-benefit generated by the project.
69. It is understood that the standardization of methods or techniques is an element that facilitates or contributes to the harmonization of procedures. However, standardization per se does not imply coordination or harmonization. In this regard, harmonization and standardization are two different yet related concepts.
70. Environmental monitoring of one of the three committed basins was achieved, but no progress was made in the harmonization of technical requirements for its implementation. In fact, this had been planned in the project document to address the problems of institutional coordination and the lack of information exchange. The monitoring was carried out in the Laguna del Cisne basin (Canelones) and covered three environmental matrices: water; sediments; and fish. The process to monitor the second basin, the San Salvador River (Soriano) (FAO, 2022), also began. This was delayed as a result of the lack of resources due to the COVID-19 pandemic. The unilateral trust fund (UTF) resources that had been committed since the beginning of the project will be used to continue monitoring the two remaining basins and meet the goal.
71. Regarding training in the environmental monitoring of pesticides, it was found that no formal training was carried out as anticipated in the project document. Rather, constant technical advice was provided to prepare the two laboratories for their respective accreditation. Two workshops and a seminar were held to address specific topics (for example, Simulated Audit of the European Union for Pesticides and The Interpretation of Laboratory Results and Decision-making in the Context of Uncertainty). Those interviewed noted that they did not receive training. Instead, they received technical advice during the accreditation process. Regardless, they do recognize the knowledge and experience gained by their staff during the process. This means that their monitoring capabilities were strengthened.
72. As in the case of the risk level indicator for Outcome 1.1, the capability level indicator for Outcome 4.1 presents the same design problems. The indicator is not SMART and the project team does not know how the baseline was prepared, so it has made a qualitative estimate to determine that there has been an increase in the level of monitoring capabilities. This increase in capabilities due to the improvements discussed in the previous paragraphs is recognized.

**Finding 11.** Through an LOA with the University of the Republic, the project achieved strong support from academia and research institutions – especially for the promotion of the IPM and environmental monitoring.

73. The University of the Republic, through the Faculties of Agronomy, Chemistry, Medicine and the Eastern Regional University Centre, was actively involved in the project alongside the INIA. In all cases, participation was formalized through the LOA in the areas of research experience of each institution and based on the needs of the project.<sup>11</sup> In this regard, the project drew on existing developments and capacities at the national level, while also strengthening them. This provided both resources and adequate opportunities for experimentation in key areas of interest of the project. Also, this allowed the involved academic institutions to advance more quickly in their own research.

*The rating for the effectiveness criterion is moderately unsatisfactory.*<sup>12</sup>

### 3.3 Progress towards impact

**Finding 12.** The project has achieved progress that reflects a management approach based on the life cycle of pesticides. This must be strengthened to establish a solid foundation that leads to a reduced pesticide risk of mainly obsolete stocks – including POP.

74. The project has contributed to reducing the risk that empty pesticide containers represent to the population and the environment through increased treatment and recycling. This reduces the risk of exposure of the population to the pesticide residues in the containers and prevents the contamination of water and soil by these residues. However, there is still a need to eliminate obsolete pesticide stocks – including POP and their containers – which represent a greater risk to human health and the environment. There is still no clarity regarding whether the elimination will be carried out in the country or if the obsolete stocks will be exported. In any case, the OSMP authorized for the destruction of these stocks need to be updated, as stated in the previous section. The elimination of these obsolete pesticides represents the main overall environmental benefit expected from the project. Although this benefit has not been achieved, it should be achieved in the future as it is a legal responsibility of the private sector.
75. As stated in the previous section, the goals of the three indicators of the GEF monitoring tool for POP, which are included in the results framework, have not been fully met. These indicators imply the elimination of obsolete pesticides, the development and

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<sup>11</sup> The Faculty of Agronomy mainly participated in validation activities of the IPM strategies, biological control agents and the agroecological management of production systems and other techniques for pest control in soybeans. The Faculty of Chemistry joined the project to evaluate biobeds for the bioremediation of agrochemicals in fruit and vegetable production. In the cases of both faculties, the validation studies were carried out on pilot farms, mostly in conjunction with the producers who lent their establishments for this purpose. The Faculty of Medicine contributed to the project through proposals to the Ministry of Health for a National Surveillance Programme for workers exposed to agricultural pesticides and for monitoring human exposure to pesticides through biomarkers (for example, glyphosate), which have not been approved by the relevant authorities. As a result of the project, the health and environmental toxicology module of the medicine degree was updated. The role of INIA was to estimate the potential reduction of herbicide use through cover crops and rolling as a desiccation method, as well as the construction of a biobed at the Las Brujas experimental station. Through the Eastern Regional University Centre, the Pesticide Monitoring Programme was executed in the Laguna del Cisne basin. This project was carried out together with other institutions and the laboratories of the National Directorate of Quality and Environmental Evaluation and the Ministry of Livestock, Agriculture and Fishing.

<sup>12</sup> The criterion was revised as part of the update (Phase 2 of the evaluation) and the related analysis can be consulted in Section 4.

implementation of a management plan to prevent the future accumulation of obsolete items, and regulation accompanied by a budget allocation. It is important to mention that the indicators of the monitoring tool measure progress in achieving the impacts and results established by the GEF in its project portfolio. Here, it involves the projects in the chemicals and waste focal area.

76. It is important to note that the project has triggered the interest of the business and public sector in developing the necessary infrastructure for the destruction of obsolete pesticides in the country and of hazardous waste in general. If the company's authorization to eliminate this type of waste is obtained, then the project will have generated a co-benefit. This is because it was not contemplated to develop a local solution, which is of great importance for the management of hazardous waste in the country. This initiative is in its initial phase.
77. Changes to the results framework have decreased the scope of the project. If follow-up actions are not implemented once the project ends, then the expected impact could be affected. For example, the project's initial objective of developing a strengthened and implemented pesticide registration system was limited to the presentation of a proposal, making continued progress essential for its authorization and execution.
78. Progress was also made in strengthening the environmental aspect of the registry, but it was not possible to pilot the ERA proposal or provide training in this regard. This limitation could also affect the impact of the project given the importance of the registration system in encouraging the use of less toxic pesticides and promoting the use of alternatives to highly toxic pesticides.
79. It is important to mention that the UTF resources will be used to monitor the two missing basins and meet the goal established by the project, which is part of the government's commitment to this project.
80. The project does not have measurements to determine compliance with some of its outcomes (Outcome 3.1) and the reported measurements are methodologically weak (Outcome 3.2). This hinders a more precise assessment of the impact of the project. In this regard, the project has established foundations that will require continued progress to achieve the desired impacts.

*The rating for the progress towards impact criterion is moderately unsatisfactory.<sup>13</sup>*

### **3.4 Efficiency**

**Finding 13.** The project execution schedule was extended by more than two years in response to the institutional and administrative challenges resulting from the COVID-19 pandemic. As of December 2020, the project had executed 88 percent of the budget, and its completion date was extended until December 2021.

81. The project received a contribution from the GEF for its implementation of USD 1 874 028. This joined the contribution of the executing partners (co-financing), which corresponds to USD 7 258 000, so the total amount of the project amounts to USD 9 132 028. According

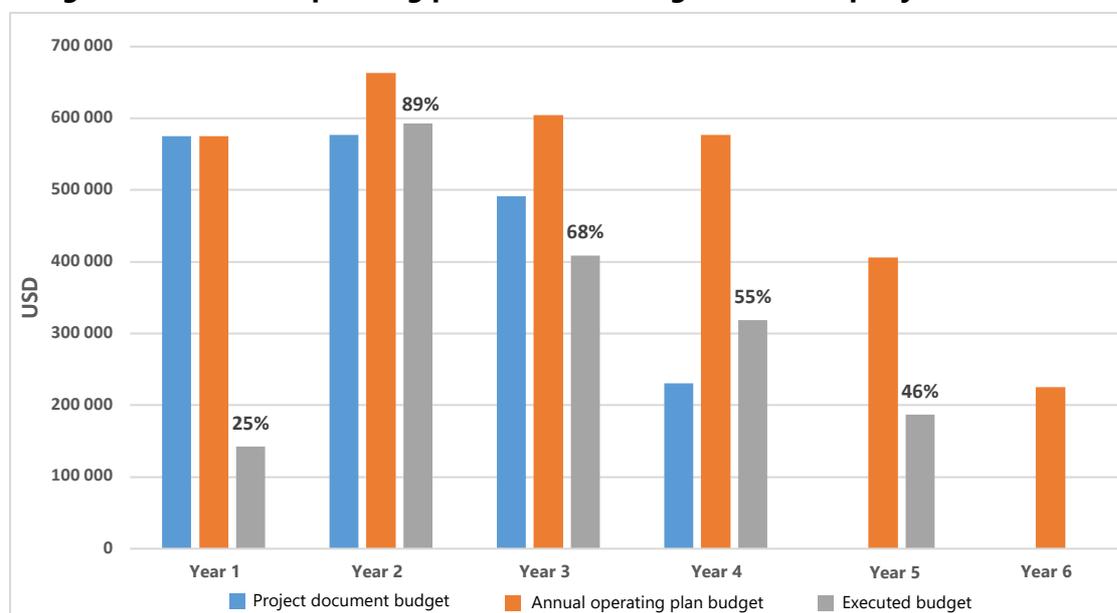
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<sup>13</sup> The criterion was revised as part of the update (evaluation Phase 2), and the related analysis can be consulted in Section 4.

to the data provided, the GEF budget execution was at USD 1 649 198 as of December 2020. This means that 88 percent of the budget has been executed.

82. In order to analyse the cost efficiency and punctuality in meeting the deadlines established in the project document, Figure 3 presents the comparison between the budget indicated in the project document, the budget in the annual operational plan and approved by the project steering committee, and the executed budget by year. As seen in the figure, in year one the project had a low budget execution – 25 percent of the planned budget was spent. This underexecution was due to the time invested in formal administrative processes once the GEF project approval was obtained,<sup>14</sup> the delay in hiring the National Project Coordinator, and the time invested in the planning process that precedes budget execution. Thus, the project began with a delay of nine months. In year two, the project had greater momentum and a higher level of execution.
83. However, in the following three years, there was a budget underexecution that increased until reaching 46 percent of what was planned in 2020. This underexecution is mainly the result of the difficulties faced by the project in reaching agreements on the activities to be implemented – due in part to the lack of a common vision among its partners (for further details, see the section on the Quality of implementation and execution). It is also a consequence of the time involved in some processes of hiring consultants and reviewing the terms of reference and outputs, which, in some cases, were very extensive (for example, the hiring of an international consultant to strengthen the laboratories took eight months). In addition, the change of government at the beginning of 2020 also delayed the project due to the lack of decision-making on the activities to be carried out that year.

**Figure 3. Comparison of the budget indicated in the project document with the planned budget in the annual operating plans and the budget executed per year**

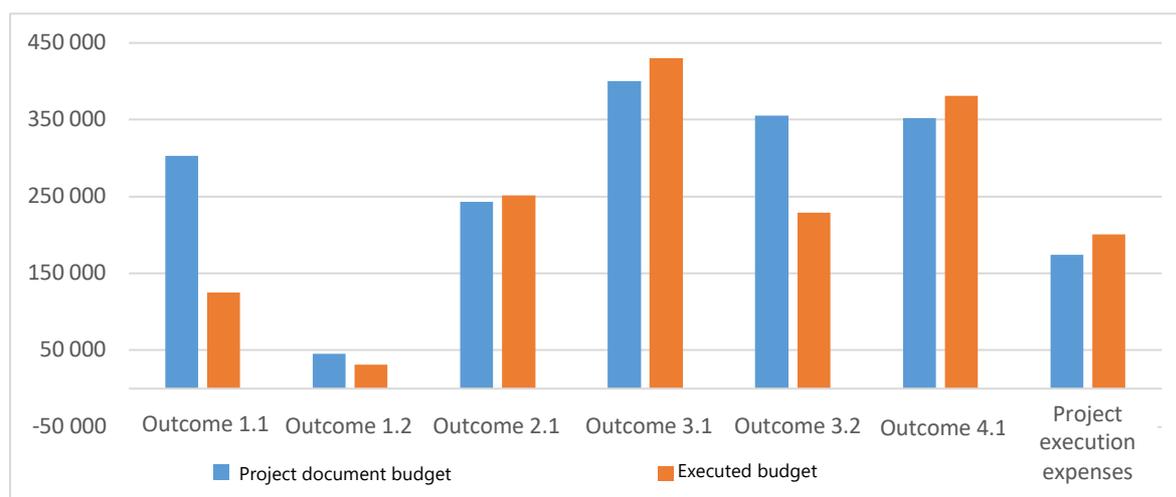


Source: Authors’ own elaboration.

<sup>14</sup> The GEF approval of the project occurred in July 2015. However, according to the interviews and the information reported in the first project progress report (PPR), the project began its activities in April 2016 once the National Project Coordinator had been hired.

84. In this regard, the deadline established in the project document for the execution of the project was not met. The project was granted four extensions. Initially, it was extended for one year in response to the recommendation of the MTR with an end date in July 2020. Subsequently, it was reported in the 2020 PIR and in the second semi-annual progress report of 2019 that the end date would be extended until December 2020 due to the need to achieve important outcomes and deliverables (for example, the approval of proposed regulations). In that same PIR, it was reported that, due to the COVID-19 pandemic, the GEF had granted an extension for three additional months, so the new end date would be March 2021. During the evaluation, it was noted that another extension had been requested until December 2021. If April 2016 is considered as the actual start date of project activities, this means that the project had a total extension of two years and eight months. These extensions increased the costs of supervision and administration of the project, which were scheduled for a four-year execution. As a result, the project reported a 15 percent increase in administration expenses (Figure 4).
85. Regarding the use of the budget by project outcome (Figure 4), it is observed that Outcome 1.1 had a lower expense in relation to what was planned in the project document. This is explained due to the budget allocated to support the destruction of the obsolete pesticide stocks and their containers, which remain in the possession of a public institution. Outcomes 1.2 and 3.2 also presented a lower expense. Outcomes 2.1, 3.1 and 4.1 showed a slight increase in budget execution, which ranged between 3 and 8 percent.
86. The COVID-19 pandemic led to budget reductions in the ministries. This is why the Ministry of Environment faced challenges in providing the committed resources through the UTF project for the monitoring of three priority basins. As a result, only one basin has been monitored so far. More information about the UTF is provided in the Co-financing section. Another effect of the COVID-19 pandemic on the project had to do with the use of virtual platforms to carry out the training courses and seminars.
87. *The rating for the efficiency criterion is moderately unsatisfactory.*<sup>15</sup>

**Figure 4. Budget execution by outcome**



Source: Authors' own elaboration.

<sup>15</sup> The criterion was revised as part of the update (evaluation Phase 2). The related analysis can be consulted in Section 4.

## 3.5 Sustainability

### 3.5.1 Environmental and social sustainability

**Finding 14.** It was possible to reduce the risk that empty pesticide containers represent to the population and the environment due to the strengthening of its collection and storage programme. Also, there have been replicas of the biobeds. These contribute to this reduction in risk. It is considered that this benefit will remain after project closure.

**Finding 15.** Progress has been made to reduce the risk posed by obsolete pesticide stocks. However, because their collection and disposal have not yet been carried out, the risk to human health and the environment remains.

88. The social and environmental benefit to which the project has contributed is the reduction of direct exposure of the population and the environment to pesticide residue contained in empty containers. Campo Limpio's execution of its management plan for empty pesticide containers, which was authorized in 2013, was strengthened with the support of the project. This benefit will continue once the project has ended due to the legal mandate that the private sector has to take responsibility for the management of empty pesticide containers, which is based on Decree 152/2013 (Ministry of Housing, Territorial Planning and Environment, 2013).
89. The project also made progress in carrying out an inventory and characterizing the obsolete pesticide stocks and their containers in the country. It has supported the development of the OSMP, which will have to be updated and subsequently implemented. The 271 t of obsolete pesticides and their containers, including 73 t of endosulfan, have not been destroyed since the OSMP has not been executed.
90. This means that the environmental and social benefit of reducing the risk posed by obsolete pesticides has not been achieved. This also means that the risk of exposure of the population and the environment to these pesticides remains. The project has taken important steps to achieve these benefits and, if stocks are collected in a temporary collection centre within the framework of the project, it will have directly contributed to minimizing the risk.
91. This situation is made more complex since training on the management of obsolete pesticides was not provided and capacities were not developed on this in the government and private sectors. Instead, the training provided was aimed mainly at students and producers, focusing on the prevention of incidents and accidents during the use of pesticides.
92. Strengthening the regulation of pesticides throughout their life cycle would also be expected to contribute to the benefit of reducing risks to the population and the environment. Although some components are already being used, there is a need to provide follow-up to ensure their full implementation and sustainability since the regulatory proposals are still in the review process. According to the information provided by the project, the proposed regulations on the storage of pesticides were used to establish the requirements that would allow for the authorization of the obsolete pesticide temporary collection centre. Also, the Ministry of Livestock, Agriculture and Fisheries has indicated that it has begun to implement some aspects of the proposed pesticide registration system.

93. Specific benefits were generated for the nine producers<sup>16</sup> that participated in the evaluation of the IPM practices and alternatives to dangerous pesticides by reducing the use of pesticides and the loss of crops on their properties. However, this benefit has not been quantified by the project based on the Outcome 3.1 indicator on reducing the use of toxic pesticides through the adoption of the IPM and other alternatives. During the evaluation, it was not possible to interview more producers or analyse the results of the training and awareness raising actions since the information collection phase was carried out virtually. However, the producers interviewed and those who participated at the demonstration farms stated that they had knowledge about the IPM before the project and are aware of its benefits.
94. It is important to mention that there was a strengthening of capacities among those who participated in the process of evaluating alternatives. In the interviews they stated that, although they had already been using the IPM in their crops, the project allowed them to resume practices that do not involve the application of pesticides.
95. The project recently measured the level of awareness generated through dissemination activities about the risks of pesticides and good practices for their use. However, the applied methodology presents areas for improvement and must be strengthened for its results to be considered valid (the Effectiveness section provides more details on this).
96. In relation to other project activities designed to generate environmental benefits, it is important to highlight the installation of two demonstration biobeds. This represents an effective alternative to reduce pesticide contamination and its related risks. Producers interviewed by the Evaluation Team indicated their satisfaction with the performance of the beds and will continue to use them. In addition, the project reported that, due to the positive results obtained, two other beds were installed in the viticulture sector within the framework of a project carried out by INIA, together with the Uruguayan Federation of Regional Agricultural Experimentation Centres and the General Directorate of Farms. The INIA continues to promote biobeds through virtual conferences in which their operation and benefits are explained. In addition, the construction of a bed is planned at its Las Brujas experimental station to continue its line of research and dissemination among producers. It was also reported that two more beds were installed in Juanico and that their number is expected to grow. This tool is therefore in its initial stages of scaling up due to its positive reception and continuing dissemination by the Faculty of Chemistry at the University of the Republic, the General Directorate of Farms and INIA.
97. The evaluated IPM practices and alternatives to toxic pesticides were expected to reduce the risks of environmental contamination associated with their use. As mentioned, the promotion and adoption of these practices and alternatives has faced limitations. Although the project steering committee requested that the PCU put together a strategy proposal for each productive sector to be implemented in 2019 in order to achieve ownership by producers of the practices tested on the demonstration properties (Project Steering Committee, 2018), there is no evidence that this strategy has been developed.

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<sup>16</sup> In total, nine agricultural holdings that belong to producers participated in validating the practices.

### 3.5.2 Institutional sustainability

**Finding 16.** Since the capacities generated in environmental monitoring will remain after project closure, no institutional risks are identified that could affect its sustainability. This is due to its level of ownership by the participants.

98. The project generated analytical and personnel capacities in the laboratories of the Ministry of Livestock, Agriculture and Fisheries and the Ministry of Environment. In particular, the project effectively contributed to the certification of both laboratories in the ISO/IEC 17025 standard and to the increase of their capacity to analyse a greater number of pesticides and the monitoring skills of their staff. According to the interviews, this represents a significant contribution to strengthening the environmental monitoring of pesticides at the institutional level and, in the case of the Ministry of Environment laboratory, giving greater visibility to its work and gaining greater experience in basin sampling.

**Finding 17.** The evaluation identified a high degree of ownership of validated practices and alternatives to toxic pesticides by academic and government research institutes, and their promotion is expected to continue after project closure.

99. The academic and government research centres that participated in the project recognize the impetus provided by the project on these topics and continue to disseminate validated practices. For example, INIA and the University of the Republic both have key lines of research in these areas. In particular, the project reported that the Faculty of Agronomy integrated information on validated practices into its training programme for agricultural engineers. Also, capacities were developed in terms of the training of human resources and collaborations with universities abroad. This is considered a co-benefit of the project since it was not planned.

100. The Ministry of Livestock, Agriculture and Fisheries also carries out tasks to promote the IPM and alternatives to dangerous pesticides. Further, it participated in the training activities through the General Directorate of Farms. Therefore, continuity in the diffusion of such promotion would be expected. However, the project document indicated the need for a greater collaborative effort between the Ministry of Environment and other organizational units of the Ministry of Livestock, Agriculture and Fisheries, such as the General Directorate of Agricultural Services and the Directorate of Renewable Natural Resources to promote greater ownership. The continued dissemination of practices by the General Directorate of Farms, the University of the Republic and INIA will lead to greater ownership by producers.

101. The private sector also played an important role in carrying out field validations of practices and alternatives and supporting their dissemination, working together with the University of the Republic and INIA. The project document envisaged greater participation by environmental civil society organizations in disseminating the practices. This, however, was not achieved (for further details see the section on Stakeholder engagement).

**Finding 18.** The co-financing provided by government actors and the interest of the new government authorities in addressing the issue of comprehensive pesticide management is a positive aspect for the sustainability of the project's achievements and the future scope of the expected impacts.

102. The co-financing provided by government actors is a positive aspect for the sustainability of achievements, which will require the commitment of government authorities and FAO to provide the respective monitoring. According to the project and some press releases on

the subject, the new authorities of the Ministry of Livestock, Agriculture and Fisheries and the Ministry of Environment have shown greater availability and interest in jointly addressing the issue of pesticide management, especially a new pesticide registration system.

**Finding 19.** There is a risk that the disposal of obsolete pesticides will be prolonged even further due to the lengthy administrative processes that need to be met for the disposal of obsolete pesticides in the country or abroad.

103. The possibility of eliminating obsolete pesticides in the country has been considered a potential co-benefit generated by the project. However, at the same time, this possibility has created uncertainty about when, how and where the disposal will take place. The company must be authorized by the Ministry of Environment, and it is uncertain how long this process will take. According to the desk review and interviews, the authorization process began in August 2019. So far, no response has been received. As mentioned in the section on execution, the authorization of the OSMP took almost two years. In addition, if the Ministry of Environment rejects the request, then the process would have to begin to hire a foreign company to oversee the disposal. This would take a considerable period of time due to the permits required for the cross-border transport of obsolete pesticides in compliance with the Basel Convention.
104. Regarding sociopolitical risks, the COVID-19 pandemic generated a change in priorities at the global and national level, and its evolution has led to unexpected changes to government planning. Therefore, there are moderate risks that could materialize in terms of changes in the country's policies, including the policy of a multisectoral vision for pesticide management.

### 3.5.3 Financial sustainability

**Finding 20.** The identification of the IPM practices and alternatives to dangerous pesticides, which can generate high-quality and competitive crops, is considered an important advance. However, it is necessary to continue with their adoption so that the financial and economic benefits identified in the project document can be obtained.

105. The project reported that the IPM practices and the alternatives evaluated do not represent an additional cost for producers and that, on the contrary, they could mean a slight reduction in costs in some cases. However, it is necessary to strengthen the strategy and continue promoting the adoption of these practices and alternatives, which, according to international experience, can generate high-quality and competitive crops. This would contribute to the sustainable intensification of agriculture and the economic and financial sustainability of producers, as anticipated in the project document.

**Finding 21.** The priorities of the current national government in terms of reducing the fiscal deficit may pose a financial risk to the sustainability of the project, and to the needs that arise in the public organizations involved in ensuring the sustainability of the achievements and continuing to execute the lines of action with results still pending.

106. One of the priorities of the new government, as a measure to control the fiscal deficit, is the reduction of public spending by eliminating the incremental logic of the budget, according to which each executing unit proposed the additional resources required. In this regard, the financial programming that accompanies the budget planning implies, from 2021 onwards, the generation of savings in the different state agencies.

107. These restrictions may imply a financial risk since the public organizations involved in providing continuity to the different lines of action that the project proposes have expressed needs related to infrastructure and equipment and the training of human capital.
108. In fact, these restrictions have already limited or delayed the possibilities of carrying out activities during the final stages of the project. The project steering committee meeting minutes on 14 May 2020 record that, regarding the environmental monitoring of a second basin, representatives of the National Directorate of Quality and Environmental Assessment expressed the following: "considering the budgetary restrictions, combined with time limits and the health emergency, the National Directorate of the Environment [now the National Directorate of Quality and Environmental Assessment] will have to address this issue with its own resources, but it will not be in 2020."
109. It is underscored that no financial risk was identified regarding the elimination of obsolete pesticide stocks. This is because the private sector has the legal obligation to do so and, in the interviews, it was confirmed that it is prepared to assume the costs that this action will generate.
110. Finally, and to answer the question about whether the project execution modality facilitated its ownership by the participants, it is important to mention that the direct execution modality used in this project is considered appropriate to implement these types of projects. This is because it allows for the generation of equal conditions for the participating government actors. However, the lack of effective involvement of the Ministry of Livestock, Agriculture and Fisheries and the Ministry of Public Health during project formulation and governance arrangements did not promote adequate project ownership. This situation was also observed, albeit to a lesser extent, in the private and social sectors (for further details, see the sections on Quality of implementation and execution and Stakeholder engagement).

*The rating for the sustainability criterion is moderately likely.<sup>17</sup>*

## **3.6 Factors affecting performance**

### **3.6.1 Design**

**Finding 22.** The project addresses priority problems. Its design is considered innovative and a catalyst to achieve a comprehensive approach to pesticide management in the country by incorporating the visions of the health, production and environmental areas.

**Finding 23.** However, a more elaborate strategy was necessary from the formulation of the project to reconcile these approaches and achieve a common vision of the project among its partners. The lack of this common vision was reflected in different areas of project execution.

111. The objective and expected results of the project focus on priority areas for Uruguay, as established in the section on relevance. Furthermore, although the Implementation Plan of the Stockholm Convention of Uruguay (Government of Uruguay, 2017) already considered the participation of the Ministry of Environment, the Ministry of Livestock, Agriculture and Fisheries, and the Ministry of Public Health in the management of pesticides, the project represents an initiative that has consolidated this cooperation. According to international

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<sup>17</sup> The criterion was revised as part of the update (evaluation Phase 2) and the related analysis can be consulted in Section 4.

- experience, the reconciliation of the visions in the production, environmental and health sectors is essential to ensure benefits for all three sectors.
112. One of the areas for improvement identified in the project formulation phase is the lack of a more elaborate strategy to combine these three visions. It was observed that the Ministry of Livestock, Agriculture and Fisheries, which has the main responsibility for the management of pesticides in Uruguay, was not effectively involved in this design phase.<sup>18</sup> This limitation of the strategy did not allow for the generation of a common vision from the productive and environmental protection perspective regarding the approach, results and outputs of the project, as well as the way in which they would be obtained. This created an environment of institutional tension during project execution, mainly between the Ministry of Environment and the Ministry of Livestock, Agriculture and Fisheries. This negatively affected the effectiveness and scope of the project.
113. This situation, in addition to being supported by the interviews, is corroborated by the first PIR (2017), which indicates limited knowledge in the Ministry of Livestock, Agriculture and Fisheries about the content of the project. In addition, its effects are observed in what was reported in that PIR regarding the lack of interinstitutional coordination as a risk that increased from moderate to high. Three new risks were also included linked to the lack of commitment and collaboration, as well as disagreements over project activities, which were rated as high risk.<sup>19</sup>
114. This situation is mentioned repeatedly in the semi-annual progress reports. For example, in the semi-annual report for the period from July to December 2020, the following was reported: "there are several factors that continue to affect delays in the execution of project activities and outputs and are generally directly associated with the lack of definition by the authorities on some 'key outputs,' which end up affecting the achievement of some outcomes ... the limited communication between the counterparts due to disagreements on technical aspects of some issues, such as the pesticide registry, represents an ongoing challenge to move forward at the expected pace."
115. Regarding the incorporation of the health sector in the project, the participation of the state-owned water utilities company, State Sanitary Works, was included in the formulation phase to address the issue of water contamination. However, it did not take part at the beginning of the execution stage. Instead, the Ministry of Public Health was invited with the extent of its participation defined during project implementation.
116. Another aspect that is important to address in the project design is the inclusion of the issue of contaminated sites specifically linked to strengthening the capacities of the private sector for their remediation. According to the desk review and interviews, Uruguay does not have a defined policy on contaminated sites, and there is no clarity about who is responsible for their management. Therefore, Outcome 1.2 and Output 1.2.1, which addressed the issue of contaminated sites, were modified to focus on capacity development for the management of incidents and accidents generated by the use of pesticides. Therefore, it is considered that the inclusion of the issue of contaminated sites

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<sup>18</sup> The Ministry of Livestock, Agriculture and Fisheries, through the General Directorate of Agricultural Services, has the main legal powers for the management of pesticides for agricultural use in the country. Its competencies cover different stages throughout the life cycle of pesticides, including registration, manufacturing, packaging, labelling, use and advertising, as well as the supervision of operators.

<sup>19</sup> The identification and monitoring of risks was carried out through the PIRs.

in the project design was not relevant. As a result, the opportunity to include another issue of equal importance that was considered a priority for the Uruguayan Government was missed.

*The rating for the project design is moderately unsatisfactory.*

### **3.6.2 Quality of implementation and execution**

**Finding 24.** FAO, as the implementing and executing agency of the project, supported the conceptualization and development of a priority and innovative project for the Uruguayan Government. Areas for improvement in implementation are identified in the formulation and technical supervision phase of the project.

#### **3.6.2.1 Implementation**

117. FAO has played the role of implementing and executing agency of the project. Regarding its role as implementing agency, it played a central role in the preparation of the project implementation form and project document, which clearly identifies the problem to be addressed, the project objective and the multisectoral approach required to combine different visions. Regarding areas for improvement in this phase, FAO has shared those that were identified in the design section.
118. FAO Uruguay has not had a resident Representative for seven years. Until two years ago, it had a series of interim Representatives and, currently, the Programme Officer serves as Representative. In the interviews, it was mentioned that FAO officials met with the Minister of Livestock, Agriculture and Fisheries and the Minister of the Environment during project implementation and expressed their concern about the situation. However, a shared vision between the ministries was not achieved at the operational level. Therefore, it is considered that FAO should have warned the project team about the risks of not effectively involving the Ministry of Livestock, Agriculture and Fisheries from project design.
119. Regarding technical supervision, the Lead Technical Officer, who initially supported the formulation of the project, had to be replaced under the argument that this person failed to understand the context and particular needs of the country in terms of pesticide management. The project had three Lead Technical Officers during implementation. According to the interviews and desk review, technical advice from the Lead Technical Officers has been limited. The above is corroborated by the lack of evidence of any field visit by the Lead Technical Officer on duty, as well as the delays in the technical reviews documented by the MTR and the lack of expert technical advice in the review of the OSMP and other studies and methodologies, as well as an effective review of the PIRs (see the section on monitoring and evaluation [M&E]). It is understood that the last Lead Technical Officer assigned to the project in 2020 was not able to carry out any supervision visits due to the COVID-19 pandemic. Additionally, FAO was unable to obtain an expert to provide training on the management of obsolete pesticides based on the environmental management toolkits for obsolete pesticides with a view to their disposal under the project, which was one of the reasons that prevented the strengthening of capacities on this issue.

*The rating for implementation is considered moderately unsatisfactory.*

#### **3.6.2.2 Execution**

**Finding 25.** Project execution was developed in a complex situation, which, in some cases, led to changes to the project strategy.

120. The PCU was established for project execution, which coordinates its day-to-day activities. The PCU had the task of executing the project in a complex situation regarding the relationship between the Ministry of Environment and the Ministry of Livestock, Agriculture and Fisheries, in which it has been difficult to reach agreements, both in terms of basic aspects of the execution (for example, hiring an expert to design a communications strategy), as well as in important policy decisions (for example, the approach that should be taken to improve pesticide registration).
121. In response to this situation, the PCU implemented various strategies and incorporated important actors during the execution of the project. It generated very close collaboration with academic groups, which had made important advances in research on the IPM and recognized international consultants. Together, this allowed for the satisfactory fulfilment of some of the project's outputs. In addition, it partnered with some producers who are already aware of the benefits of agroecology to conduct studies on alternatives to pesticides. This has strengthened their commitment to these practices. Finally, as indicated, the hiring processes were lengthy on some occasions. However, the administration and use of resources were carried out in a largely adequate manner.
122. The PCU implemented some adaptive measures that facilitated progress in the execution of the project and mitigated some risks. For example, it worked with areas of the Ministry of Livestock, Agriculture and Fisheries in which there was no friction with other government entities linked to the project issues, and it focused on updating regulations related to issues in which only the Ministry of Environment had jurisdiction. For other risks, their materialization was accepted and, consequently, it was decided to modify the results framework. For example, given the impossibility of reaching an agreement with the government bodies on the points to improve in the pesticide registration system, it was decided to only commit the project to generating a registration proposal instead of achieving its approval and implementation within the framework of project execution.
123. In some other aspects of execution, areas for improvement of the PCU are noted. An example of these are the training and awareness raising actions provided, which lacked an adequate methodology, and the use of good practices, which had a negative impact on the effectiveness of some outputs. Other areas of improvement were identified in the monitoring of project progress, the failure to document and formalize changes to the results framework, and in the assessments of some outputs and studies (for example, the OSMP).

*The rating for execution is considered moderately satisfactory.*

124. The Ministry of Environment, as the leading executing partner, actively participated in the design and execution of the project, as well as in its monitoring and supervision through the project steering committee and in providing close support to the work of the PCU, which was in the ministry's facilities. The Ministry of Environment recognizes the progress of the project in terms of the dialogue initiated between the three ministries, including the Ministry of Livestock, Agriculture and Fisheries and the Ministry of Public Health, to address the issue of pesticides. As a government entity, the Ministry of Environment has been exposed to administrative complications that led to the final approval process for the OSMP taking almost two years. Currently, there are two approval processes in progress: one to authorize a collection site for obsolete pesticides and another to authorize a private company to carry out the disposal of hazardous waste in the country. This last process began in August 2019. So far, no resolution has been issued.

125. The Ministry of Livestock, Agriculture and Fisheries, which is identified in the project document as a primary implementing partner, provided monitoring of the project through its participation on the project steering committee – even though the representatives on the committee lacked decision-making power. These decisions were made through another line of communication. In general, the Ministry of Livestock, Agriculture and Fisheries was actively involved in activities that did not conflict with its pesticide management approach. In particular, its laboratory had an important connection with the project to strengthen its analytical capabilities. Also, the General Directorate of Farms has been linked to the project to strengthen the capacities of pesticide operators and disseminate the IPM practices. The Ministry of Livestock, Agriculture and Fisheries recognizes the need to strengthen the regulatory framework for pesticides and some aspects of their management. However, it does not agree with some of the approaches and has not fully used some of the outputs generated by the project.
126. As indicated, the participation of the Ministry of Public Health was not planned in the formulation of the project. This sector has made progress in pesticides, but it has not developed significant capacities in this regard and even less so considering the greater attention currently demanded by the COVID-19 pandemic. Here, the Ministry of Public Health's participation in the project was more limited and linked to occupational health and biological markers. Its participation in the strengthening of analytical capacities was not possible since it does not monitor pesticides, even though this was noted in the project document.

**Finding 26.** The direct execution modality is considered correct for these types of projects where it is crucial to reconcile the health, production and environmental visions in a neutral setting. However, it is important to try to ensure the same level of participation for all implementing partners.

127. This project has been developed under the direct execution modality with FAO also as the executing agency. It is considered that this modality is appropriate for these types of projects, where the productive, environmental and health sectors need to be on equal terms to agree on actions that allow mutual benefits to be obtained. However, coupled with the lack of effective involvement of the Ministry of Livestock, Agriculture and Fisheries and the Ministry of Public Health during the design of the project, the fact that the Ministry of Environment was the lead executing partner and that the PCU was physically based in its facilities generated the perception that the project is biased in favour of environmental issues from the perspective of the Ministry of Environment.
128. The issue of equality of the three ministries in project execution was addressed in the first session of the project steering committee. This noted the importance of modifying the project document, particularly the implementation arrangements section, to express such equality. In this regard, it was proposed that a draft proposal be developed to modify the document. However, the issue was not discussed in the following sessions and therefore no agreement was reached on the matter.

**Finding 27.** The project steering committee addressed strategic and priority issues of the project, but it had limitations in addressing some other issues of equal importance.

129. As of 2020, the project steering committee had met nine times. According to the session minutes, the main topics addressed were the approval of the lines of work, which initially had a significant delay, and the presentation of project progress. It is striking that in these

sessions the risk of failing to comply with some of the established outcomes (for example, the elimination of obsolete pesticide stocks) was not raised, nor did they address the various adjustments made to the results framework due to the difficulties of interinstitutional coordination. There were also no discussions about the disagreements that existed with the Ministry of Livestock, Agriculture and Fisheries, which were reported in the project progress reports (PPRs) and pointed out during the interviews, or the effect that this situation could have on the expected impacts of the project and the best way to mitigate this risk.

130. Based on what is reported in the semi-annual PPR 3, which covers the period from July to December 2017, this situation was analysed by the PCU, FAO and the project focal point. Decisions were made on the steps to follow for the project. In this regard, the project steering committee represented a strategic space to monitor and continue the project, but it had limitations in addressing priority issues such as possible non-compliance with the outcomes. It was also found that the minutes did not include the agreements reached in each session or a monitoring plan, if required, which makes it impossible to know the level of commitment of members to the fulfilment of these agreements.

### **3.6.3 Monitoring and evaluation**

**Finding 28.** The M&E plan includes most of the elements and requirements necessary to fulfil its function, and compliance has been almost complete.

**Finding 29.** The areas for improvement identified include the lack of several SMART indicators in the results framework, which affected the monitoring system developed.

131. The Evaluation Team highlights the explicit indication in the M&E plan to design and implement the M&E system and monitor the project steering committee meetings. As areas for improvement in its design, it was found that the results framework lacks several SMART indicators. This will be explained in the following paragraphs.

#### **3.6.3.1 Design of the monitoring and evaluation plan**

132. In analysing the design of the results framework, it is clearly aligned with the GEF POP monitoring tool (Cycle 5) by including three indicators of this tool. Also, it includes baselines for the indicators that require them, even though the PCU has not had access to the methodology through which they were estimated.
133. Among the opportunity areas identified in the design of the results framework, the following are mentioned:
- i. The inclusion of Outcome 1.2, which focused on capacity development for the remediation of contaminated sites and with an output (Output 1.2.1) focused on developing guidelines for the remediation of contaminated sites by the private sector. As explained more fully in the section on factors affecting performance, the inclusion of this topic was not entirely relevant because there is still no legal clarity on who is responsible for managing contaminated sites in the country.
  - ii. For some indicators, the results framework lacks a formal and clear description of the indicator. In some cases, it is necessary to infer the description through the baseline, goal or output, and, in other cases, such as Indicators 1.1 and 4.1, the indicators are not very objective.

- iii. A total of 19 goals were identified out of a total of 41 (46 percent), which are not objectively measurable. In several cases, the goal does not include a parameter that allows for determining whether it was met or not. In some cases, this parameter is included in the milestones and, to a lesser extent, in the means of verification or in the description of the output or outcome. This leads to interpretations of the goals being made to complement and measure their progress. In some cases, these interpretations were not the most appropriate, as will be seen later when the monitoring system developed by the PCU is addressed. In addition, since the executing entities generally do not participate in the design of the projects, it is worth mentioning the importance of SMART indicators to enable their correct understanding of the project's objectives and what needs to be measured.
- iv. The project document states that the M&E system would be reviewed in the initial phase of the project. Given the areas for improvement presented in the framework design, it would have been ideal to make the necessary changes at the beginning of the project to ensure the system's clarity and usefulness for monitoring. There is also a disregard of the importance of the project start-up workshop to visualize and solve these issues. Further, in the institutional arrangements section of the project document, the creation of a technical monitoring committee is mentioned. Its functions, however, are not explained. In the end, this committee was not created.

### **3.6.3.2 Implementation of the monitoring and evaluation plan**

**Finding 30.** Project monitoring shows areas for improvement. This includes the lack of methodologies or the use of methodologies that are not sufficiently robust to measure some of the results and a not entirely objective monitoring of the project's achievements.

- 134. The PCU designed and implemented a monitoring system, which consists of an Excel spreadsheet with the outcomes and outputs of the results framework. The system omits the indicator on the risk level of Outcome 1.1, and this omission was carried over to the PIRs reported in 2017, 2018, 2019 and 2020. Also, the lack of precision in some of the output targets led, after the MTR, to milestones being included as goals in some cases of the monitoring system. For example, "Programme implemented" was included as a measurement unit. This is actually a milestone of Outcome 1.2.
- 135. Another area of opportunity for the monitoring system is the reporting of goals as met when, according to the evidence collected and the qualitative description that accompanies the numerical data of the system, these have not been achieved. Consequently, the level of achievement estimated in the system does not reflect the actual level of achievement of the project. This situation was also reported in the PIRs, as will be described later.
- 136. As indicated in the project document, missing information required for monitoring should have been identified at the beginning of the project alongside the necessary measures taken to generate it. This was not carried out by the project, and the MTR identified this lack by stating: "The project does not have an information collection system for measuring the expected results." Therefore, it was recommended to hire a consultancy to design a system for measuring the expected results. This would have involved its testing but was not carried out.
- 137. Regarding the progress reports contemplated in the M&E plan, the project presented five PIRs. Among the areas for improvement found in the reports are the following:

- i. From the first PIR (2017) to the 2020 PIR, the report on the risk level indicator of Outcome 1.1 was omitted, which means its compliance status was only reported in the 2021 PIR.
- ii. Outcomes and outputs were reported with evidence that does not support the indicated level of achievement. As an example, the cases identified in the 2021 PIR are noted:
  - Indicator *Waste management plans to prevent the future accumulation of pesticide stocks and empty containers* (Indicator 1.4.2.4 of the GEF monitoring tool for POP) of Outcome 1.1, with the final goal of ensuring management plans are budgeted and implemented. In the PIR progress section, it is reported that the OSMP was signed and that its implementation will begin in the second half of 2021. According to the interviews and the desk review, it was confirmed that the OSMP has not been implemented. However, the goal is reported in the PIR as 100 percent met. The indicator also includes empty pesticide containers, which are not included in the OSMP. No progress is reported in this regard. This same situation is repeated, for example, in Outcome 2.1 and Outputs 1.1.3, 3.1.2 and 3.2.1, among others.
- iii. Progress is reported that does not correspond to the output or outcome without having formalized and reported any changes in the PIR section on changes to the project strategy. In addition, these changes are not based on any agreements made by the project steering committee, as in the case of Output 1.1.2.
- iv. No changes are reported to outputs that have lost their relevance given the current context in which the project is developed. For example, this is the case of the indicator related to training the private sector on the management of obsolete pesticides in Output 1.1.4.
- v. In the section on progress in the generation of project outputs, decisions taken to change the project strategy are reported. These are not addressed in the section expressly for this purpose. For example, in the 2020 PIR, for Output 1.1.2, it is reported in the PIR progress section that the PCU, in consultation with the project steering committee, decided to design a capacity development plan on the management and storage of POP and other pesticides, expanding the target audience to include students. This is not mentioned in the changes section.
- vi. Starting with the 2018 PIR, the column that indicated the final goal of the project for the outputs was eliminated. This made it difficult to review the progress shown in subsequent PIRs since different percentages are reported for the same output corresponding to output indicators that are not mentioned and, in some cases, the information presented is not enough to infer which indicator is being referred to. This also allowed progress to be reported that does not correspond to either the output or outcome.
- vii. There are some omissions in reporting changes to the project strategy. For example, in the 2017 PIR, a change in the basins that will be analysed is reported for Output 3.1.1. However, this change should have been indicated for Output 4.1.1, which includes monitoring in the basins.

- viii. In the risk section of the 2019 PIR, it is stated that the results have not materialized. This contradicts what was reported in the progress section for some results in which 100 percent compliance is reported.
  - ix. In the stakeholder engagement section of the 2018, 2019 and 2020 PIRs, stakeholders that did not participate in the project are reported, such as the National Milk Institute, the National Institute of Viticulture, and the Development and Climate Change Adaptation project.
138. The GEF monitoring tool for POP was not used by the project to report its progress. Instead, the project chose to include three indicators from that tool in the project results framework and report their compliance in the PIRs. This meant that the PCU was not aware of the tool and, therefore, did not use it as another mechanism to monitor the project. The results were not reported to the GEF in the usual format.
139. As indicated in the implementation section, technical supervision by the Lead Technical Officers has faced limitations in terms of the technical review of outputs and methodologies and the reporting of the PIRs. There is evidence of two visits by the Funding Liaison Officer at the beginning of the project, but no visits are recorded by the three Lead Technical Officers who have advised the project. Although the COVID-19 pandemic has restricted visits since 2020, no reasons were identified to justify this in previous years. Further details on technical advice and risk identification and management are presented in the subsection on implementation and execution.
140. In accordance with the interviews for this evaluation, changes were discussed and agreed upon in the MTR which, unintentionally, were not included in the recommendations. Finally, these were reported as changes to the results framework in the last PIR of the project. Also, errors were identified in the Excel spreadsheet of the MTR report where the original results framework and the proposal derived from the MTR are shown, and inaccuracies are observed in some of the analyses.
141. The MTR issued 26 recommendations, of which 9 focused on modifying the results framework and were fully implemented. Another seven recommendations focused on issues related to the extension of the project execution period, the hiring of a legal specialist, and the holding of annual technical conferences, among others, which have been fully implemented. Two other recommendations have been partially implemented. One suggested the rapid approval and implementation of the OSMP, and the other recommended incorporating the gender perspective into the project. Eight other recommendations have not been implemented, among the most important being: the creation of communications, training and dissemination plans approved by the Ministry of Livestock, Agriculture and Fisheries and the Ministry of Environment; expanding the knowledge of the stakeholders about the project; and carrying out a consultancy to measure the results of the project.

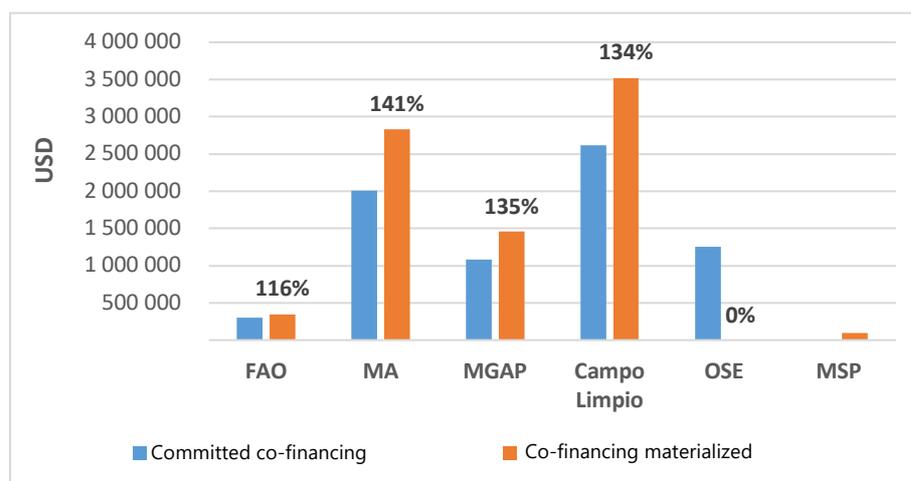
*The rating for M&E is moderately unsatisfactory.*

### **3.6.4 Co-financing**

**Finding 31.** The project has reported the materialization of co-financing 14 percent higher than the amount committed at the beginning of the project. However, the formalization of the final amount of co-financing provided is still pending.

142. The co-financing committed by the project partners totalled USD 7 258 000. According to data reported in the 2021 PIR, as of June 2021, 114 percent of the co-financing had materialized. This is equivalent to USD 8 255 200, meaning that the initial amount of committed co-financing has been exceeded by 14 percent. Figure 5 shows committed and realized co-financing, and Appendix 4 shows the co-financing table. It is noted that the Ministry of Environment has provided co-financing in-kind and through a subsidy provided to FAO for carrying out environmental monitoring in priority basins within the framework of a UTF project. The grant amount through June 2020 was USD 459 060 and included the monitoring of one basin.

**Figure 5. Co-financing committed and materialized**



Note: MA = Ministry of Environment; MGAP= Ministry of Livestock, Agriculture and Fisheries; OSE = State Sanitary Works; MSP = Ministry of Public Health.

Source: Authors' own elaboration.

143. The estimate for the co-financing provided by the project partners is based on what was reported by the PCU since the partners did not respond to the request to provide their own estimates. The estimates were sent to the partners for confirmation via email. The PCU also reported that it has not had access to the co-financing letters signed by the partners during the GEF project approval process.
144. The Evaluation Team did not have access to the estimates made by the PCU, but the interviews with the different partners provide an account of the activities carried out to support the project actions given the alignment of the project with their institutional responsibilities. However, it is considered important that the final amount of co-financing provided is formalized through an official letter from the partners.

*The rating for co-financing is satisfactory.<sup>20</sup>*

### 3.6.5 Commitment of partners and stakeholders

**Finding 32.** The mechanisms implemented by the project for private sector involvement in the development of regulations were mostly successful.

<sup>20</sup> Co-financing data were updated as part of Phase 2 of the evaluation. This can be found in Appendix 4, the GEF co-financing table.

145. One of the strengths of the project in relation to the involvement of the private sector was the convening and integration of working groups as a methodology for the development of proposals to improve regulations for the different stages of the life cycle of pesticides. This is linked to their use or application, storage and transportation. As for the elimination stage, this was addressed through the OSMF by hiring a consultancy to support Campo Limpio.
146. The strategy based on the creation of working groups supported the development of higher quality outputs. This took advantage of the knowledge and experiences of the parties involved in these processes, as well as promoted their ownership of the resulting outputs. In this framework, significant involvement of the private sector was achieved with the participation of the different business chambers linked to the production, manufacturing, import and marketing of pesticides.<sup>21</sup> These actors contributed to the development of the outputs with different levels of participation, which also strengthened their capabilities. In addition, these activities were carried out in coordination with trade associations,<sup>22</sup> along with technical units from various ministries<sup>23</sup> and the University of the Republic,<sup>24</sup> among others.
147. Both the representatives of the business chambers and Campo Limpio expressed their satisfaction with the processes and results of these activities. They did, however, point out that the disagreements between the ministries, particularly between the Ministry of Environment and the Ministry of Livestock, Agriculture and Fisheries, generated delays and uncomfortable situations that should have been avoided through the definition of strategic agreements as a basis for starting the work.
148. However, the proposal linked to the improvement of regulations in the import phase of pesticides, in particular to improving the pesticide registration system, was carried out through a consultancy without further participation of the actors associated with these procedures. Indeed, during the development of this consultancy, no consultation activities were carried out with private sector associations or other actors linked to the pesticide registration process. Although the consultant held meetings to present results during its missions to the country organized within the framework of the project, the evidence is consistent with the perception of the interviewees that consultation mechanisms were not implemented before, during or after these meetings that were solely aimed at providing information. In this regard, there is a consensus that there was no space for the exchange of opinions to incorporate the knowledge, experience and points of view of actors linked to the registration, manufacture, import and marketing of pesticides, or that it was difficult to dispose of them because the meetings brought together a diversity of actors, some of them with opposing opinions. This has prevented a constructive dialogue.

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<sup>21</sup> Chamber of Commerce of Agrochemical Products of Uruguay; National Chamber of Fertilizers and Phytosanitary Products; Technical Support Group on Oilseeds; National Association of Private Aeroagricultural Companies; and Business Chamber of Maritime-Port Activity.

<sup>22</sup> Chamber of Veterinary Specialties; Association of Chemical Engineers of Uruguay; and Association of Agricultural Engineers of Uruguay.

<sup>23</sup> General Directorate of Agricultural Services of the Ministry of Livestock, Agriculture and Fisheries; Environmental and Occupational Health Division of the Ministry of Public Health; National Fire Department of the Ministry of the Interior; and Division of Environmental Working Conditions of the Ministry of Labour and Social Security.

<sup>24</sup> Faculties of Chemistry and Medicine through the Toxicological Information and Advice Centre.

149. The absence of effective participation mechanisms for the realization of this key output of the project hindered the possibilities of ownership of the process and its resulting proposals. As a result, affinity was not generated with an important number of these proposals, particularly with respect to the possibility of integrating new ministries in the management of the registration system and the ERA. In addition, several interviewees pointed out a certain degree of ignorance of the current system in the country as a deficiency. However, they also recognized its applicability with respect to a set of useful proposals, which the business chambers are already beginning to consider with the help of the General Directorate of Agricultural Services. Also, they highlighted that, despite its deficits, this process raised awareness about the need to update the pesticide registration system in some of its aspects.
150. Also, it should be noted that the involvement of academic institutions in the project led to the establishment or strengthening of cooperative relations with universities abroad (including Uppsala University and Wageningen University) and in the development of undergraduate and postgraduate theses related to the work topics addressed.

**Finding 33.** The direct involvement of producers in the project included work on nine family farms. In addition, through outreach activities, a larger number of producers were reached.

151. Regarding the participation of producers as the beneficiary public of the project, they were involved through different activities. Among this, the experimental activities for the validation of alternatives to pesticide use had the highest level of direct participation. In this context, selected families offered their properties and actively participated in carrying out pilot projects within the framework of Component 3. A total of nine family properties were involved in these activities. The families were selected through intermediary organizations (producer societies or cooperatives, or institutions linked to the Ministry of Livestock, Agriculture and Fisheries, in particular the General Directorate of Farms), with knowledge of the profiles of the productive establishments in the areas of intervention, generally prioritizing their interest in good environmental management practices to ensure their commitment to the project. According to the interviews, these parties received relevant information to understand and participate in the work process and its results. Although this process involved a limited number of families on pilot properties, demonstration days were held within the framework of these practices with the participation of a broader audience of producers in the area, where the participants discussed their experience together with exhibitions by the PCU and technical staff associated with the project. Also, the producers participated in the project through talks and dissemination sessions on various topics linked to the main axes of the project and the collection of empty pesticide containers.

**Finding 34.** Although the project involved a varied set of civil society actors, the absence of a mechanism for monitoring participation led to the weak involvement of some important actors on issues related to pesticides.

152. As noted, the strategy of involvement through working groups took precedence in the implementation of proposals to improve regulations for the different stages of the life cycle of pesticides. However, the participation of groups associated with other components was not sustained over time.<sup>25</sup> When the project considered that their participation had

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<sup>25</sup> This analysis is based on partial information from attendance lists, complemented with evidence that arises from interviews with different members of the groups and from the PCU.

completed its cycle, the work methodology was changed, and its members were not invited again under the new dynamic. Given the closure of certain groups, some actors declined to continue their participation. However, faced with this situation, the project did not implement mechanisms to understand the reasons, possible conflicts or causes of disinterest that could have caused the distancing to eventually attract these actors back. This led to the weak participation of important actors, particularly linked to civil society, including: i) the National Workers' Assembly of Uruguay, identified in the project document as an actor with the capacity to support the training of rural workers in the practices of use and the management of pesticides; and ii) the environmental civil society organizations identified in the project document through the Action Network on Pesticides and their Alternatives for Latin America and the Network of Environmental Organizations, as actors with the capacity to make specific contributions to the role of civil society in the proper use and management of pesticides.

153. In the case of the National Workers' Assembly of Uruguay, the participation of two of its representatives is recorded. This was limited to a first meeting on Component 1, after which the institution did not participate again in the project through groups or other forms of involvement. Although requested by the Evaluation Team, it was not possible to interview representatives of the organization.
154. Regarding civil society environmental organizations, the Action Network on Pesticides and their Alternatives for Latin America participated. Its representatives attended two meetings within the framework of Component 2 and one meeting in the framework of Component 3. They subsequently stopped participating due to differences with the work approach, such as the lack of an approach to highly hazardous pesticides, among other aspects. In this scenario, no actions were taken by the project to determine the reasons for the withdrawal.
155. Finally, it should be noted that Vida Silvestre, another environmental civil society organization, did not participate in the working groups. However, representatives of the organization were invited to the results presentation sessions, and one of its members was invited to participate due to their training and technical knowledge in relation to Component 4. Although participation was not sustained, it was possible to verify that a relationship had been developed that enabled, for example, the establishment of synergies. This also considers that members of this organization – now representing other projects – recently contacted the project to coordinate joint activities in one of their lines of work.
156. It should be noted that all of those involved in the groups, with or without continuous participation, continued to receive communications about the project either through information bulletins produced in collaboration with the FAO Communicator, or through invitations to participate in results presentation days.

**Finding 35.** The University of the Republic and the laboratories of the Ministry of Environment and the Ministry of Livestock, Agriculture and Fisheries were involved in the environmental monitoring actions as planned, but there were no participatory mechanisms to effectively integrate the Departmental Government of Canelones – nor was the Technological Laboratory of Uruguay (LATU, by its Spanish acronym) invited to participate.

157. In relation to the execution of Component 4 activities linked to environmental monitoring and response to pesticide risks, coordination activities were carried out with the Government of Canelones through the Rural Development Agency and the Environmental Management Directorate. The project implemented direct communication mechanisms.

Through the Laguna del Cisne Basin Commission,<sup>26</sup> it also involved these actors in activities to present results. However, they were not involved in the activities through effective participation mechanisms. Consequently, part of their vision and interests were not considered in the monitoring of the basin, particularly in relation to the construction of a broader monitoring perspective that included socioterritorial aspects. However, these actors consider that the project activities were useful in terms of generating a baseline from scientific evidence on the presence of pesticides to subsequently monitor their evolution in an area where the production systems are in a transition process.<sup>27</sup>

158. In addition, the design of the coordination mechanism for environmental monitoring required, according to the project document, the establishment of an interinstitutional agreement that included (in addition to the Ministry of Livestock, Agriculture and Fisheries, the National Directorate of Quality and Environmental Assessment, the University of the Republic, and the departmental authorities) the Technological Laboratory of Uruguay.<sup>28</sup> However, this laboratory was not included through an agreement or other forms of cooperation in the monitoring process. It should be noted that, according to public information available on its website, the institution provides environmental analysis and monitoring services and that one of its strategic lines is the analysis of environmental matrices with the objective of supporting the industry in environmental protection through compliance with environmental regulations (LATU, 2018). One of the indirect clients of this laboratory is the Ministry of Environment, which has contracted LATU to analyse samples. The LATU sends them to the Ministry of Livestock, Agriculture and Fisheries to carry out the analysis.

*The rating for the stakeholder engagement criterion is satisfactory.*

### **3.6.6 Knowledge management, communications and public awareness**

**Finding 36.** The project has generated important knowledge about the IPM practices for crops of interest in Uruguay and alternatives to dangerous pesticides. However, the contribution of this knowledge to capacity development is still unclear.

159. The project has generated important knowledge on the IPM practices for crops of interest in Uruguay and alternatives to dangerous pesticides, which have been studied and

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<sup>26</sup> The Laguna del Cisne Basin Commission advises the Regional Water Resources Council for the Río de la Plata Basin and its maritime zone and aims to provide sustainability to the management of natural resources in the Laguna del Cisne Basin and manage potential conflicts over its use. Since the constitutional reform of 2004 and the National Water Policy Law of 2009 (No. 18 610), the National Water Directorate promotes sustainable and participatory water management considering hydrographic basins as the main management unit. For this purpose, the Regional Water Resources Councils of the Uruguay River, the Merín Lagoon, and the Río de la Plata and its Maritime Front were created as tripartite areas for management of the three large cross-border basins of the country. Based on the needs and expressions of interest in the territory, each council resolves to form the basin commissions, which are made up of government representatives, water users and civil society.

<sup>27</sup> Between 2014 and 2015, the Municipality of Canelones defined a series of precautionary measures to protect the Laguna del Cisne area, establishing that no planting or fumigation can be done less than 100 m away from the lagoon. Also, it requires that any project that is incompatible with the preservation of the basin presents an abandonment plan for that use within a maximum of three years.

<sup>28</sup> The LATU is a non-state public law organization created in 1965 to provide services oriented towards the productive chain. It offers a wide range of analytical services with tests accredited by the OUA and the United Kingdom Accreditation Service. It develops analytical methods for compliance with national and international regulations in order to overcome technical barriers to the entry of national production into other markets. In addition, through Latitud, its foundation for research, development and innovation, it plans and executes projects adapted to the needs of the industry and the country.

validated. To support the training and dissemination of this knowledge, the project has produced ten testimonial videos and two tutorials. The contribution that this knowledge has made to the generation of capacities on the IPM and alternatives to pesticides at the producer level is still not clear. As a result, the training and communication actions present areas for improvement. Their effect has not been measured.

**Finding 37.** The project did not have a communications strategy or an expert to support this task, so the communication and visibility of the project have been limited.

160. The absence of a person responsible for communications and therefore a communications strategy limited the possibilities to disseminate the generated outputs. For example, there is no evidence of the dissemination of the testimonial videos and tutorials, nor statistics on the number of visits to the sites where they were published.
161. The cause of these limitations was the difficulty in agreeing on a project communications strategy that would reconcile the visions of the three ministries involved. Therefore, the hiring of a communications consultant to support the project was not authorized. Instead, the ministries agreed that they would use their own communications structures to disseminate information about the project. FAO also carried out dissemination actions through newsletters published on its website and press releases. According to interviews, the project has had limited visibility.
162. Technical and scientific papers were published on the results (Basso, Chiaravalle and Maignet, 2020; Kaspary, García, Cabrera, García and García, 2021; Kaspary, García, Jorajuría and Cabrera, 2020; Tesitore, Rodríguez-Bolaña, Goyenola *et al.*, 2020). In addition, an undergraduate thesis (Scanu, 2020) and a master's thesis (Reynoso, 2017) were published on these thematic areas, and presentations were given at conferences with their respective publications for dissemination at the academic level (Scanu *et al.*, 2018; Hernández *et al.*, 2017; Reynoso *et al.*, 2017; Peirano *et al.*, 2016). The project document also points out the need to prepare a technical document that systematizes the lessons learned during the development of these studies, of which there is still no evidence.
163. Additionally, the project generated the Guide to the Prevention of Incidents and Accidents in the Handling of Pesticides in Extensive Agriculture, Horticulture and Forestry (FAO, 2019), which was published and disseminated in the training events held. Although it was expected that the General Directorate of Farms could disseminate this material among producers, this possibility was left under evaluation due to differences in relation to aspects that the guide communicates in an illustrated way and that were not addressed during the design process.
164. Other developed communications products include farm equipment calibration guides, a manual on biobed use, a guide to the identification of natural enemies for horticulture, and dissemination videos on the good agricultural practices conference. These materials constitute a contribution to the activities carried out by the General Directorate of Farms in terms of dissemination and communication with producers and will continue to be used within that framework.
165. The issue of communication and visibility of the project has been addressed in different sessions of the project steering committee without resulting in concrete actions. At the project steering committee meeting on 14 May 2020, the importance of disseminating the results achieved by the project was discussed. Here, it was agreed to generate a

communications strategy. In response, the project developed a base document to align visions among communications staff from the three ministries and identified available funds to support its implementation. However, despite the efforts made to date, there is still no agreement regarding the implementation of a communications strategy for the results of the project.

**Finding 38.** The awareness raising actions developed by the project could have been better focused in terms of topics and target audience. As a result, their effectiveness is still unclear.

166. The project document specifically contemplates the development of a communications strategy to increase awareness of the effects of pesticides on human health and the environment, as well as support the dissemination of good practices. This awareness raising strategy was aimed at students from rural schools, producer associations and the general public. However, the project did not generate this strategy and ended up carrying out communications activities without much order or structure, which did not allow for an evaluation of the effectiveness of the awareness raising process. For example, the activities carried out by the project included: formal training courses aimed at technicians on the application of pesticides; an academic seminar; workshops on good agricultural practices; the dissemination of results from a consultancy on pesticide registration; and talks on pollination in legumes and the safe use of pesticides, among other topics.

167. As mentioned, the assessment of the level of awareness raising carried out by the project shows the need to strengthen its methodology in order to consider the results as valid.

*The rating for knowledge management, communications and awareness raising is moderately unsatisfactory.*

### **3.7 Gender**

**Finding 39.** The project document and the MTR report indicated specific actions related to the gender approach. However, goals related to these measures were neither defined nor included in the results matrix.

168. In the design stage of the project, the gender approach was not considered as a cross-cutting approach to the different stages of its life cycle. This is because it was not a mandatory aspect indicated by the GEF-5 cycle. However, the project document considers this approach in relation to achieving social sustainability of the results, as well as in terms of the communications strategy. However, no goals for compliance were included in the project results matrix.

169. Based on the MTR, and as an initiative of FAO's technical counterparts at headquarters, proposals were made for the inclusion of this approach. The MTR identified the possibility of working in at least three lines: (i) training in the use and application of pesticides, and the impact on health and specific precautions for women; (ii) the incorporation of this information in the communications strategy; and (iii) focusing the work on pesticide labelling regulations and precautions for use by women. Although the MTR proposed modifications to the results matrix, these did not include the incorporation of goals for the proposed activities, nor were they added to the lines of work that were already proposed in the project document.

170. The MTR report indicates that the project already included the gender variable in the record of attendance at the training sessions, and recommended that, if new forms were

developed, the possibility of including new variables should be coordinated with FAO to learn more about the role of women, specifically in terms of the application of pesticides. It should be noted that data collected through the gender variable in the attendance record at the training sessions were not systematically analysed for use as an input by the project.

**Finding 40.** The voluntary nature of the gender approach, combined with the lack of definition of work goals, rendered invisible the importance and need to have specialized human resources that would contribute to the fulfilment of gender results.

171. The absence of goals related to the gender approach hindered the visualization of the importance of having a gender specialist, even after the MTR recommendations.
172. In addition, not having this specialist limited the possibilities of forming a suitable counterpart for the monitoring and review of the only output for which the terms of reference included the incorporation of the gender approach. This output is the Analysis on Perceptions Regarding the Use of Pesticides in Three Agricultural Areas of the Country: Barriers and Opportunities for the GCP/URU/031/GFF Project. The work description indicated the need to include the gender approach in dimensions associated with differences in tasks, access to social, financial, human and productive capital, and roles within rural families, as well as in the selection of specific gender variables and measurable and contextualized indicators. These activities, which would have contributed to a gender analysis from primary sources in relation to the use of pesticides and the perception of associated risks, were not included in the final report beyond a basic description of the integration by sex of the institutions surveyed in the mapping.
173. Based on the MTR recommendations, the PCU requested the assistance of the Gender Advisory Department from the Ministry of Livestock, Agriculture and Fisheries for support in the design and implementation of activities through a gender approach. As a result of this collaboration, the PCU had a work proposal based on this approach in August 2019. However, most of the proposed activities were not implemented. This was partly due to the advanced stage of project execution, the aforementioned lack of specialized personnel dedicated exclusively to these activities, the challenges imposed by the COVID-19 pandemic and government changes.
174. Regarding the gender and generational component in relation to the communications and visibility strategy of the project, it should be noted that the possibilities of carrying out the activities proposed in the project document were limited due to the lack of specialized communications personnel. Although the hiring of a consultant in this matter was evaluated, the project did not reach the necessary agreements between the parties involved to carry out this process.

**Finding 41.** Despite the difficulties faced, the project managed to attract significant participation of women during execution. This highlights the planning and dissemination activities, as well as the strengthening of analytical capacities.

175. Despite the challenges identified in the evaluation, it is possible to point out some very positive achievements by the project in terms of female participation. Since it began its activities, a significant percentage of participants in the training and dissemination activities carried out within the framework of Components 1, 2 and 3 were women. Considering the training and dissemination activities in which gender-disaggregated information was collected (36 activities out of a total of 46 were recorded in the monitoring form),

37 percent of those who participated were women (718 people). In Component 3, which has the largest record of activities disaggregated by sex (30 activities), this percentage reaches 35 percent of the participants (636 women), while in Component 1 (with 5 activities disaggregated by sex), the participation of women exceeded that of men, reaching 58 percent of attendees (69 women). Component 2 records a single activity in which female participation reached 42 percent of the total (13 women). Given the aggregation of data in the monitoring form, it is not possible to discern how many of the total participants were women. This considers the indication in the project document regarding the vulnerability of women involved in activities before and after the harvest of horticultural products.

176. Even more notable is the percentage of female participants in the activities of Component 4 to strengthen analytical capacities. Both in the case of the laboratory of the General Directorate of Agricultural Services of the Ministry of Livestock, Agriculture and Fisheries and the National Directorate of Quality and Environmental Assessment of the Ministry of Environment, there was a high level of female participation in the workforce, even at leadership levels. In the case of the laboratory of the General Directorate of Agricultural Services, all the personnel affected by the project were women, between 24 and 58 years of age (eight people, including two leadership positions and one manager). While, in the case of the laboratory of the National Directorate of Quality and Environmental Assessment, more than half of the team affected by the project were women (four people out of seven, including one leadership position and one manager). Indirectly, this can be considered an achievement in supporting women to assume leadership roles and actively participate in decision-making.
177. Regarding the degree of participation and representation of women in the planning processes of project activities, it is worth highlighting the composition of the working groups that were formed in each component to define some lines of work. In general, however, participation by sex was not equal. It can therefore be considered that the representation of women was high. In total, among the most active members (evaluated at the discretion of the PCU and considering the continuity of links with the project), the participation of women reached 44 percent, highlighting their participation in Component 1 where it reached 60 percent. Considering the segment of those who participated in a less active way, the average participation of women in the four components reached 43 percent (Table 3).

**Table 3. Distribution of members of the working groups by component, according to sex**

Component	More active members			Less active members			Total members		
	Women (%)	Men (%)	Total (n)	Women (%)	Men (%)	Total (n)	Women (%)	Men (%)	Total (n)
1	<b>60%</b>	40%	5	<b>22%</b>	78%	9	<b>36%</b>	64%	14
2	<b>47%</b>	53%	19	<b>46%</b>	54%	46	<b>46%</b>	54%	65
3	<b>38%</b>	63%	16	<b>41%</b>	59%	44	<b>40%</b>	60%	60
4	<b>40%</b>	60%	15	<b>53%</b>	47%	19	<b>47%</b>	53%	34
Total	<b>44%</b>	56%	55	<b>43%</b>	57%	118	<b>43%</b>	57%	173

Source: Authors' own elaboration based on data provided by the PCU.

**Finding 42.** Other important project activities lacked inclusion of the gender approach, even when this was noted in the project document. Regarding a generational approach and the rights of

children and adolescents, there was a lack of emphasis on carrying out activities with children and adolescents from 12 years of age regarding restrictions related to child labour and pesticides.

178. The choice of demonstration farms for the validation of the IPM strategies and other alternatives to the use of pesticides did not include the gender approach. In this regard, the management of the selected farms was mostly in the hands of a male producer, and only in exceptional cases was there female leadership. Beyond the numerical aspects, there were also no guidelines to give visibility and recognition to the work of the production companies when it came to mixed establishments. Also, the testimonial videos made to disseminate these techniques incorporate a very low participation of female producers. Of ten testimonial videos – each featuring the appearance of two people – only two feature a female producer. A third shows a female technician who directs an institute hired by the project. Although she led one of the bioinput studies, her role is not mentioned during the video. This approach represents a lost opportunity to highlight the valuable contribution of women to production from the field to academia.
179. Another weak line of work is identified in the lack of inclusion of rural schoolteachers in awareness raising activities about the risks and negative effects of pesticides. In this area, work was only done in two technical schools, reaching a total of 54 students. Teacher participation was limited to a supporting role, however, in that teachers were not considered a target audience.
180. Finally, it is necessary to point out that the schools worked with children and adolescents from the age of 12 (approximately 70 percent of this segment is made up of students between 12 and 15 years old), without emphasis on the restrictions related to child labour with pesticides. In the training sessions, there was no mention of aspects linked to child labour, nor is it recorded in the guidelines for preventing accidents with pesticides.

**Finding 43.** Weaknesses are identified at the level of the work approach proposed in the project document because of limited analysis of the representation of women in public decisions.

181. Regarding the project activities to support women to assume leadership roles and promote their active participation in decision-making, it should be noted that, in terms of gender at the institutional level, the project document is based on the partial knowledge available at the moment of its preparation. The document points out that, since Uruguay has incorporated the gender dimension in the public sector, women are equally represented and present in public decisions. However, recent studies prepared for the design of the National Gender Plan in agricultural policies (FAO and Ministry of Livestock, Agriculture and Fisheries, 2021) deepen this analysis and identify that, despite the equal and even majority representation of women in institutional agriculture, mechanisms of segregation and asymmetries persist. In this regard, the lack of a broad analysis limited the opportunities in terms of the analysis of the core aspects of gender inequality on which the project could have had an impact.

*The rating for gender is moderately satisfactory.*

### **3.8 Environmental and social safeguards**

**Finding 44.** There are areas for improvement in the plan for the elimination of obsolete pesticides to address all the risks posed by their management and propose the corresponding mitigation measures.

182. The project was classified as having a Category B risk level. This is based on the environmental impact assessment that was carried out during the project formulation phase and included in the project document. This classification indicates that the project should not generate significant (or potentially irreversible) negative impacts on the environment (and associated social aspects), but it could still generate adverse effects that can be mitigated with appropriate preventive actions.
183. In the environmental impact assessment carried out, it was identified that environmental impacts could occur in the case of accidents during the transportation and destruction of obsolete pesticides and the treatment of their empty containers before recycling. To mitigate risks, the project was expected to follow the environmental management toolkits for obsolete pesticides for the protection, transportation and disposal of obsolete pesticides.
184. Although the disposal of obsolete pesticides has not been initiated, the approved OSMP does not include the ERA linked to these stocks, as indicated in the FAO environmental management toolkits for obsolete pesticides (FAO, 2009a; 2009b; 2011a; 2011b). This ERA makes it possible to identify and categorize the sites where obsolete pesticides are found and determine the safeguard measures to be applied. However, the OSMP does not give instructions on how the inventory should be managed on site and transported to the temporary collection centres. It only mentions that the holder is responsible for delivering its inventory to the temporary collection points.
185. This omission represents a risk to the health of the holders and to the environment. This is because it has been reported that 28.4 percent of the containers are damaged but without losses, and that 20.9 percent are in good condition. Regardless, the containers are open, which represents a risk for transportation. The possibility of direct exposure to the holders and contamination of the soil or water is more acute for containers that have leaks (1.3 percent) or for cases where the material is dispersed (0.05 percent), which implies the need to carry out on-site repackaging. In addition, the condition of the packaging is unknown for 10 percent of stocks. The plan does not identify these risks and, consequently, does not provide mitigation measures in this regard.
186. As established in the environmental management toolkits for obsolete pesticides, the safeguarding of stocks must be carried out by highly qualified personnel. According to the interviews carried out by the Evaluation Team, Campo Limpio will hire a specialized company for the execution of the OSMP and the elimination of obsolete pesticides. However, the OSMP does not include on-site repackaging and transportation to the temporary collection centre, and the personnel of the Ministry of Environment and Campo Limpio did not receive the training established by the project for the management of obsolete pesticides. Therefore, there is uncertainty about whether the supervision of the work carried out by the contracted company, or the actions to be implemented, will be done in accordance with the environmental management toolkits for obsolete pesticides, as indicated in the project document.

*The rating for the topic of environmental and social safeguards is moderately unsatisfactory.*



## 4. Main objectives, scope, methodology and findings of Phase 2

187. As indicated, the project was scheduled to be completed in December 2021. This is why FAO OED carried out its evaluation in the second part of 2021. However, in order to facilitate the fulfilment of certain milestones and the achievement of expected results (for example, the implementation of the LOA with Campo Limpio for the elimination of obsolete pesticides [FAO, 2021b]), the project was extended until December 2022, and subsequently until December 2023.
188. FAO OED, in agreement with the PCU and the FAO-GEF Coordination Unit at headquarters, decided to carry out an update in early 2023 to include in the report evidence of the achievements made in the assessment end of it (Phase 2 of evaluation). This section presents an update of the results identified in Phase 1 of the evaluation (report completed in February 2022) to incorporate the results achieved up until project closure. The section is structured to answer four specific questions that seek to identify progress and assess the results achieved in 2022 in the implementation of Components 1, 2 and 4 of the project.

### 4.1 Objectives, scope and methodology

189. The objective of the second evaluation phase was to review and update the results of the first phase by examining and assessing the progress reported by the project as of December 2022. This was with the purpose of accounting for the achievements after the delivery of the report in February 2022.<sup>29</sup>
190. The update covers the period from August 2021 (when the Phase 1 data collection was completed) to the end of 2022, taking as a starting point the findings and conclusions of the first phase of the evaluation. Considering the agreed objective, the review focused on assessing the degree of achievement of the results in the four components of the project. In this regard, the review examined the changes in four evaluative criteria and subcriteria of the GEF on which the review of the findings and respective assessments are based:<sup>30</sup> (i) effectiveness; (ii) progress towards impact; (iii) efficiency; and (iv) sustainability. According to these criteria, the questions that guide the update are:
- i. In 2022, what advances are identified?
  - ii. With the progress identified, what achievements and results have been achieved at the level of each component?
  - iii. Considering the results achieved as of 2022, what preliminary signs of impact can be identified by the project's contribution?
  - iv. How sustainable are the results achieved to date?
191. To answer these questions, FAO OED carried out a desk review of the evidence reported by the project as of December 2022. This included progress reports, letters, agreements and contracts from the project outputs, and co-financing reports. To clarify doubts about

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<sup>29</sup> Phase 1 of the evaluation covered from the beginning of project implementation to August 2021.

<sup>30</sup> The ratings of the evaluated criteria are presented in the executive summary and Appendix 2.

the information and obtain their perspectives on the progress of the project, meetings and exchanges were held with personnel from the PCU in Uruguay and the FAO-GEF Coordination Unit at headquarters. Also, the views and comments of government entities involved in the evaluation were requested, including the focal point in the Ministry of Environment.

192. The limitations arise mainly from the fact that this is a desk review, and that the project at the time of the review was still implementing some activities – especially a Component 1 output.

## 4.2 Findings – Effectiveness

193. This section presents the progress reported by the project for Components 1, 2 and 4 in the final report for the period from July 2021 to June 2022, and in the note delivered by the PCU staff for the update. Here, relevant progress and achievements are reported during 2022 that were not considered in the findings of Phase 1 of the evaluation (February 2022).<sup>31</sup>
194. At the end of the information collection process, authorization from the Ministry of Environment was pending for the creation of an appropriate warehouse for storing obsolete products until their effective disposal. At the end of 2021, the agreement was signed between the government and the private sector for the elimination of these products. As a result, some important steps were taken towards achieving the expected outputs, mainly **Component 1: stock reduction and the elimination of obsolete pesticides and containers**.
195. Among these milestones is the signing of the agreement between FAO and the Campo Limpio civil association for the provision of the environmentally sound disposal service for obsolete pesticides within the framework of the OSMP. Environmental authorization was also given for the company, Krile S.A., to expand its incineration capacity at the local level (Veolia Uruguay Krile S.A., 2022). This enabled the signing of the contract between Krile and Campo Limpio to carry out the elimination proposal. In addition, actions for the collection and recycling of packaging were carried out.
196. Regarding **Component 2: strengthening the legal framework and institutional capacity for the rational and comprehensive management of pesticides during their life cycle**, the project team reported preliminary progress with updates based on the proposals for improvement in the National Registry of Pesticides. During 2022, the Ministers of Environment and Livestock, Agriculture and Fisheries announced the signing of the agreement to incorporate the ERA in the National Registry of Pesticides.
197. Within the framework of **Component 4: strengthening environmental monitoring and response to risks of hazardous pesticides**, an LOA was signed in December 2021 to environmentally monitor pesticides in the San Salvador (Soriano) basin (FAO, 2022). The Foundation for the Development of Basic Sciences carried out three of the four field campaigns during 2022.

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<sup>31</sup> No reported progress is identified for Component 3: reduction in the use of toxic pesticides through the adoption of the IPM and other alternatives.

**Finding 45.** Based on the progress identified, among the main achievements is the progress towards reducing the risk to human health and the environment. This comes mainly from progress in the elimination of obsolete pesticides. In addition, capacities for local pollution management and environmental monitoring have been strengthened. The pending agenda includes updating the regulatory framework.

198. Details of achievements by component are discussed below.

#### **4.2.1 Component 1: stock reduction and elimination of obsolete pesticides and containers**

199. Outcome 1.1 shows continuous progress towards reducing the risk to human health and the environment due mainly to the beginning of the implementation of the OSMP and the elimination of pesticides. This last result is very relevant since several challenges identified in Phase 1 of the risk reduction assessment were overcome.

200. With the beginning of the implementation of the OSMP, one of the essential requirements for elimination was met. First, the selection and prioritization of obsolete stocks to be managed with the funds committed to the agreement were carried out. In this regard, through the LOA signed between FAO and Campo Limpio (FAO, 2021b), the evaluation of obsolete pesticide stocks was carried out in 2020 and a series of criteria were defined based on the goal of destroying 14 t of pesticides with project resources. Second, the elimination proposal was reviewed and the workplan defined with the signing of the contract between Krile and Campo Limpio. This enabled the start of the execution of the plan.

201. The destruction of obsolete pesticides in the country represented another important step towards risk reduction since it gives the option of elimination within the national territory. With the environmental authorization granted to Krile, the company's incineration capacity was enabled and expanded at the local level (Veolia Uruguay Krile S.A., 2022).<sup>32</sup> This milestone is highlighted by the Ministry of Environment as offering a local solution, which reduces costs and minimizes external dependence, as well as the risk in handling pesticides for export. To date, there has been progress of approximately 18 percent in the environmentally sound disposal of obsolete pesticides, including POP.<sup>33</sup> On the monthly incineration capacity,<sup>34</sup> it was estimated that the total prioritized stocks would be eliminated by December 2023.

202. Additionally, progress continued in strengthening the management of empty containers. In 2022, container collection days were added in four different areas of the southwest of the country.<sup>35</sup> These activities involved approaching 125 producers and collecting 5 000 kg of plastic containers. This initiative is important to the extent that it represents a collection

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<sup>32</sup> The modification of the environmental permit was approved to increase the operational capacity of the incinerator furnace from 50 kg/h to 135 kg/h and from 17 600 kg/month to 50 000 kg/month.

<sup>33</sup> In the note submitted by PCU personnel for review, the storage and incineration of 243 kg of obsolete pesticides was reported, with the corresponding destruction certificates, and the shipment for destruction of 2 334 kg, with the destruction certificates pending.

<sup>34</sup> The project reported a monthly incineration capacity of 2 000 kg/l per month of obsolete pesticides, giving priority to products with halogen components (chlorine, boron, fluorine and iodine) representing less than 2 percent of the ingredients. If this is exceeded, then they must be diluted by increasing their disposal volume and incineration time.

<sup>35</sup> These are: the Rural Development Association of Tala (Canelones); Punta Espinillo (Montevideo); Tropezón (Canelones); and the Rural Development Association of Canelón Chico (Canelones).

alternative for producers with limited access to collection centres and contributes to the strengthening of the packaging management system, as identified in Phase 1 of the evaluation.

203. An assumption for the objective of Outcome 1.2 (enabling the destruction of pesticides in the national territory) is the existence of capacities for local pollution management, as well as the development of national infrastructure for the disposal of stockpiles. In this regard, the training of government and Campo Limpio personnel responsible for the supervision and execution of the OSMP is required to guide and supervise the work carried out by the contracted company.

#### **4.2.2 Component 2: strengthening the legal framework and institutional capacity for rational and comprehensive management of pesticides during their life cycle**

204. As part of Outcome 2.1 on improvements to the regulatory framework for the environmentally sound management of pesticides, progress was made with the political agreement between the ministries for the implementation of the ERA in the registry. It is important to highlight that the implementation of the proposals developed by the project remains under discussion as part of the collaborative work between the ministries.

205. As identified in Phase 1 of the evaluation, proposed regulations covering the five stages of the pesticide life cycle have been generated. However, challenges to their approval and implementation remain. Such is the case of the proposal to improve the National Registry of Pesticides, which has not reached consensus on its content. However, it should be noted that this is still on the work agenda and efforts are identified to advance the implementation of the ERA, as one of the main elements considered to strengthen the registration system based on the political agreement and collaboration between the Ministry of Livestock, Agriculture and Fisheries and the Ministry of Environment.

206. Furthermore, the project reports that the Ministry of Livestock, Agriculture and Fisheries has initiated some updates based on the proposals developed. The workplan for 2023 includes actions to generate coordination mechanisms and the development of strategies focused on improving the National Registry of Pesticides and the environmental, agronomic and health risk assessment process (FAO and Ministry of Environment, 2023). Additionally, concrete actions to implement these improvements have been included within the framework of a project that will begin execution in 2023.<sup>36</sup>

#### **4.2.3 Component 4: strengthening environmental monitoring and response to risks of hazardous pesticides**

207. To achieve Outcome 4, work continued to increase the capacity for monitoring pesticide risks. Based on the information reported, it is evident that analytical capabilities have been strengthened through a more comprehensive approach and by capturing lessons learned.
208. As a result of the second monitoring programme executed in the San Salvador River (FAO, 2022), progress in monitoring capacity is evident through a more intensive effort compared

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<sup>36</sup> This refers to the Strengthening Investment for the Adoption of Alternatives and Sustainability Management of Agrochemicals and Agroplastics in Africa and Latin America through Pilot Projects in Kenya and Uruguay project (GEF 10902-FARM).

to the previous programme. The expansion of the matrices monitored (water, fish, bivalves and pollinators)<sup>37</sup> and a more comprehensive approach to evaluating the impact of pesticides, which includes the application of lessons learned and the improvement of analytical protocols, have contributed to this achievement.

209. In addition, collaborative work with government actors is reported. For example, the carrying out of water and sediment sampling with the technical staff of the National Directorate of Environmental Quality and Evaluation and State Sanitary Works, facilitated the taking and transfer of samples to the Environmental Laboratory of the Ministry of Environment (FAO, 2022). Additionally, a workshop was held where data on the presence or absence of pesticides in the monitored matrices was presented. However, the processing of data and the analysis of information is still pending.
210. The above represents progress towards the challenges identified in Phase 1 of the evaluation related to institutional coordination.<sup>38</sup> However, rigorous measurement of progress in the indicator remains a challenge, which would allow for the increase in monitoring capacity to be assessed to determine the current level of capabilities and future needs.

*Considering the reported progress, the overall rating for the effectiveness criterion is moderately satisfactory.*

### **4.3 Efficiency**

211. At the end of 2022, the project requested a new extension through an amendment with the objective of extending its term until 31 December 2023 (FAO and Ministry of Environment, 2023). This amendment details the budget and specific actions to be carried out during 2023. In addition, it includes a further contribution from the Uruguayan Government totalling USD 1 197 344.
212. As of March 2023, close to 99 percent of the GEF contribution (USD 1 868 154) had been executed. This represents an increase in budget execution of 0.08 percent compared to what was reported in Phase 1 of the assessment. In total, the project had an initial budget of USD 9 132 028, which includes the GEF contribution of USD 1 874 028 and the contribution of the executing partners (co-financing), corresponding to USD 7 258 000.
213. According to the project information, some factors remain that influence and continue to limit the execution of the outputs. This is associated with a lack of definition by the authorities or delays in processes and approvals, mainly under Components 1 and 2.

*Due to the above, the rating for the efficiency criterion is maintained at moderately unsatisfactory.*

### **4.4 Progress towards impact**

**Finding 46.** In 2022, the project has made progress in its contribution to the expected impact mainly due to advances in the elimination of pesticides. Despite not fully achieving its goal, the

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<sup>37</sup> The first monitoring activity carried out in the Laguna del Cisne basin (Canelones) covered three environmental matrices: water; sediments; and fish.

<sup>38</sup> According to Phase 1 of the evaluation, the standardization of methods or techniques is an element that facilitates or contributes to the harmonization of procedures. However, standardization per se does not imply coordination or harmonization.

processes to achieve the expected impact were initiated and are expected to continue after project closure. Greater progress in risk reduction will depend largely on compliance with the workplan and monitoring of the elimination proposal.

214. In addition to the progress in the management of pesticide containers, the project has generated important contributions to reducing the risk to human and environmental health through advances in the elimination of obsolete pesticide stocks. This is the main environmental benefit expected from the project. In fact, this is attributed to the previously identified results, particularly the start of the implementation of the OSMP and the elimination of pesticides with the project resources.
215. Also, the M&E processes and mechanisms must be monitored to guarantee the prevention and mitigation of risk in local transportation and handling. This is not mentioned in the current OSMP, especially without an approved ERA. To this end, it is necessary to update the OSMP, modifying the plan based on advances in the inventory of pesticides and the strengthening of the regulatory framework. It is important to mention that the workplan for 2023 included budget allocations for actions that would contribute to this process. This involves updating pesticide stocks, supervision, monitoring and providing support during the start of operations within the framework of the OSMP.

*Considering the progress achieved, the rating for the progress towards impact criterion is moderately satisfactory.*

## 4.5 Sustainability

**Finding 47.** In addition to the previously mentioned benefits related to the development of monitoring capacities, the strengthening of packaging management and the dissemination of alternatives to toxic pesticides, the benefits derived from the elimination of obsolete pesticide stocks are added. These benefits are estimated to continue considering the private sector mandate and the project's contribution to monitoring operations and supporting the implementation of the OSMP. Considering the capacities developed and the institutional environment, it is expected that the results will be sustainable once the project is completed.

216. The project has taken important steps to achieve the social and environmental benefit of reducing the risk posed by obsolete pesticides with the start of the collection and disposal of pesticides. It is considered that this benefit will continue once the project is completed since it is a legal mandate of the private sector. This is based on Decree 151/201 and the enabling of key conditions for the implementation of the OSMP, such as the definition of processes, agreements, and the promotion of management and elimination capacity of identified stocks.
217. The development of institutional capacities in pollution management and environmental monitoring is another factor that promotes the sustainability of the results. In parallel, it is reported that the private sector (Campo Limpio) is taking steps to ensure compliance with its obligations under the OSMP, for example, through the revalidation or extension of the useful life of obsolete products. To date, 943 kg of obsolete products have been sent for chemical analysis for reformulation to extend their expiration and use dates.
218. The remaining challenges are the improved regulatory framework, especially considering the importance of the ERA for the definition and monitoring of safeguards and the updating of the pesticide registration system. Among the factors that promote the sustainability of the results achieved are:

- i. the political interest and willingness of the authorities – consensus has not been reached on some of the key outputs, but the topic remains on the agenda;
- ii. the budget allocation commitments for the supported processes and initiatives with co-financing provided for the extension of the project;
- iii. the existence of a strategy to provide continuity to the processes generated, for example, through a new project to continue the work that has already begun,<sup>39</sup> and
- iv. the promotion of institutional learning among partners to strengthen strategies based on the experience of the project in the use of protocols and good practices for monitoring pesticide contamination.

*The rating for the sustainability criterion remains moderately likely.*

219. The evidence reported by the project confirms that progress has been made in the implementation of the OSMP, including the elimination of pesticides from January to December 2022. This suggests a contribution to reducing the risk to human and environmental health derived from pesticides that is greater than the contribution estimated in Phase 1 of the evaluation. Therefore, some of the ratings assigned in February 2022 to the GEF project evaluation criteria have been revised based on the evidence presented in this document, resulting in an overall rating of the project as moderately satisfactory.

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<sup>39</sup> This refers to the proposal to include this topic in the Strengthening Investment for the Adoption of Alternatives and Sustainability Management of Agrochemicals and Agroplastics in Africa and Latin America through Pilot Projects in Kenya and Uruguay project (GEF 10902-FARM) to be implemented in 2023.



## 5. Conclusions and recommendations

### 5.1 Conclusions

**Conclusion 1.** The project started the process to achieve a common approach among the productive, health and environmental sectors regarding pesticides and their comprehensive management. However, more support and efforts are required to continue this work and achieve this objective.

220. The project started the process to integrate productive, environmental and health approaches that strengthen the management of pesticides based on their life cycle. This had not been addressed in the country and is considered a priority. However, more projects, actions and political will are needed to achieve the expected impact.

**Conclusion 2.** The objective, strategy and results of the project remain relevant.

221. The national priorities established by Uruguay's new government prioritize sustainable agricultural intensification and the importance of caring for the environment. This is expressed, among other actions, in the creation of the Ministry of Environment, which is in line with the project's objectives. The concept and results of the project are also relevant considering FAO's strategic, regional and country-level objectives aimed at more productive and sustainable agriculture. The project is also in line with the goal of the GEF chemicals strategic area (Cycle 5) aimed at promoting the rational management of chemicals to minimize their adverse effects on human health and the environment.

**Conclusion 3.** The project made progress towards strengthening pesticide management and reducing the risk they represent.

222. The project has strengthened the management of empty pesticide containers, identified effective IPM strategies and alternatives to hazardous pesticides, and significantly strengthened capacities for pesticide monitoring, among other achievements. However, the process of destroying the identified obsolete pesticides has yet to be completed, and the approval of specific regulations, including the proposal to strengthen the registration of pesticides, is pending.

**Conclusion 4.** Project progress needs to be continued and strengthened in order to constitute a solid foundation towards reducing the risks of pesticides. This involves focusing on obsolete stocks to achieve the expected global environmental benefits.

223. The bases for the integrated and effective management of pesticides must be strengthened to significantly reduce the risks to human health and the environment that they represent. This includes compliance with the workplan and monitoring of the elimination proposal, as well as the effective strengthening of the regulatory framework.

**Conclusion 5.** Some environmental, institutional and financial risks are identified.

224. The risk posed by empty pesticide containers has been reduced and progress has been made towards reducing the environmental and human health risk posed by obsolete pesticide stocks – even though the risk remains until progress is made towards their elimination. In addition, the active participation of academia and the private sector, as well as the materialization of different sources of government and private co-financing during

the project's life cycle, are positive aspects for sustainability and the future scope of the expected impacts.

**Conclusion 6.** Areas for improvement are identified to strengthen the OSMP and ensure that it includes all safeguard actions to prevent environmental and social risks.

225. The OSMP should be strengthened by including an ERA of the sites where obsolete pesticide stocks are located in order to support environmental and social safeguard actions. It will also require a possible update to include the most recent pesticide inventory figures.

**Conclusion 7.** The committed co-financing was exceeded.

226. The project reported the materialization of co-financing that is greater than the committed amount at the beginning of the project. Formalizing the official report of the provided final co-financing is all that is necessary. However, in the future, there are financial risks linked to government budget cuts.

**Conclusion 8.** The efficiency of the project was limited due to some institutional and administrative difficulties and the COVID-19 pandemic.

227. Project execution was extended by more than two years, mainly due to the intrinsic difficulties of executing a project with a multisector approach. The COVID-19 pandemic also generated some budget restrictions, which affected its efficient implementation.

**Conclusion 9.** The implementation and execution of the project was affected by the inherent complexity of the multisectoral approach and technical and institutional aspects.

228. The inherent complexity of the project's multisectoral approach – which seeks to integrate productive, environmental and health approaches to pesticide management – and the need for a more elaborate strategy to achieve a common project vision and closer technical supervision generated limitations in project implementation.

**Conclusion 10.** The M&E plan meets most of the requirements for monitoring a GEF project. However, areas for improvement in its execution were identified.

229. The project generated tools and complied with the progress reports required for monitoring. However, some indicators were not SMART. This made results-based monitoring difficult. Also, the development of methodologies to measure some of the project results fell short, and the PPR shows areas for improvement.

**Conclusion 11.** Overall, the stakeholder engagement mechanisms implemented during the project were successful.

230. The project formed working groups at the beginning of execution to agree on the details of the project activities. Some of these groups remained in operation until the tasks were completed and others were dissolved once the actions had been planned. Thus, the stakeholder engagement mechanisms implemented by the project were mostly successful.

**Conclusion 12.** The project achieved significant participation of women in the project's training and dissemination activities. However, in other activities, there was a lost opportunity to make the role of rural women more visible.

231. Considering the voluntary nature of incorporating the gender approach in the project and that the recommendation to incorporate it was made after the MTR, the project showed

significant participation of women in the training and dissemination activities carried out. However, in activities linked to IPM promotion, the role of rural producers was not made visible or strengthened – nor were rural teachers trained on the risks of pesticides, as planned in the project document.

**Conclusion 13.** The lack of updated data on the gender situation during the project document preparation phase prevented a more robust analysis regarding women's participation in public decisions.

232. The lack of specific and updated gender statistics during project document preparation, particularly on the representation of women in public decisions, limited opportunities for the analysis of the core drivers of gender inequality. The project could have had an impact on these. As a result, this weakened the proposed gender mainstreaming approach in the project design phase.

## 5.2 Recommendations

### 5.2.1 For the project

**Recommendation 1.** For the Ministry of Environment and Campo Limpio.

233. Update the OSMP to include the evaluation of environmental risk linked to obsolete pesticide stocks. This evaluation will allow for the risks at each site to be identified and categorized according to the risk that they represent. Based on this categorization, specific safeguards must be implemented to prevent accidents during the handling of obsolete pesticides and their containers at their place of origin and during their transportation to the temporary collection centres for their final disposal.

234. Update pesticide inventory data.

**Recommendation 2.** For FAO Uruguay.

235. In order to ensure the sustainability of the project results and further guide the work towards the expected impacts, follow up on the proposed regulations prepared by the project. This includes promoting the agreement between the Ministry of Environment and the Ministry of Livestock, Agriculture and Fisheries so that they continue to make improvements to the pesticide registration system in the country based on the proposal prepared by the project.

236. Ensure compliance with the workplan and monitoring of the elimination proposal.

**Recommendation 3.** For FAO Uruguay and co-financing partners. Formalize the report of the final co-financing from the co-financing partners by delivering a signed letter about the final amount provided and the items covered by the co-financing. This step should form part of a broader discussion on the role that co-financing partners will have in ensuring the sustainability and expected impact of the project.

### 5.2.2 For future projects

**Recommendation 4.** For FAO technical units, the FAO-GEF Coordination Unit and government partners. When the project's objective and strategy involve combining the visions of the productive sector with the environmental and health sectors, the following actions are suggested, as permitted by national regulations.

237. Ensure that project partners representing the productive, environmental and health sectors are effectively involved during project formulation and that a common vision is achieved among them regarding the objective, approaches and scope of the project and its benefits for all three sectors.
238. Government partners in these sectors must serve as co-executing partners of the project with an equal level of responsibility and the same weight in decision-making.
239. FAO's direct execution modality should be considered.

**Recommendation 5.** For FAO technical units, the FAO-GEF Coordination Unit and government partners. In projects with a comprehensive scope that includes topics covered in the GEF chemicals focal area, strengthen the analysis of the legal framework and governance in the country or region where the activities will be implemented in order to mitigate the risks involved due to the lack or limitations of such a framework for the execution of certain tasks (for example, the remediation of contaminated sites).

**Recommendation 6.** For FAO (Chief Technical Officer, Funding Liaison Officer, FAO-GEF Coordination Unit). Strengthen and remind project implementers regarding the importance of the start-up workshop to review the M&E plan and identify the information needs to be generated, especially the methodologies and indicators used, in order to allow for the robust assessment of progress towards the expected outputs and outcomes. In addition, strengthen the review process of the semi-annual reports and PIRs of the project to ensure that they objectively reflect the results, changes and progress towards the expected impacts.

**Recommendation 7.** For FAO and co-executing partners. It is recommended that, for the preparation of the initial gender analysis, which will support the strategy and workplan of new projects, project design participants are encouraged to make use of existing studies or carry out specific quantitative and qualitative studies (primary data). This will allow for the collection of solid evidence for an effective analysis and work strategy.

## 6. Lessons learned

**Lesson 1.** A participatory work approach, especially when dealing with potential conflict, takes a greater amount of time. This, however, is essential for the different actors to take ownership of the outputs, which then ensures the sustainability of the results.

**Lesson 2.** The Mobile Collection Centre for empty pesticide containers is a useful initiative to collect containers in remote areas.

**Lesson 3.** Formalizing changes to the results framework by including them in annual progress reports should be a priority. This is to effectively report changes to the project strategy and present their reasoning to the resource partner.

**Lesson 4.** The use of secondary data, which is generated by third parties for other objectives and is not updated, limits the adequate targeting of work strategies – especially for gender statistics that are usually limited or obsolete.

**Lesson 5.** The use of the results framework to report compliance with the indicators of the GEF monitoring tool for POP, instead of using the tool itself, limits the usefulness of the tool for the PCU's monitoring of the project.

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## Appendix 1. List of people interviewed

No.	Last name	First name	Position	Organization/location	Sex
1	Andrés	Eduardo	Director	Ministry of Environment, National Directorate of Quality and Environmental Assessment (former National Directorate of the Environment)	M
2	Arrospide	Guillermo	Vice-President	National Chamber of Fertilizers and Phytosanitary Products	M
3	Banchero	Luján	Official	Ministry of Livestock, Agriculture and Fisheries, General Directorate of Farms	F
4	Barboza	Natalia	Director	Ministry of Environment, Environmental Laboratory (National Directorate of Quality and Environmental Assessment, former National Directorate of the Environment)	F
5	Bascou	Gabriel	Coordinator	Chamber of Commerce of Agrochemical Products of Uruguay	M
6	Basso	Cesar	Researcher	University of the Republic, Faculty of Agronomy	M
7	Bonomi	Laura	Manager	Ministry of Environment, National Directorate of Quality and Environmental Assessment, Environmental Complaints System	F
8	Camaño	Lorena	Representative of Proquimur S.A.	Chamber of Industries of Uruguay (Association of Chemical Engineers of Uruguay)	F
9	Camelo	Lucia	Coordinator	Barraca Erro, Research and Development	F
10	Capandeguy	Facundo	President	Siembra Directa Association	M
11	Carabio	Magdalena	Coordinator	Vida Silvestre	F
12	Carámbula	Matías	Director	Development Agency of the Canelones Municipality	M
13	Cárcamo	María	Coordinator	Action Network on Pesticides and their Alternatives for Latin America, civil society organization	F
14	Casaux	Gastón	Director	Ministry of Public Health, Environmental and Occupational Health	M
15	Castro	Marcelo	Assistant	Ministry of Public Health, Environmental and Occupational Health	M
16	Cesio	Verónica	Researcher	University of the Republic, Faculty of Chemistry	F

Appendix 1. List of people interviewed

No.	Last name	First name	Position	Organization/location	Sex
17	Chiaravale	Willy	Private consultant	ENTOAGRO S.R.L., private sector	M
18	Ciganda	Carmen	Ex Director	Ministry of Public Health, Environmental and Occupational Health	F
19	Correa	Arturo	International consultant	FAO	M
20	Da Silva	Rúben	Representative of Cibeles	Chamber of Industries of Uruguay (Association of Chemical Engineers of Uruguay)	M
21	De Amores	Fernando	Beneficiaries	Other producers to be identified during the evaluation process, beneficiaries	M
22	de Hegedüs	Pedro	Ex Assistant Director	Ministry of Livestock, Agriculture and Fisheries, General Directorate of Agricultural Services (including laboratories)	M
23	Enrich	Nora	Official	Ministry of Livestock, Agriculture and Fisheries, General Directorate of Farms	F
24	Falco	Sebastián	Project team	FAO	M
25	Fernández	Juan Andrés	Representative of Cibeles	Chamber of Industries of Uruguay (Association of Chemical Engineers of Uruguay)	M
26	Fernández	Grisel	Researcher	University of the Republic, Faculty of Agronomy	F
27	Galván	Guillermo	Researcher	University of the Republic, Faculty of Agronomy	M
28	García	Alejandro	Researcher	INIA	M
29	Garrido	Jorge	Beneficiaries	Other producers to be identified during the evaluation process, beneficiaries	M
30	Giménez	Cristina	Inspector	Ministry of Labour and Social Security	F
31	González	Marina	Communications expert	FAO	F
32	González Riggio	Valeria	Natural Resources Officer	FAO-GEF Coordination Unit	F
33	Guala	Gabriel	Project team	FAO	M
34	Heinze	Horacio	Researcher	University of the Republic, Faculty of Medicine and Chemistry	M
35	Hughes	Alex	Director	Ministry of Livestock, Agriculture and Fisheries, Department of Input Control, General Directorate of Agricultural Services	M
36	Invernizzi	Aldo	Manager	Campo Limpio civil association	M

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No.	Last name	First name	Position	Organization/location	Sex
37	Laborde	Amalia	Researcher and Director of the Toxicological Information and Advice Centre	University of the Republic, Faculty of Medicine and Chemistry	F
38	Lombardo	Laura	Director	Ministry of Livestock, Agriculture and Fisheries, Analysis and Diagnostic Division, General Directorate of Agricultural Services	F
39	López	Fernando	National consultant	Teacher of the training plan: proper, safe and effective pesticide use	M
40	Malan	Alejandra	Beneficiaries	Other producers to be identified during the evaluation process, beneficiaries	F
41	Malan	Tito	Beneficiaries	Other producers to be identified during the evaluation process	M
42	Mañay	Nelly	Researcher	University of the Republic, Faculty of Medicine and Chemistry	F
43	Martínez	Daniel	Official	Ministry of Livestock, Agriculture and Fisheries, General Directorate of Farms	M
44	Olivera	Leonardo	Director	Ministry of Livestock, Agriculture and Fisheries, General Directorate of Agricultural Services	M
45	Olivet	Juan	National consultant	University of the Republic, Faculty of Agronomy, Pesticide Application Technology Course in fruit trees and horticulture	M
46	Pastori	Margarita	Beneficiaries	Colonia Valdense development association	F
47	Perminova	Oxana	Lead Technical Officer	FAO	F
48	Perugorría	Ana	National consultant	Agricultural Planning Institute	F
49	Plata	Vicente	Officer in charge of FAO Uruguay	FAO Uruguay	M
50	Queheile	Natalia	Technical team	Ministry of Livestock, Agriculture and Fisheries, Department of Input Control, General Directorate of Agricultural Services	F
51	Righi	Emilio	Project team	FAO	M
52	Rodríguez	Alda	Director	Batoví Organic Institute, Uruguay International (BioUruguay)	F
53	Salta	Vivian	Programme assistant	FAO Uruguay	F
54	Souteras	Federico	GEF focal point in the Ministry of Environment	Ministry of Environment, Department of Solid Waste (National Directorate of	M

Appendix 1. List of people interviewed

No.	Last name	First name	Position	Organization/location	Sex
				Quality and Environmental Assessment, former National Directorate of the Environment)	
55	Stebniki	Samanta	Project team	FAO	F
56	Teixeira de Mello	Franco	Researcher	University of the Republic, Eastern Regional University Centre	M
57	Viera	Juan Pablo	Technical assistant	Fadisol S.A.	M
58	Viroga	Sebastián	Project team	FAO	M
59	Zaldúa	Natalia	Coordinator	Vida Silvestre	F
60	Zoppolo	Roberto	Researcher	INIA	M
61		León family	Beneficiaries	Other producers to be identified during the evaluation process	M

## Appendix 2. The GEF evaluation criteria rating table

The GEF criteria/subcriteria	Rating	Summary comments
<b>A. STRATEGIC RELEVANCE</b>		
A1. Overall strategic relevance	S	The strengthening of the management of pesticides, including obsolete and highly hazardous pesticides, throughout their life cycle remains a priority.
A1.1. Alignment with the GEF and FAO strategic priorities	S	The results of the project contribute to the promotion of environmentally sustainable agriculture and show progress towards reducing risks due to the use of chemical substances.
A1.2. Relevance to national, regional and global priorities and beneficiary needs	S	There is an alignment of the concept and results of the project with the policy of the sustainable intensification of agriculture of the Uruguayan Government and with its interest in promoting sustainable agrifood systems.
A1.3. Complementarity with existing interventions	S	The project is aligned with initiatives of research centres, companies and producers that allowed for the successful validation of the IPM practices and alternatives to dangerous pesticides.
<b>B. EFFECTIVENESS</b>		
B1. Overall assessment of project results	MS	Among the results achieved is the development of capacities in local pollution management and environmental monitoring, and progress towards reducing the risk to human health and the environment due to the elimination of pesticides. However, the remaining challenges include continuing to strengthen the regulatory framework and guarantee risk reduction in compliance with the workplan and adherence to the elimination proposal.
B1.1 Delivery of project outputs	MS	Important outputs were achieved, such as strengthening the management of empty pesticide containers, validating the IPM strategies and alternatives to highly toxic pesticides, and developing inventories of obsolete pesticides and environmental monitoring capabilities. Among the outputs not achieved, or partially achieved, is strengthening government training on the management of obsolete pesticides and the development of a communications strategy to raise awareness about the risks of pesticides.
B1.2 Progress towards outcomes and project objectives	MS	Progress has been made towards the outcomes and objectives of the project through risk reduction, mainly due to the implementation of the OSMP and the elimination of pesticides. However, it is necessary to move forward with the approval of the proposed regulations to strengthen the regulatory framework for pesticides and management throughout their life cycle, which is the second component of the project objective.
Outcome 1.1. Reduced risks to human health and the environment through the safe disposal of POP and other obsolete pesticides, and by developing capacity in the remediation of pesticide-contaminated soils	MS	Progress is identified in risk reduction with the implementation of the OSMP through the signing of the contract between Campo Limpio and Krile, and the start of the elimination of pesticides. However, the workplan needs to be strengthened and adequate compliance with the technical proposal must be guaranteed to identify and measure risk reduction.
Outcome 1.2. Capacities developed in local pollution management	S	Through the development of a guide, training was provided on how to respond to incidents and accidents due to the use of pesticides. The objective was met.

Appendix 2. The GEF evaluation criteria rating table

The GEF criteria/subcriteria	Rating	Summary comments
Outcome 2.1. Improved legal and regulatory framework for the environmentally sound management of pesticides	MS	There are regulatory proposals, but these have not been approved and, therefore, are not supported with a budget allocation. The proposals remain under discussion as part of the collaborative work between the ministries. The objective was partially met.
Outcome 3.1 Reducing the use of toxic pesticides through the adoption of integrated pesticide management and other alternatives	UA	The project identified practices that reduce pesticide use. However, the reduction could not be measured because it was not within the project's scope to ensure the adherence of trained producers to the practices taught. The Evaluation Team is aware that, at least in the demonstration properties, the use of pesticides was reduced. However, it was not possible to estimate the total reduction, which, according to the project document, should have been at least 200 t.
Outcome 3.2 Increased awareness about the effects of conventional pesticides and available alternatives	UA	The project carried out training and dissemination actions. However, to measure the increase in awareness about the effects of pesticides, it used a weak methodology and, due to the cancellation of the field mission as a result of the COVID-19 pandemic, the Evaluation Team interviewed a small number of producers. This prevented it from giving an opinion on the matter.
Outcome 4.1 Increased capacity for timely monitoring and response to pesticide risks to human health and the environment	MS	Analytical and personnel capacities were developed in the laboratories of the Ministry of Livestock, Agriculture and Fisheries and the Ministry of Environment. The second monitoring programme was broader and more comprehensive, with progress made towards meeting the challenges of institutional coordination.
Overall rating of progress towards achieving project outcomes/objectives	MS	Progress was made towards risk reduction, strengthening pesticide management such as proposed regulations, strengthening the empty container management plan, and developing effective IPM practices. It is necessary to move towards increased risk reduction through the elimination of compromised pesticides and advance in other areas such as strengthening the regulatory framework. Monitoring is required to ensure compliance.
B1.3 Likelihood of impact	MS	The project has made progress towards the expected impact, mainly through its advances in pesticide elimination. Despite not achieving the overall target in terms of pesticide elimination, the processes to achieve it were initiated. Future progress in risk reduction will depend largely on compliance with the workplan and monitoring of the elimination proposal. It is necessary to monitor the outputs and results achieved by the project towards the expected impact.
<b>C. EFFICIENCY</b>		
C1. Efficiency	MU	The project was extended by more than two years, with budget under execution and some outputs and outcomes not yet achieved or measured. This situation is mainly the consequence of a poor response capacity and the lack of definition of some government partners' roles in the project. This caused delays in the development of activities alongside the COVID-19 pandemic, which limited the available resources from the Ministry of Environment and delayed the execution of some activities.
<b>D. SUSTAINABILITY OF PROJECT OUTCOMES</b>		

Terminal evaluation of the project “Strengthening the Environmentally Sound Management of Pesticides, Including Persistent Organic Pollutants”

The GEF criteria/subcriteria	Rating	Summary comments
D1. Overall likelihood of risks to sustainability	ML	The institutional and financial risks for the sustainability of the results are moderate to low. In addition, the active participation of academia and the private sector, as well as the materialization of different sources of co-financing during the life of the project, are positive aspects for the sustainability of the results achieved. To this end, FAO's continued advocacy will be essential, particularly in relation to the need for a multisector approach that is open to the private sector and academia.
D1.1 Financial risks	ML	Financial risks are low since elimination costs will be covered by the private sector, as will actions to continue the management of empty containers.
D1.2 Sociopolitical risks	ML	The COVID-19 pandemic generated a change in priorities at a global and national level, and its evolution generated unexpected changes to government planning.
D1.3 Institutional and governance risks	ML	The institutional tension between the Ministry of Environment and the Ministry of Livestock, Agriculture and Fisheries is the greatest governance risk. The project has supported dialogue between the authorities of both ministries, and the authorities of the new government have shown greater interest in addressing these issues.
D1.4 Environmental risks	MU	Progress was made in reducing environmental risks by strengthening the empty pesticide containers programme and laboratory monitoring capabilities, and starting the elimination of obsolete pesticides. However, there remain certain environmental risks derived from local transportation and handling, which were not identified in the OSMP, especially without an approved ERA. This evaluation must be carried out in the sites where obsolete pesticides are located.
D2. Catalysis and replication	MU	The need for new legal and management bases to ensure environmental protection and health services while promoting agricultural development implies important risks for strengthening pesticide management in the country considering their life cycle.
<b>E. FACTORS AFFECTING PERFORMANCE</b>		
E1. Project design and readiness	MU	The project addresses an issue of great relevance to the country's environmental and productive sector. However, it was designed without completely achieving a common vision between the Ministry of Livestock, Agriculture and Fisheries and the Ministry of Public Health.
E2. Quality of project implementation	MU	The quality of the implementation was affected by several factors stemming from the design and technical supervision, as well as the COVID-19 pandemic.
E2.1 Quality of project implementation by FAO (Budget Holder, Lead Technical Officer, Project Task Force, etc.)	MU	The identification of the project and its assessment as a priority and innovative initiative for Uruguay was appropriate. However, its technical supervision faced certain limitations. Areas for improvement were identified in the methodologies used to strengthen capacities and measure compliance with indicators, and in the monitoring and review of annual progress reports.
E2.1 Project oversight (project steering committee, project working group, etc.)	MU	The project steering committee addressed strategic issues such as the approval of workplans and other issues like communication and project visibility. However, no measures or decisions were taken to prevent possible non-compliance with results and outputs or to reduce the reported interinstitutional tension.

Appendix 2. The GEF evaluation criteria rating table

The GEF criteria/subcriteria	Rating	Summary comments
E3. Quality of project execution For directly implemented projects: FAO Project Management Unit/Budget Holder	MS	The PCU proposed adaptive measures (e.g. greater collaboration and work with academia and the private sector, as well as with government entities interested in the issue) during execution, which alleviated some institutional problems and delays generated by factors external to the PCU. However, due to the challenging situation, modifications had to be made to the results framework. This also generated long response times from institutions for essential project processes (e.g. hiring and a review of the terms of reference). The change of government also delayed some activities.
E4. Financial management and co-financing	MS	No areas for improvement were identified regarding financial management. In terms of co-financing, the goal was exceeded and only the official report is required at project closure to confirm the total amount.
E5. Project partnerships and stakeholder engagement	S	Working groups were formed to define and agree upon the execution of the activities, which effectively involved most of the stakeholders identified in the project document.
E6. Communications, knowledge management and knowledge products	MU	Valuable knowledge and materials were generated, which would have benefited from a targeted communications strategy.
E7. Overall quality of M&E	MU	The results framework contains some non-SMART indicators. In some cases, progress reports did not objectively reflect actual project performance. In addition, the results of the monitoring tool were not formally reported, which generated confusion about compliance with its indicators. The MTR showed various omissions and, in some cases, a lack of clarity in its conclusions.
E7.1 M&E design	MU	The M&E plan contains most of the requirements necessary to monitor a GEF-funded project. However, some indicators were not SMART.
E7.2 M&E implementation plan (including financial and human resources)	MU	The financial resources allocated during the design of this activity were appropriate. However, hiring a monitoring expert during execution would have helped to modify or improve the results framework indicators, develop a better monitoring tool, and ensure an objective report on the project's progress.
E8. Overall assessment of factors affecting performance	MU	Adequate financial management was carried out and important knowledge was generated for the promotion of the IPM and alternatives to pesticides. Successful stakeholder engagement processes were identified, and co-financing exceeded the expected goal. However, the lack of effective involvement on behalf of some counterparts negatively impacted execution and implementation. Areas of improvement were identified in terms of technical supervision, results framework indicators, progress reporting and institutional response times. There was no communications strategy.
<b>F. CROSS-CUTTING ISSUES</b>		
F1. Gender and other equity dimensions	MS	The project achieved significant participation of women. However, some proposed actions could not be implemented after the MTR due to the lack of progress of the project and its omissions.
F2. Environmental and social safeguards	MU	No actions have been included in the OSMP to safeguard the holders and the environment during the repackaging and transportation phase from the places of origin where the pesticide stocks are located to the temporary collection centres.
<b>Overall project rating</b>	MS	The project addresses a priority issue and is considered a catalyst to achieve a comprehensive approach to pesticide

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The GEF criteria/subcriteria	Rating	Summary comments
		<p>management in the country. Important advances were achieved, the amount of co-financing reported was higher than expected, and successful mechanisms were implemented for the involvement of the private sector and academia. However, a more elaborate strategy would have been necessary during the formulation of the project to achieve a common vision among its partners. This situation was reflected during the execution of the project, with some measures still pending completion or in need of strengthening (e.g. the quantities of obsolete pesticides to be eliminated). However, the necessary processes were started and enabling conditions were generated, such as agreements and capacity development for the management and disposal of pesticides. In this regard, the continuation and monitoring of these processes by the executing and co-financing partners is necessary for the sustainability of the results and to achieve the expected impact.</p>

*Note:* The rating for the evaluated criteria is the result of assessments carried out in the two phases of the evaluation.

## Appendix 3. Rating scheme

Note: For more information about the rating scheme, see Annex 2 Rating scales in the Guidelines for GEF Agencies in Conducting Terminal Evaluation for Full-sized Projects (GEF, 2017).

### PROJECT RESULTS AND OUTCOMES

Project outcomes are rated based on the extent to which project objectives were achieved. A six-point rating scale is used to assess the overall outcomes.

<b>Rating</b>	<b>Description</b>
Highly Satisfactory (HS)	<i>Level of outcomes achieved clearly exceeds expectations and/or there were no shortcomings.</i>
Satisfactory (S)	<i>Level of outcomes achieved was as expected and/or there were no or minor shortcomings.</i>
Moderately Satisfactory (MS)	<i>Level of outcomes achieved was more or less as expected and/or there were moderate shortcomings.</i>
Moderately Unsatisfactory (MU)	<i>Level of outcomes achieved was somewhat lower than expected and/or there were significant shortcomings.</i>
Unsatisfactory (U)	<i>Level of outcomes achieved was substantially lower than expected and/or there were major shortcomings.</i>
Highly Unsatisfactory (HU)	<i>Only a negligible level of outcomes were achieved and/or there were severe shortcomings.</i>
Unable to Assess (UA)	<i>The available information does not allow for an assessment of the level of outcome achievements.</i>

During project implementation, the results framework of some projects may have been modified. In cases where modifications in the project impact, outcomes and outputs have not scaled down their overall scope, the evaluator should assess outcome achievements based on the revised results framework. In instances where the scope of the project objectives and outcomes has been scaled down, the magnitude of and necessity for downscaling is taken into account. Despite the achievement of results as per the revised results framework, a lower outcome effectiveness rating may be given where appropriate.

### PROJECT IMPLEMENTATION AND EXECUTION

Quality of implementation and execution will be rated separately. Quality of implementation pertains to the role and responsibilities discharged by the GEF agencies that have direct access to the GEF resources. Quality of execution pertains to the roles and responsibilities discharged by the country or regional counterparts that received the GEF funds from the GEF agencies and executed the funded activities on the ground. The performance will be rated on a six-point scale.

<b>Rating</b>	<b>Description</b>
Highly Satisfactory (HS)	<i>There were no shortcomings and the quality of <b>implementation</b> or <b>execution</b> exceeded expectations.</i>
Satisfactory (S)	<i>There were no or minor shortcomings and the quality of <b>implementation</b> or <b>execution</b> meets expectations.</i>
Moderately Satisfactory (MS)	<i>There were some shortcomings and the quality of <b>implementation</b> or <b>execution</b> more or less meets expectations.</i>
Moderately Unsatisfactory (MU)	<i>There were significant shortcomings and the quality of <b>implementation</b> or <b>execution</b> was somewhat lower than expected.</i>
Unsatisfactory (U)	<i>There were major shortcomings and the quality of <b>implementation</b> or <b>execution</b> was substantially lower than expected.</i>
Highly Unsatisfactory (HU)	<i>There were severe shortcomings in the quality of <b>implementation</b> or <b>execution</b>.</i>
Unable to Assess (UA)	<i>The available information does not allow for an assessment of the quality of <b>implementation</b> or <b>execution</b>.</i>

## MONITORING AND EVALUATION

Quality of project M&E will be assessed in terms of:

- i. design
- ii. implementation .

## SUSTAINABILITY

*Sustainability will be assessed by taking into account the risks related to financial, sociopolitical, institutional and environmental sustainability of the project outcomes. The evaluator may also take other risks into account that may affect sustainability. The overall sustainability will be assessed using a four-point scale.*

<b>Rating</b>	<b>Description</b>
Likely (L)	<i>There is little or no risk to sustainability.</i>
Moderately Likely (ML)	<i>There are moderate risks to sustainability.</i>
Moderately Unlikely (MU)	<i>There are significant risks to sustainability.</i>
Unlikely (U)	<i>There are severe risks to sustainability.</i>
Unable to Assess (UA)	<i>Unable to assess the expected incidence and magnitude of risks to sustainability.</i>

## Appendix 4. The GEF co-financing table (with data as of June 2023)

Name of co-financing entity	Type of co-financing entity	Type of co-financing	Co-financing committed at the beginning of the project (USD)			Co-financing materialized to date (USD)		
			In-kind	Cash	Total	In-kind	Cash	Total
FAO	Implementing agency	In-kind	300 000		300 000	389500		389 500
Ministry of Environment	Local government	In-kind and cash	1 608 000	400 000	2 008 000	2 184 856	1 069 544	3 254 400
Ministry of Livestock, Agriculture and Fisheries	Local government	In-kind	1 080 000		1 080 000	1 592 000		1 592 000
Campo Limpio	Civil society organization	In-kind	2 620 000		2 620 000	4 720 000		4 720 000
State Sanitary Works	Local government	In-kind	1 250 000		1 250 000	0		0
Ministry of Public Health	Local government	In-kind	0		0	102 000		102 000
<b>Total</b>					<b>7 258 000</b>			<b>10 057 900</b>

Note: Data are updated with information reported in the PIR 2023 (period from 1 July 2022 to 30 June 2023).



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