
**Terminal Evaluation of the UN Environment Project:
“Implementation of National Biosafety Framework for Turkey”**



Evaluation Office of UN Environment

May 2018



Evaluation Office of UN Environment

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“Implementation of National Biosafety Framework for Turkey”
GEF ID: 4067
May/2018
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ACKNOWLEDGEMENTS

This terminal evaluation was prepared for the Evaluation Office of UN Environment by Emilia Venetsanou, Sociologist, International Expert in Human Rights Based Approach (HRBA) for Sustainable Development. The report benefits from a peer review conducted within Evaluation Office of UN Environment.

The Evaluation Office of UN Environment would like to thank the “Implementation of National Biosafety Framework for Turkey” project teams and in particular Alex Owusu – Biney (UN Environment Task Manager responsible for the Project) for their contribution and collaboration throughout the Evaluation process. Sincere appreciation is also expressed to the National Project Coordinator, Dr. Yusuf ARSLAN, to the project Assistant, Birgül GÜNER, to the Project Management Unit members that assisted the evaluation, Hilal YUCE ARSLAN and Serdar AYDEMİR, and to the Project Steering Committee members who took time to provide comments to the draft report, including former Chair of Biosafety Board, Prof. Dr. Hakan YARDIMCI (Ankara University). Appreciation goes also to Doç. Dr. Remziye YILMAZ and to Prof. Dr. Dürdane KOLANKAYA from Hacettepe University, to Doç. Dr. Füsün EYİDOĞAN from Baskent University, to Prof. Dr. Emine OLHAN and Prof. Dr. F. Füsün ERDEN from Ankara University, to Dr. Seval ÜNALAN and Engineer Fatih KAYA from Turkey Ministry of Food, Agriculture and Livestock, General Directorate of Food and Control.

The Evaluation Office of UN Environment would also like to thank the:
Republic of Turkey Ministry of Food, Agriculture and Livestock, General Directorate of Agricultural Research and Policies, General Director Dr. Nevzat BİRİŞİK;
Republic of Turkey Ministry of Food, Agriculture and Livestock, General Directorate of Food and Control, General Director Muharrem SELCUK
Ministry of Forestry and Water Affairs / General Directorate of Nature Protection and Natural Parks, Dr. Hüsnüye KILINÇARSLAN and Dr. Ergül TERZİOĞLU

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ABOUT THE EVALUATION

Joint Evaluation: No

Report Language(s): English

Evaluation Type: Terminal Project Evaluations

Brief Description: This report is a terminal evaluation of a UN Environment-GEF project implemented between 2013 and 2017. The project aimed at building capacity in Turkey for effective and full implementation of a National Biosafety Framework (NBF) in line with national development priorities, Cartagena Protocol and other international obligations. The evaluation sought to assess project performance (in terms of relevance, effectiveness and efficiency) and determine outcomes and impacts (actual and potential) stemming from the project, including their sustainability. The evaluation has two primary purposes. i.e. (i) to provide evidence of results to meet accountability requirements and (ii) to promote learning, feedback, and knowledge sharing through results and lessons learned among UN Environment, the GEF and their executing partner Ministry of Food, Agriculture and Livestock (MFAL) and other relevant agencies of the project participating countries.

Key words¹: Biosafety, Biosafety Framework, Genetically Modified Organisms, GMOs, Cartagena Protocol on Biosafety, CPB, Competent National Authority, Living Modified Organism, LMOs, Biosafety Clearing House, Risk Assessment, Risk Management, Evaluation, GEF, Turkey

¹ This data is used to aid the internet search of this report on the Evaluation Office of UN Environment Website –

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Project Identification Table

GEF Strategic Objective:	SP 6 – Biosafety/SO3	Focal Area(s):	Biosafety
GEF project ID:	4067	GEF OP#	(MTS 2010-2013) Governance EA(b): States increasingly implement their environmental obligations and achieve their environmental priority goals, targets and objectives through strengthened laws and institutions. (MTS 2014-2017) Environmental Governance EA2: The capacity of countries to develop and enforce laws and strengthen institutions to achieve internationally agreed environmental objectives and goals and comply with related obligations is enhanced.
UN Environment approval date:	20/08/2013	UN Environment Sub-programme:	Environmental Governance
GEF approval date:	25/01/2011	Project type:	Medium Size Project
Expected start date:	September 2011	Actual start date:	September 2013
Planned completion date:	August 2014	Actual completion date:	August 2017
Planned project budget at approval:	US\$ 1,292,650	Actual total expenditures reported as of August 2017:	US\$ 1,274,898 2
GEF grant allocation:	US\$ 542,650	GEF grant expenditures reported as of August 2017:	US\$ 524,898
Expected Medium-Size Project co-financing:-	US\$ 750,000	Secured Medium-Size Project co-financing:	US\$ 750,000
First disbursement:	October 2011	Date of financial closure:	Not yet closed
No. of revisions:	5	Date of last revision:	January 2017
No. of Steering Committee meetings:	Three	Date of last Steering Committee meeting:	14 December 2015
Mid-term Review/ Evaluation (planned date):	N/A	Mid-term Review/ Evaluation (actual date):	N/A
Terminal Evaluation (planned date):	2017	Terminal Evaluation (actual date):	November-December 2017
Coverage - Country(ies):	Turkey	Coverage - Region(s):	Europe and Asia

2 All funds accounted for, final expenditure to be finalised on release of 5% withholding

List of Acronyms and Abbreviations

ANUBIS	A New UNEP Biosafety Information System
BCH	Biosafety Clearing-House
CBD	Convention on Biological Diversity
CNA	Competent National Authority
CPB	Cartagena Protocol on Biosafety
GDAR	General Directorate of Agricultural Research
GE	Gender Equality
GEF	Global Environment Facility
GMO	Genetically Modified Organism
HRs	Human Rights
LMO	Living Modified Organism
MFAL	Ministry of Food, Agriculture and Livestock
MFWA	Ministry of Forestry and Water Affairs
NBF	National Biosafety Framework
NBSAP	National Biological Diversity Strategy and Action Plan
PIR	Project Implementation Review
PMU	Project Management Unit
TM	Task Manager (at UN Environment)
TOC	Theory of Change
ToR	Terms of Reference

Executive Summary

This is the final report of the Terminal Evaluation of the Project “Implementation of National Biosafety Framework for Turkey” (GFL/5060-2716-4E09), approved by UN Environment on 20/08/2013 for a duration of 36 months. A no-cost extension of 11 months was granted, shifting its official end date to 16/08/2017. The project was a Medium Size Project (MSP) financed through GEF-4 mechanism and belonged to GEF Biodiversity Focal Area. It was relevant to GEF Strategic Programme 6 (BD-SP6): Building Capacity for the Implementation of the Cartagena Protocol on Biosafety.

The Project was part of two UN Environment Medium-Term Strategies (2010-2013 and 2014-2017) and three Biennial PoWs (Programme of Work), i.e. 2012-2013, 2014-2015 and 2016-2017, Environmental Governance Sub-Programme. The total budget of the Project was 1,292,650 USD, the 42% of which represented the GEF allocation (USD 542,650) and the remaining 58% (USD 750,000) was the contribution of the Government of Turkey (of which, USD 550,000 in cash). By August 2017 (Official End), the Project had spent 524,897.82 USD (i.e. 96.7% of the GEF allocated budget) and the expected Government co-financing had been totally provided.

The Project was conceived as the Phase II of the UN Environment / GEF “Project on the Development of Biosafety Framework” (2002 – 2005). The expected Main Outcome of the Project was “A fully effective National Biosafety Framework in Turkey” (see Table 4 in Section 4.1), underpinned by four Direct Outcomes, i.e. a) Regulatory regime; b) Administrative system for handling applications, Risk Assessment and Risk Management; c) Monitoring and inspection system; d) Functional system for public awareness and participation. The National Executing Agency (NEA) of the Project was the Ministry of Food, Agriculture and Livestock (MFAL), which is also one of the two Competent National Authorities (CNA) for Biosafety in Turkey. The other CNA is the Ministry of Forestry and Water Affairs (MFWA), through its General Directorate of Nature Protection and Natural Parks. The NEA also insured the Project Management Unit (PMU). A nine-member National Steering Committee (NSC) ensured Project’s supervision.

The evaluation’s purpose was a) to provide evidence of results for accountability reasons, and b) to promote learning, feedback, and knowledge sharing among the UN Environment, the GEF, the National Executing Agency and the national partners. The evaluation analysed project related documentation and an inception report was prepared, which underwent a Peer Review at the UN Environment Evaluation Office and was shared with the Biosafety Task Manager at UN Environment. A country visit was prepared in strict collaboration with the Task Manager and the Project Management Unit (PMU) with which some evaluation tools were shared, and the field mission agenda was fine-tuned, as well as the list of stakeholders to be met. During the five-day country visit the Evaluation met relevant stakeholders and worked in close collaboration with the Project Management Unit (PMU).

Evaluation results are summarized below (see Table 7, Section 6.1, Conclusions). The Project as a whole rates Satisfactory.

Evaluation Criteria and Ratings Table³

Criterion	Rating	Sections in the Main Report
A. Strategic Relevance	HS	Section 5.1
1. Alignment to MTS and POW	HS	Section 5.1.1
2. Alignment to UNEP/GEF/Donor strategic priorities	HS	Section 5.1.2
3. Relevance to regional, sub-regional and national environmental priorities	HS	Section 5.1.3
4. Complementarity with existing interventions	HS	Section 5.1.4
B. Quality of Project Design	MS	Section 5.2
C. Nature of External Context	MF	Section 5.3.
D. Effectiveness⁴	MS	Section 5.4
1. Achievement of outputs	S	Section 5.4.1
2. Achievement of direct outcomes	MS	Section 5.4.2
3. Likelihood of impact	ML	Section 5.4.3
E. Financial Management	HS	Section 5.5
1. Completeness of project financial information	S	Section 5.5
2. Communication between finance and project management staff	HS	Section 5.5
3. Compliance with UNEP standards and procedures	HS	Section 5.5
F. Efficiency	S	Section 5.6
G. Monitoring and Reporting	MU	Section 5.7
1. Monitoring design and budgeting	MU	Section 5.7.1
2. Monitoring of project implementation	MU	Section 5.7.2
3. Project reporting	MS	Section 5.7.3
H. Sustainability	ML	Section 5.8
1. Socio-political sustainability	ML	Section 5.8.1
2. Financial sustainability	HL	Section 5.8.2
3. Institutional sustainability	HL	Section 5.8.3
I. Factors Affecting Performance	S	

3 HS = Highly Satisfactory; S = Satisfactory; MS = Moderately Satisfactory; MU = Moderately Unsatisfactory; U = Unsatisfactory; HU = Highly Unsatisfactory; HL = Highly Likely; L = Likely; ML = Moderately Likely; MU = Moderately Unlikely; U = Unlikely; HU = Highly Unlikely; HF = Highly Favourable; F = Favourable; MF = Moderately Favourable; MU = Moderately Unfavourable; U = Unfavourable; HU = Highly Unfavourable.

4 Where a project is rated, through the assessment of Project Design Quality template during the evaluation inception stage, as facing either an Unfavourable or Highly Unfavourable external operating context, the overall rating for Effectiveness may be increased at the discretion of the Evaluation Consultant and Evaluation Manager together.

Criterion	Rating	Sections in the Main Report
<i>1. Preparation and readiness</i>	S	
<i>2. Quality of project management and supervision</i>	S	
<i>3. Stakeholders participation and cooperation</i>	S	
<i>4. Responsiveness to human rights and gender equity</i>	U	Section 3.3, 5.2, 5.7, 5.8.1, 6.1, 6.3
<i>5. Country ownership and drivenness</i>	HS	
<i>6. Communication and public awareness</i>	MU	Section 5.4, 6.1, 6.3 (inter alia)
Overall project rating	S - Satisfactory	Section 6.1

The following conclusions, lessons and recommendations are discussed in detail in the final Chapter of the report (Chapter 6).

Conclusions

The Biosafety Law in Turkey prohibits any deliberate environmental release of LMOs. As a matter of fact, environmental release and LMOs production are the subject of a highly strategic debate evolving around social, political, ethical, environmental and vital economic considerations. Turkey and its commercial partners in the global food market are still considering which is the best option to foster, i.e. organic or genetically modified approach. However, the economically relevant poultry value chain requires huge quantities of feed which, to be accessed at competitive prices, has to be GMO.

Turkey has put in place all National Biosafety Framework (NBF) components, underpinned by a Biosafety Law (2010) and two Regulations (Regulatory regime / Project Direct Outcome 1) that define the Authorities, their mandate and the means for their functioning. The Competent National Authority (CNA) is institutionally and financially supported by the Ministry of Food, Agriculture and Livestock (MFAL) and ensures the Secretariat of the Biosafety Board, which, since its setting-up, is regularly deliberating, as the relevant number of decisions on GMO applications may prove. Besides the Biosafety Board, the Administrative system (Direct Outcome 2) is complemented by a List of Experts and two functioning Scientific Committees (one on risk assessment/management and one on socio-economic considerations). The Monitoring and Inspection System (Direct Outcome 3) relies on a functional network of 54 accredited laboratories (11 public and 43 private).

Although, in terms of Regulatory regime, Turkey registered consistent progress, several stakeholders consider the Biosafety Law to be strict and often interpreted by the judiciary in a very severe manner. Additionally, although people have been informed how the NBF system works, public trust is not there. These shortcomings may still challenge the smooth functioning of the NBF system.

As discussed in Section 4.3 (Likelihood of Impact), the delivery capacity of the Competent National Authority was gradually built and is progressively evolving to higher-level results, yet, as

extensively elaborated and underpinned by evidence, the Direct Outcomes were not fully achieved and Assumptions and Drivers for progress to Intermediate States hold partially. A National Action Plan to streamline national policy on Biosafety into government plans is not yet on the agenda and it is not clear if Biosafety will be encompassed into the next National Biodiversity Strategy and Action Plan (NBSAP) starting in 2018. Thus, at the end of this Project, it is Moderately Likely that the expected environmental Impact (Enhanced Conservation and Sustainable Use of Biological Diversity in Turkey) will be achieved.

In the context of full national ownership and leadership over the process of NBF building-up, the Project did play a catalytic role, triggering acceleration of the process and aggregating a relevant number of stakeholders around an array of activities, among others, awareness-raising / training sessions; training for laboratory people and customs officials; preparation and publication of guidelines and communication material.

The UN Environment network was highly instrumental to the exchange of experience and knowledge-building. However, Turkish achievements in encompassing socio-economic considerations in the decision-making process were not sufficiently explored, e.g. by promoting exchange with other countries and triggering a knowledge-building dynamic. The Project was Human Rights and Gender Equality blind. Stakeholders were not classified along the key feature of “Duty-bearers” and / or “Rights’-holders”, and local communities and possible vulnerable groups remained at the margins of the Project. The Project did not successfully address the gaps noted in public awareness and participation, which still represent the weakest pillar of the NBF. Progress registered on public awareness and participation (Direct Outcome 4) as well as on Monitoring and Inspection System (Direct Outcome 3) actually deserves further improvement and consolidation.

The evaluability of the Project was challenged by the absence of outcome indicators. Reporting and steering focused on Activities and Outputs rather than on Outcomes (structural / lasting change). Thus, the oversight of the Monitoring and Evaluation (M&E) system by UN Environment (Implementing Agency), presents an opportunity for further improvement.

Lessons learned

National ownership and leadership are major factors of performance (delivery of Outputs) for sustainable achievements. Robust national initiative, leadership and ownership, based on national capabilities and commitment to a clear agenda, may ensure high rates of delivery in the process of NBF building-up (set-up and strengthening), although the “replicability” of these key aspects may vary from context to context.

National stakeholders’ institutional memory may play a role as a major driving force, particularly in Projects addressing institutional building and human resources development. Projects may be catalytic in promoting and strengthening the institutional memory of national stakeholders.

Concrete people, women and men, make things happen. Projects may constitute for them a learning opportunity by providing the space for major exchange, for experimenting new paths and consolidating new skills, including soft skills.

Participatory approach and teamworking are instrumental to a learning-building evaluation. For a successful learning-oriented evaluation process, both appropriate tools and attitude are key factors. For critical thinking, some tools are more propitious than others. Tools have to be inter-complementary and used in an adaptive manner, helping participants to take distance from events in which they personally played a role. Attitude is much about soft skills that have to be instrumental to trust building.

Recommendations

The Competent National Authority should work on and invest resources to address Public awareness and Participation shortcomings, possibly through a broad and inclusive consultative process aiming at setting-up a “Biosafety Public Awareness and Participation Plan”, which would constitute a sustainable platform for building people’s trust towards the NBF as a functioning system that guarantees biodiversity and people’s health.

The UN Environment should work on the harmonization of the requirements at the design, implementation and evaluation stages. In particular, to ensure the consistency between the Project Document / ProDoc and the template for the “assessment of the Project Design Quality”.

The UN Environment should work on and invest resources to effectively and fully integrate Monitoring and Evaluation (M&E) requirements in the whole Project Cycle. More specifically; a) At the design stage (ex-ante), ensure the validation of the M&E system of each project; b) At implementation stage, promote capacity building (through workshops and coaching) on Project Cycle with focus on M&E, including soft skills; c) Ensure the Projects budget adequacy to the requirements of an effective monitoring and evaluation delivery, including capacity building.

The UN Environment should work on and invest resources, including appropriate Project budget, for effectively and fully mainstreaming Human Rights and Gender Equality (HR & GE) into the whole Project Cycle.

1 Introduction

1. This report refers to the Project “Implementation of National Biosafety Framework for Turkey” (GFL/5060-2716-4E09) that was approved by GEF the 25/01/2011 and by UN Environment the 20/08/2013 for a duration of 36 months. The total budget of the Project is 1,292,650 USD, the 42% of which represents the GEF allocation (USD 542,650) and the remaining 58% (USD 750,000) is the contribution of the Government of Turkey (of which, USD 550,000 in cash). The project was granted a no-cost extension of 11 months (including 6-month extension for administrative closure), shifting its Official End date to 16/08/2017.

2. The Project is considered the Phase II of the UN Environment / GEF “Project on the Development of Biosafety Frameworks”, implemented between 2002 and 2005, by the General Directorate of Agricultural Research. The National Executing Agency of the Project / NEA, at the time of its formulation, was the Ministry of Agriculture and Rural Affairs (MARA), currently Ministry of Food, Agriculture and Livestock / MFAL (through its General Directorate of Agricultural Research and Policies), which is also one of the two Competent National Authorities (CNA) for Biosafety in Turkey. The other Competent National Authority is the Ministry of Forestry and Water Affairs / MFWA (through its General Directorate of Nature Protection and Natural Parks).

3. The project is a Medium Size Project (MSP) financed through GEF-4 mechanism and belongs to GEF Biodiversity Focal Area. It is relevant to GEF Strategic Programme 6 (BD-SP6): Building Capacity for the Implementation of the Cartagena Protocol on Biosafety.

4. The Project makes part of two UN Environment Medium-Term Strategies (2010-2013 and 2014-2017) and three Biennial PoWs (Programme of Work), i.e. 2012-2013, 2014-2015 and 2016-2017, Sub-Programme Environmental Governance, as described in chapter 5.1.1.

2 Evaluation Methods

2.1 Overall approach of the Evaluation

5. “The terminal evaluation must provide a comprehensive and systematic account of the performance of a completed project by assessing its project design, process of implementation, and achievements vis-à-vis project objectives endorsed”⁵. In line with the UN Environment Evaluation Policy and Evaluation Manual and following the Guidelines for GEF Agencies on Conducting Terminal Evaluations, the evaluation had two primary purposes:

- (i) to provide evidence of results to meet accountability requirements, and
- (ii) to promote learning, feedback, and knowledge sharing through results and lessons learned among UN Environment, the GEF, the National Executing Agency and the national partners.

6. The report follows the format for Terminal Evaluations provided by the UN Environment Evaluation Office. According to the UN Environment evaluation methodology, in order to facilitate data analysis and “common language” between stakeholders, most criteria have been rated on a six-

⁵ Guidelines for GEF Agencies in Conducting Terminal Evaluations Evaluation Document No. 3, 2008

point scale⁶. Ratings are provided at the end of the assessment of each evaluation criterion (Chapter 5: Findings) and the complete ratings table is included under the Conclusions (chapter 6.1).

7. As requested by the UN Environment methodology, an Inception Report was produced at the beginning of the mission, containing a review of the project context, of the quality of project design, a draft reconstructed Theory of Change of the project, the evaluation framework and a tentative evaluation schedule. The Inception Report underwent a Peer Review at the UN Environment Evaluation Office and was shared with the Biosafety Task Manager at UN Environment.

8. In Turkey, the Competent National Authority (CNA) was also the National Executing Agency (NEA) for the Project, insuring, inter alia, the Project Management Unit (PMU). During the preparation of the field visit, the Consultant, with the support of the Biosafety Task Manager (TM) at UN Environment, contacted the National Executing Agency (NEA) to share some preliminary tools for systematising and discussing the main achievements of the Project (see following section 2.2) and started working with NEA on the field mission preparation, including the agenda and list of stakeholders to be met.

9. With the support of the National Executing Agency (NEA), that had prepared a well organised agenda, the Consultant held meetings with relevant national key-players, including the National Executing Agency (NEA) and Project Management Unit (PMU), five Ministerial Departments, three Universities, the Biosafety Board and Scientific Committees, as well as private sector representatives, for a total of 25 people (See below section 2.2 and Annex 3), and largely and openly discussed with them relevant strong and weak points regarding Project's implementation, performance and sustainability.

10. Consultations firstly aimed at pointing out stakeholders' perceptions of Project's major issues, with focus on the four "key strategic questions"⁷. Subsequently, consulted stakeholders were requested to provide evidence underpinning their perception on the basis of which the exercise could further unfold the analysis of their views. In fact, although National stakeholders keep record of relevant data, these are not always adequately systematized and perceived as evidence. Hence, the Consultant assisted stakeholders in identifying and systematizing some existing relevant data that could provide evidence of delivery capacity and / or achievements; e.g. the number of decisions taken from the Biosafety Board, samples tested in the labs or participation to training sections desegregated by gender.

11. To increase stakeholders' engagement and meaningful consultation, the Evaluation fostered a participatory approach. During the five days in Ankara, the mission continuously worked with the National Executing Agency (NEA) and built-up with the NEA and a number of relevant stakeholders, smooth, intense and fecund teamwork, much appreciated by all partners. Participatory approach and teamworking were highly instrumental to the learning dimension of the evaluation exercise. Lessons learned have been captured and further explored under section 6.2. The tools used to implement the participatory approach are described in the following section 2.2.

12. The Theory of Change (TOC) was instrumental to data analysis and verification. Outputs and outcomes were assessed against their quality and effectiveness, hence their capacity to drive and sustain changes at higher level of objectives. Quantitative and qualitative indicators were used. For capturing the level of ownership and participation of the different stakeholders involved, as well as for better understanding the reasons of successes or failures, the process / pathways of Project's achievements were assessed in the TOC.

⁶ Highly Satisfactory (HS); Satisfactory (S); Moderately Satisfactory (MS); Moderately Unsatisfactory (MU); Unsatisfactory (U); Highly Unsatisfactory (HU). Sustainability is rated from Highly Likely (HL) down to Highly Unlikely (HU).

⁷ to be addressed by the evaluation (see ToR and Conclusions in Chapter 6)

13. This was made possible by triangulating the desk information (reports, etc.) with the new information gathered during the country visit, such as observation and supplementary documentation in loco and personal interviews with stakeholders, particularly those who benefited from the training and capacity building activities. Review and analysis of data supplied by key stakeholders were also largely applied. Stakeholders were systematically requested to express their perception and, wherever possible, to support it by evidence.

14. The plurality of views was only partially captured because divergent views were only marginally represented among the stakeholders met during the visit in Ankara. This was a choice of NEA which had to be respected, complying with the National Sovereignty Principle and with the scope of the evaluation, focusing on assessing Project's effective implementation. As a matter of fact, the evaluation did foster an active hearing only of those stakeholders that the Project addressed as effective partners during its lifespan. As further elaborated under Section 3.3. (Stakeholders), not all potentially affected societal groups / stakeholders were encompassed by the Project; fact that somewhat reduced the possibility of data triangulation and narrowed the contribution of the evaluation, too, particularly on the component "public awareness and participation" (see more on that also under Section 5.6).

15. Less than five days' field visit proved to be inadequate for addressing all necessary meetings (that had to be shrunk down) and the volume of thorough work to be carried out with the main stakeholders (e.g. NEA and PMU but also the Biosafety Board, Scientific Committees and the Ministry of Forestry and Water Affairs (MFWA)). As a matter of fact, after the end of the field visit, the national partners continued, by own initiative, to carry on part of the analysis through a number of exercises that the Consultant did not manage to finalise during the country visit.

2.2 Methods and tools for data collection and analysis

16. Overall, the Terms of Reference (TOR) of the Evaluation and the methodological tools and formats provided by the UN Environment Evaluation Office proved to be a robust methodological framework for the Evaluation exercise, facilitating the systematisation and presentation of the evaluation findings. The implementation of the evaluation validated the ToRs' quality.

17. The Desk Review of all project documents and reports uploaded on the e-platform ANUBIS⁸ (an online information management system for UN Environment's Biosafety portfolio) was most helpful in gathering relevant information regarding the technical and financial performance of the Project.

18. The Inception phase of the Evaluation permitted a preliminary approach to the Project and the delivery of the Inception Report, which laid the foundation for the main report in some essential points, by including:

- a thorough Review of the Project Design Quality (PDQ) that highlighted strong and weak points of Project Design (see section 5.2), including project's design approach to stakeholders;
- the Stakeholders' analysis, identifying strengths and weaknesses of the approach and, on the other hand, outlining key-players' expected roles and responsibilities (as identified in the ProDoc) against which any possible progress on their "institutional capacity" could be assessed (see chapter 3.3);
- the construction of the Theory of Change / TOC of the project (see chapter 4); which provided the "red thread" and the core "interpretative guide" for the evaluation exercise;

8 ANUBIS stands for A New UNEP Biosafety Information System

- a “Revised Final Output Summary”, aiming at assessing Outputs’ Relevance and Effectiveness in the pathway to Outcomes and Impact.

19. Exchange with the Evaluation Manager of UN Environment Evaluation Office and with the UN Environment Task Manager was regular and most useful in clarifying methodological and technical issues regarding the evaluation process as well as the project implementation and general context.

20. Some tools prepared in advance by the Consultant were shared with the Project Team before the field mission. All of them were discussed with the Project Team and relevant stakeholders during the country visit. The tools include:

- the TOC with the diagrams 1 and 2 (Sections 4.2 and 4.3);
- the Revised Final Project Outputs Summary, based on the Final Project Output Summary (annexed to the Project Terminal Report) and integrated with the consultant’s questions and comments, aiming at triggering a critical analysis on Outputs’ Relevance and Effectiveness in the pathway to Outcomes and Impact (see Annex VI -1);
- the “Stakeholders’ Matrix” providing information in relation to each key stakeholder: 1- Interest and Power over Project implementation and results; 2- Institutional role and responsibilities / mandate in relation to biosafety, 3- Expected changes in its delivering capacity through the Project Implementation; and 4- Effective changes in its delivering capacity through project implementation. The exercise also aimed at validating the final list of relevant stakeholders. (see Annex VI -2)
- the Financial Tables (see Section 3.6 and Annex IV).

21. Some additional tools and exercises were arranged on the spot and used with the PMU, namely:

- progress registered over Strengths and Weaknesses. Based on the List of Strengths and Weaknesses elaborated during the inception meeting of the Project⁹, the exercise was aimed at assessing, using a six-point scale¹⁰, the progress registered by each Strength / Weakness, according to NEA/PMU perception and, at a second stage, to provide underpinning evidence over the progress registered. (see Annex VI -3). It is to be noticed that this exercise was completed by national stakeholders after the end of the field visit.
- overview and sample-based “validation” of ANUBIS reporting documents; namely financial reporting and auditing frequency and reporting.
- analysis of the Project monitoring system was analysed with the NEA/PMU through a “guiding review” of the reporting tools uploaded to ANUBIS. The PMU “guided” the Consultant to the reporting modalities and tools such as the work-plan and Project Implementation Review / PIR. (See more in chapter 5.7).

22. All proposed methodological tools were validated during the evaluation and proved useful by contributing to critical and analytical thinking as well as to evidence collection and triangulation of data. All of them leave room for further improvement, during successive evaluations, both in terms of content and in terms of modalities of implementation and use.

23. It was observed that, although communication channels with the NEA were established by the consultant, the evaluation tools sent in advance had not been used until the country-visit took place. Since the Evaluation took place after the Project had been closed, the availability of NEA’s

⁹ Inception meeting, Izmir, 23 - 24 December 2013

¹⁰ Highly Satisfactory = 6, Satisfactory = 5, Moderately Satisfactory = 4, Moderately Unsatisfactory = 3, Unsatisfactory = 2, Highly Unsatisfactory = 1.

public officers was limited due to the overload of their work agenda. Yet, the most important limitation consists in understanding the exercise and the relevance of the information requested. Once in the country, the reason for the evaluation requirements was understood, and the national partners were eager to experiment with new paths of thinking. For instance, the relevance of “evidence-based judgement” as well as the research of SMART indicators or the use of the six-point, scale turned out to be very popular. The exercises regarding Strengths and Weaknesses and the “Stakeholders’ Matrix” are tools that the PMU / NEA is eager to continue to use. The “Revised Final Project Outputs Summary” (see above) and particularly the TOC in particular, were too complex to be effectively handled. These two tools were useful in showing the level of complexity of the topic. The difficulty experienced by the project team to effectively work on the TOC and the causal pathways from Activities to Outputs and from them to Outcomes and Impact reflected gaps which were not addressed during the whole Project Cycle Management.

3 The Project

3.1 The Context

24. Turkey’s biological diversity is relevant, including both important genetic resources (the country is located at the intersection of the Mediterranean and Near Eastern gene centres, two key regions for the emergence of cereals and horticultural crops) and genetic centres of origin (5 micro-gene centres). Turkey is one of the richest countries in endemic plants: 34 % of the species in Turkey (3,150) are endemic.

25. Consequently, Turkish authorities take the view that the unregulated introduction of products of modern biotechnology could lead to loss of wild and agricultural biodiversity and that an operational biosafety framework is required to ensure that the potential benefits of modern biotechnology can be captured in a fully legal, safe and transparent manner. Based on the rationale that “the capacity is still not enough to protect genetic diversity against the adverse effects of LMOs”¹¹¹², the Biosafety Law prohibits any deliberate environmental release of LMOs. Environmental release and LMOs production is an open and highly strategic debate evolving along social, political, ethical, environmental and economic considerations. Taking the long view, in the global food market, Turkey and its commercial partners are still considering which is the best option to foster; i.e. organic agriculture or GMOs cultivation, as explained to the Evaluator by a high Official of the Turkish administration. At present moment, a pressing economic factor is the poultry value chain that requires huge quantities of imported feed, which, in the global market, is mainly represented by GMOs feed.

26. Turkey has been Party to the Convention on Biological Diversity (CBD) since 1998 and, since then, has taken part in the preparatory work for the Cartagena Protocol on Biosafety (CPB), which the country signed on May 24, 2000. With the aim of ensuring the protection of environment and biodiversity against the potential risks from Genetically Modified Organisms, CPB, the first international document of a binding nature in this regard, entered into force in the world on September 11, 2003 and in Turkey on January 24, 2004. The Ministry of Food, Agriculture and Livestock (MFAL), at the time Ministry of Agriculture and Rural Affairs (MARA), General Directorate of Agricultural Research and Policies (GDAR) has been appointed as national focal point for the Protocol.

27. Turkey benefited from the GEF / UN Environment “Project on the Development of Biosafety Frameworks”, Project Phase I, 2002 - 2005, whose most important output has been the “Draft Law

11 ProDoc § 4

12 LMO (Living Modified Organisms) and GMO (Genetically Modified Organisms) are considered synonymous and indifferently used in this Report.

on Biosafety". The Draft Law was developed through several meetings, workshops and surveys with the participation of 99 experts from 55 different agencies and institutions, including public agencies and institutions, universities, non-governmental organizations and trade bodies¹³. The "Law on Biosafety" No. 5977 as well as two Regulations entered into force in September 2010.

28. However, at the end of Phase I, Administrative and Institutional arrangements in line with the Draft Biosafety Law and the Protocol were still pending and human resources' capacity for effective implementation was inadequate. Infrastructure, such as food control laboratories able to detect LMOs, was not enough to manage both intentional and unintentional/illegal introduction of LMOs. Public awareness and information on LMOs, though substantially raised in Phase I, was still an important challenge. These were issues to be addressed in the subsequent Phase (Phase II).

29. Phase II Project, "Implementation of National Biosafety Framework for Turkey", under current evaluation, evolved from the following policy/strategy context:

- The Tenth Development Plan of Turkey (2014 and 2018), which envisages biotechnology as a forefront, rapidly-developing field, implying new possibilities as well as ethical and environmental challenges. The Plan suggests that high technology, specifically concerning genetically modified organisms, must comply with biosafety criteria.
- The Final Report on Agriculture and Food Panel, in the context of TUBITAK (Scientific and Technological Research Council of Turkey) Vision 2023 suggesting that "Genetic codes of some of the important plants, animals and microorganisms will be analysed, genetic transformation and reproductive/breeding technologies will be promoted to create improved plants, animals and microorganisms that would serve as the basic function of industrial products for specific needs."
- The "National Strategy and Action Plan on Biotechnology Research & Development (R&D) and Innovation¹⁴".
- The decisions taken at the 27th meeting of the Supreme Council for Science and Technology (SCST) (June 18, 2014) "Establishing, Developing and Supporting Research Infrastructures in the Field of Health and Biotechnology". The Ministry of Development, the Ministry of Food, Agriculture and Livestock, the Ministry of Health and TUBITAK (Scientific and Technological Research Council of Turkey) have been assigned as the responsible organizations.
- The National Biodiversity Strategy and Action Plan (NBSAP) / 2007 - 2017, where Biosafety was part of two objectives¹⁵ and included, as a target, delivery of the Biosafety Law. It is not yet possible to say whether biosafety will be included in the next NBSAP.

3.2 Objectives and components

30. The overall objective of the project is "the protection of biological diversity against possible adverse effects of LMOs by means of ensuring safe transfer, handling, use and transboundary movement of LMOs¹⁶".

13 Project, Phase II, Terminal Report, page 65 & 66.

14 Approved by the High Planning Council Resolution no. 2015/27 of 18/06/2015 and entered into force upon being issued in the Official Gazette no. 29399 of 27/06/2015

15 Objective 1.3 of NBSAP (to prevent or minimize as far as possible any pressures on and threats to biological diversity) and Objective 4.3 (to prevent or minimize as far as possible any pressures on and threats to agricultural biological diversity which come from the genetically modified organisms and the alien species).

16 ProDoc § 39

31. More specifically, to achieve the overall objective, the project “aims at building capacity in Turkey for effective and full implementation of a National Biosafety Framework (NBF) that is in line with national development priorities, Cartagena Protocol and other international obligations”. The Project comprises 5 Components, each of them with an Expected Outcome, as outlined in the following Table 1.

Table 1: Components and Outcomes of the Project¹⁷

Components	Outcomes
1. Stocktaking & Biosafety Policy	Stakeholder and gap analysis with regard to implementation of NBF of Turkey prepared
2. Regulatory Biosafety regime	2) Regulatory biosafety regime in place and legally mandated
3. System for handling of requests for authorization	3) Functional system for handling of requests, risk assessment, decision-making and risk management of LMOs established
4. Follow-up mechanisms	4) Monitoring and inspection system for LMOs established
5. Public awareness and participation	5) A functional system for public awareness and participation established for biosafety

3.3 Stakeholders

32. The Project Document (ProDoc)¹⁸ presents a descriptive analysis of the topic and provides a table listing eighteen (18) main stakeholders¹⁹ and their expected role, though, in relation to the Project, is of a fairly generic nature.

33. During the field mission, the following revised list, encompassing thirteen (13) stakeholders, has been provided, namely: Ministry of Food, Agriculture and Livestock (MFAL); Ministry of Forestry and Water Affairs; Ministry of Health; Ministry of Justice; Ministry of Economy; Ministry of Science, Industry and Technology; Ministry of Environment and Urbanization; The Scientific and Technological Research Council of Turkey; Ankara University; Middle East Technical University; Chamber of Food Engineers; Biotechnology Association; and Turkish Feed Manufacturer’s Association. Only very few stakeholders from Civil Society are represented.

34. Regarding possible vulnerable and marginalized groups, the ProDoc mentions the negative impact that uncontrolled introduction of GMOs may have over small farmers, nonetheless, the mentioning is of a generic nature. Potential vulnerable groups are not qualified or specifically mentioned / included in the identified Stakeholders group. Local communities are not explicitly encompassed as stakeholders. During the implementation, representatives of those groups were not considered. Human Rights and Gender data disaggregation was not taken on board. The Project remained blind to the fact that different interests may exist between and within groups. How the intervention may influence all the different stakeholders involved in, or possibly affected by the National Biosafety Framework (NBF) was not a question raised by the Project. Consequently, the steering of the Project was deprived of data triangulation based on the diversity of perceptions and interests. Although such an approach could have found more expression in the context of GMO environmental release, which has not been the case in Turkey so far, nevertheless, while building the

¹⁷ As defined in the Project Doc. and Project Logical Framework

¹⁸ Under Section 2 (point 2.5, “stakeholders’ mapping and analysis”) and Section 5 (“Stakeholders participation”, including a table identifying “Stakeholders” and “Roles of Stakeholders”)

¹⁹ On the basis of which one may identify six major groups, namely: a) Ministries and other Public bodies; b) Universities; c) NGOs acting either on environmental field or on consumers’ rights; d) Professional Chambers; e) Private sector and f) Public as the “final beneficiary of the project”.

NBF, it is important to set-up an appropriate conceptual and strategic approach that needs to be Human Rights and Gender sensitive.

35. The Project was gender blind, from the design to the implementation stage. Women were not specifically mentioned among stakeholders and no questions were raised about women representation in the different fora and project management arrangements. Moreover, the Project did not question men's and women's different roles, stakes and / or power over biosafety (e.g. through natural resources preservation, food security) as well as over the different impact of biosafety on these two categories. Data was not disaggregated by sex.

36. Nevertheless, data collected during the evaluation shows the important role of women in the Project's implementation. More than 36% of the participants registered in the workshops and training / awareness raising sections are female. Gender differentiation by sector of activity may be noticed. For instance, the female participation on Project activities related to Customs was below 20%, around 30% in the Law sector, whereas in GMOs laboratory female presence is as high as 70%. The "List of Experts" encompasses 113 women and 247 men. Three out of eleven members of the Risk Analysis (Risk Assessment and Risk Management) Committee are women, whereas in the Socio-Economic Committee women representation is clearly high (eight women and three men). Women are, however, virtually not represented in leading management and decision-making positions and bodies. The Biosafety Board is composed of nine male members, whereas in its Secretariat, the Vice-Chair position is ensured by a woman. The Project Steering Committee includes three women and six men, whereas the Project Management Unit was ensured by two men and three women, none of whom on top management position.

37. The mission had the opportunity to triangulate sufficient information regarding the "driving role" of the key-actor; i.e. the Ministry of Food Agriculture and Livestock (MFAL) through the General Direction of Research and Policies, which is also the National Executing Agency (NEA) and the General Direction of Food and Control.

38. The NEA is a depository of the relevant institutional memory following Phase I Project, related to the National Biosafety Framework development, a feature that was confirmed and strengthened during the implementation of the Project (Phase II). Moreover, the Final Evaluation noticed the presence of an institutional culture of cooperation, partnership and teamworking, at the level of the NEA as well as between the two Competent National Authorities (CNA), i.e. the Ministry of Food, Agriculture and Livestock (MFAL) and the Ministry of Forestry and Water Affairs (MFWA).

39. A relevant actor is the Biosafety Board which has a key statutory responsibility as per the law and is a direct beneficiary of the Project along with the Academics included in the List of Experts. Among the direct beneficiaries, it is of prevailing importance the Ministry of Forestry and Water Affairs (MFWA); which is also Focal Point of the Convention on Biological Diversity as well as Competent National Authority for Cartagena Protocol on Biosafety in coordination with the Ministry of Food, Agriculture and Livestock (MFAL) as explained above. The Private Sector, related to the poultry value chain, representing vital economic interests in Turkey, is also a relevant actor.

3.4 Project implementation structure and partners

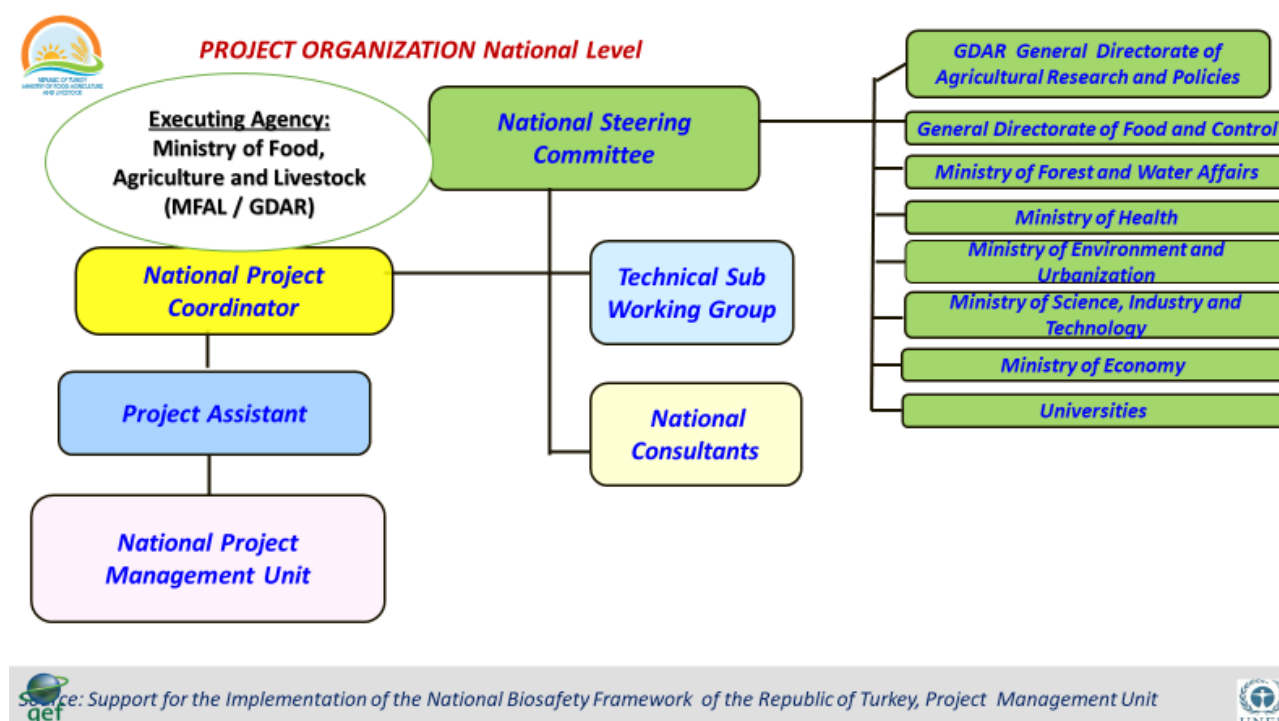
40. The Project's Implementing Agency was UN Environment (former UNEP). The National Executing Agency (NEA) of the Project was the Ministry of Food, Agriculture and Livestock (MFAL), former Ministry of Agriculture and Rural Affairs (MARA), through the General Directorate of

Agricultural Research and Policies (GDAR) which was also the National Executing Agency (NEA) of the previous project, Phase I, (National Biosafety Framework development, 2002 – 2005)²⁰.

41. The NEA provided a National Project Coordinator, supported by a Project Assistant and a National Project Management Unit (PMU). The project was also supervised by a National Steering Committee (NSC) composed by nine members, representative of core stakeholders and supported by a Technical Sub-Working Group and a number of National Consultants, as shown in Box 1, here below, provided by the PMU²¹.

42. Under Section 6, Monitoring and Evaluation Plan, the ProDoc mentions the UN Environment Task Manager (TM) and UN Environment Evaluation Office, with their specific responsibilities. No mention is made to the cross-cutting Environmental Governance Programme (probably at an early stage of setting, at the time of project drafting). The ProDoc supplies clear information regarding project monitoring, supervision and instruments of project governance.

Box 1 Project Organization at National Level



3.5 Changes in design during implementation

43. During its lifetime, the Project was granted 5 budget revisions, mainly for re-allocation of funds between budget lines. One, no-cost, extension of 11 months was granted, including the administrative closure of the project. The project ended in August 2017, instead of August 2016. No changes in Project Design can be registered.

3.6 Project financing

44. The Project Team did not follow and register Project expenditures according to the format of GEF budget (by component). Therefore, Table 2 can only present the Actual Total Cost not

²⁰ The MFAL / GDAR is also the National Focal Point for CPB and one of the two Competent National Authorities / CNA for the implementation of the Cartagena Protocol / CPB (the other CAN being the Ministry of Forestry and Water Affairs).

²¹ Project "Terminal Evaluation", 04-8 December 2017, Ankara/TURKEY; Birgül GÜNER, Project Assistant

disaggregated by Component / Activity. The issue is discussed in Section 5.7.2 (Monitoring implementation).

Table 2 *GEF Budget at design and expenditures by components (August 2017)*

Component/sub-component	Estimated cost at design (USD)	Actual Cost (USD)	Expenditure ratio (actual/planned)
1. Stocktaking and Biosafety Policy	5,000	na	
2. Regulatory biosafety regime	14,000	na	
3 System for handling of requests, risk assessment, decision-making and risk management of LMOs	128,000	na	
4. Monitoring and inspection system for LMOs	272,650	na	
5. Public awareness & participation for biosafety	53,000		
5. Project coordination, Monitoring and Evaluation	20,000	na	
Total	542,650	524,897.82	96,67%

Table 3 *Co-financing Table*

Co-financing (Type/Source)	UNEP own Financing (US\$1,000)		Government (US\$1,000)		Other* (US\$1,000)		Total (US\$1,000)		Total Disbursed (US\$1,000)
	Planned	Actual	Planned	Actual	Planned	Actual	Planned	Actual	
Grants			550	550			550	550	550
– Loans									
– Credits									
– Equity investments									
– In-kind support			200	200			200	200	200
– Other (*)									
Totals			750	750			750	750	750

4 Theory of Change

4.1 Overview

45. The reconstructed Theory of Change (TOC), based on the project's design and logical framework, aims at mapping the possible pathways of change between the projects outputs to the expected outcomes, up to the intended impact, as well as the main drivers and assumptions having a bearing on the envisaged change.

46. The formulation of the Project Objective in the ProDoc and its Logical Framework ("Effective and full implementation of National Biosafety Framework that is in line with national biosafety and development priorities, Cartagena Protocol and other international obligations") can be translated into the Main Project Outcome as follows: "A fully effective National Biosafety Framework in Turkey".

47. The Project Outcome (the fully effective NBF) is a key-instrument to fulfil the obligations of the Cartagena Protocol on Biosafety, eventually contributing to the Global Environmental Benefit (GEB) that represents the Intended Project Impact; i.e. the "Enhanced conservation and sustainable use of biological diversity in Turkey".

48. The reconstruction of the TOC of the Project has taken into account the following aspects:

- formulation of the Project Impact and of the Main Project Outcome defined here above;
- a conceptual framework of the National Biosafety Framework (NBF), which comprises:
 - a Government policy on biosafety;
 - a regulatory regime for biosafety;
 - a system to handle notifications or requests for authorisations;
 - systems for 'follow up' such as enforcement and monitoring for environmental effects;
 - mechanisms for public awareness, education and participation.
- the four main Components of the Project and correspondent Outcomes, as formulated in the ProDoc (reported in Table 4 here below).

Table 4 Comparison of Results

Results as stated in the ProDoc Logframe	Results as stated in the TOC at Evaluation
	Impact
	Enhanced Conservation and Sustainable Use of Biological Diversity in Turkey
Overall Goal (in the ProDoc)	Intermediate States to Impact
The overall objective of the project is protection of biological diversity against possible adverse effects of LMOs by means of ensuring safe transfer, handling, use and transboundary movement of LMOs ²² .	(IS 3) Protection of biological diversity against possible adverse effects of LMOs by means of ensuring safe transfer, handling, use and transboundary movement of LMOs, in compliance with Art. 1 of Cartagena Protocol (CPB)
	(IS 2) Improved governance of national / regional biosafety systems based upon: Rule of law and compliance, Accountability and Liability, Equity, Transparency, Citizens' Participation
	(IS 1) Improved Decision-making, Effective mechanisms, Enhanced quality information and transparency
Overall objective of the project²³ (in the ProDoc)	Main Project Outcome
The project aims on building capacity in Turkey for effective and full implementation of National Biosafety Framework (NBF) that is in line with national development priorities, Cartagena Protocol and other international obligations	A fully effective National Biosafety Framework in Turkey
Outcomes (in the Logframe)	Direct Outcomes
Stakeholder and gap analysis with regard to implementation of NBF of Turkey prepared	
Regulatory regime in place and legally mandated	Regulatory regime in place and legally mandated
Functional system for handling of requests, risk assessment, decision-making and risk management of LMOs established	Administrative system for handling applications, Risk Assessment and Risk Management
Monitoring and inspection system for LMOs established	Monitoring and inspection system for LMOs established

²² Appendix 4, Project Results Framework and ProDoc, §39, in the ProDoc, called "National Biosafety Committee"

²³ Appendix 4, Project Results Framework and ProDoc, §39

Results as stated in the ProDoc Logframe	Results as stated in the TOC at Evaluation
Functional system for public awareness and participation established for biosafety	Functional system for public awareness and participation
Outputs	Outputs
Stocktaking report that analyses the current status of modern biotechnology and biosafety system	1) A baseline established (Stocktaking Report) on current status of modern biotechnology and biosafety system
Regulations under Biosafety Law approved Biosafety Body ²⁴ established Competent authorities (CA) and Scientific Committees ²⁵ mandated Manual on application procedure under the Law prepared Training for lawyers undertaken on legal aspects of transboundary movements of LMOs and products thereof and other aspects about use of LMOs	2) Regulations of Biosafety Law approved 3) Biosafety Body established 4) Competent authorities (CA) and Scientific Committees mandated 5) Manual on application procedure under the Law prepared 6) Lawyers trained on legal aspects of transboundary movements of LMOs
Human resources for handling of requests, risk assessment, decision-making and risk management of LMOs improved Guidelines, methodologies and manuals on risk assessment and risk management prepared Internet portal, which is accessible by risk assessors, decision-makers and risk managers, prepared and functional for data collection, input and analysis for risk management and risk communication purposes Criteria to consider possible socio-economical impacts determined and prioritized to be taken into consideration in the process of decision making	7) Staff / members of CNA, Biosafety Body, Scientific Committees, 11 national trainers and staff of 8 Regional Research Inst. trained for handling requests, RA, RM and decision-making 8) Three Guidelines, methodologies and manuals on RA and RM prepared and one on Biosafety Law 9) Internet portal accessible by risk assessors and decision-makers for data collection, inputs and analysis 10) Criteria for socio-economic impacts determined and prioritized
Laboratories and research institutes mandated and strengthened for monitoring and inspection Ankara Control Laboratory accredited for detections of LMOs and detection methods standardized to be used in mandated laboratories Human resources for monitoring, inspections, border controls, emergency response and compliance to Biosafety Law and the Protocol improved Guidelines, methodologies and manuals on monitoring, inspections and emergency response prepared Registration system with unique identifiers to trace back LMOs established	11) 5 Laboratories and 3 research institutes mandated and strengthened for monitoring and inspection 12) Ankara Control Laboratory accredited as nat. reference lab. 13) Human resources improved for monitoring, inspections, border controls, emergency response and overall compliance 14) Guidelines, methodologies and manuals on monitoring, inspections and emergency response prepared (see also point 8 above) / Prepared "Guidelines on Control and Traceability of Genetically Modified Organisms and Products" 15) Registration system established with unique identifiers (OECD, EU) to trace back LMOs
Public awareness action plan of NBF updated Raise the public awareness through workshops, publications and trainings National BCH strengthened	16) Public awareness action plan of NBF updated 17) Public awareness increased through workshops, publications (two brochures) and trainings (three meetings, total 65 participants; Two panels, total 170 participants; one festival with 50 participants; TAGEM Program Evaluation Meeting, 22 February 2016, Antalya, 586 participants) 18) National BCH strengthened

²⁴ In the ProDoc referred as National Biosafety Committee (NBC)

²⁵ In the ProDoc referred as Scientific Advisory Committee (SAC)

4.2 The causal logic from Outputs to Outcome

49. Diagram 1 maps out the lower part of the reconstructed Theory of Change (from Outputs to Direct Outcomes) based on the causal logic of the project from the project documents. Project's activities are usually designed to deliver certain Outputs²⁶, which in turn aim to make a significant contribution to the achievement of the main project Outcome²⁷, i.e. "A fully effective NBF in Turkey". The reconstruction of the TOC was quite straightforward, since Project's Outputs and Outcomes were coherently grouped in the Logical Framework.

50. The Outputs are grouped in five clusters, being the first one represented by a preliminary Output to be delivered in the inception phase of the Project (baseline assessment). The other four clusters are organized to match four components of the NBF. Each output cluster is leading to a Direct Outcome that represents the suitable change to be achieved in a specific component of the NBF. It has to be noticed that one of the components of the Framework (Policy on Biosafety) was not contemplated in the ProDoc and in the Logical Framework. The issue was not explored in the ProDoc. As confirmed by the findings, "there is no separate policy document as such, the Biosafety Law gives the basic principles of the Biosafety Policy"²⁸.

51. In the TOC proposed, a number of Drivers are considered, specific to each level of results. For the delivery of all Project's Outputs, the "institutional memory" of the National Executing Agency, relying on the experience gained during the previous Project "Development of the NBF" (2002-2005)", is considered a key Driver for the current Project, Phase II. Moving from the Outputs level to the Direct Outcomes, additional relevant Drivers are identified; namely:

- a. the existence of the Nat. Biosafety Framework NBF (prepared in 2005; Law approved in 2010);
- b. the coordination role of the two CNAs (Ministry of Food, Agriculture and Livestock, and Ministry of Forest and Water Affairs),
- c. the functional and harmonious coordination between the two CNAs;
- d. the existence of clear Regulations and Guidelines;
- e. The identification of appropriate participatory methods that are effectively implemented all along the decision-making process.

52. Two relevant Assumptions are identified; namely:

- a. The Biosafety Board is able to play its decision-making role.
- b. Human resources trained by the Project are retained after its end and are fully operational.

4.3 The pathway from Outcome to Impact

53. The intended impact of the project is the Global Environmental Benefit (GEB) to which it contributes; i.e. the enhanced conservation and sustainable use of biological diversity in Turkey. The pathway from the Main Project Outcome to the intended Impact is not straightforward; transitional conditions called Intermediate States (IS) have to be fulfilled, as shown in Diagram 2 below.

54. Three main Intermediate States (I.S.) have been identified. The first I.S 1 "Improved decision-making processes for LMOs approval, effective implementation mechanisms and enhanced quality

26 Outputs : the goods and services that the project must deliver in order to achieve the project outcomes ("the ROTI Handbook", GEF, 2009)

27 Outcomes: the short to medium term behavioural or systemic effects that the project makes a contribution towards, and that are designed to help achieve the project's impacts ("the ROTI Handbook", GEF, 2009)

28 Source: "GEF Tracking Tool" (app. 15 of the ProDoc), the Biosafety Law and interviews with relevant stakeholders.

information and transparency” is achievable under the assumptions that the NBF has the financial resources to be fully operational. Key drivers at that step are the coordinating role of the Competent National Authority (CNA), effective GMOs management systems in place (e.g. for detection and referral, for handling applications, for risk assessment and monitoring), the active stakeholders’ and public participation, quality information available and timely flowing into BCH and national websites. Possible weaknesses in these driving forces may jeopardise or delay the achievement of I.S.1.

55. Improved decision-making may lead to “Improved Governance of National/International Biosafety systems based upon: Rule of Law and Compliance, Accountability and Liability, Equity, Transparency and Citizens’ Participation” (I.S. 2), under the assumption that the political will is not coming short missing. That should be reflected in the development of a National Action Plan to streamline national policy on Biosafety into national strategies and plans. The main drivers at that stage will be effective platforms for stakeholders’ participation (in planning, decision making and funding), conducive to open and transparent information flows and negotiation processes at different levels.

56. The Intermediate State 3 (I.S. 3) corresponds to Project’s “Overall Objective”²⁹ (see Table 4) and refers to the Objective of the Protocol itself, as stated in its art. 1³⁰. Political will and negotiation / partnerships development, also at regional and international levels, will still represent a strong assumption, while the driving force is the capacity of the CNA to provide oversight to the NBF, ensuring effective decision-making mechanisms based on rigorous Risk Assessment and Risk Management best practices. Under these conditions (assumptions and drivers), the Project Impact (Enhanced Conservation and Sustainable Use of Biological Diversity in Turkey) could be achieved.

29 “Protection of biological diversity against possible adverse effects of LMOs by means of ensuring safe transfer, handling, use and transboundary movement of LMOs.”, according to the Prodoc constitutes the overall objective of the project and is in compliance with art. 1 of Cartagena Protocol (CPB).

30 “In accordance with the precautionary approach contained in Principle 15 of the Rio Declaration on Environment and Development, the objective of this Protocol is to contribute to ensuring an adequate level of protection in the field of the safe transfer, handling and use of living modified organisms resulting from modern biotechnology that may have adverse effects on the conservation and sustainable use of biological diversity, taking also into account risks to human health, and specifically focusing on transboundary movements”.

Diagram 1. Reconstructed TOC from Project Outputs to Outcome

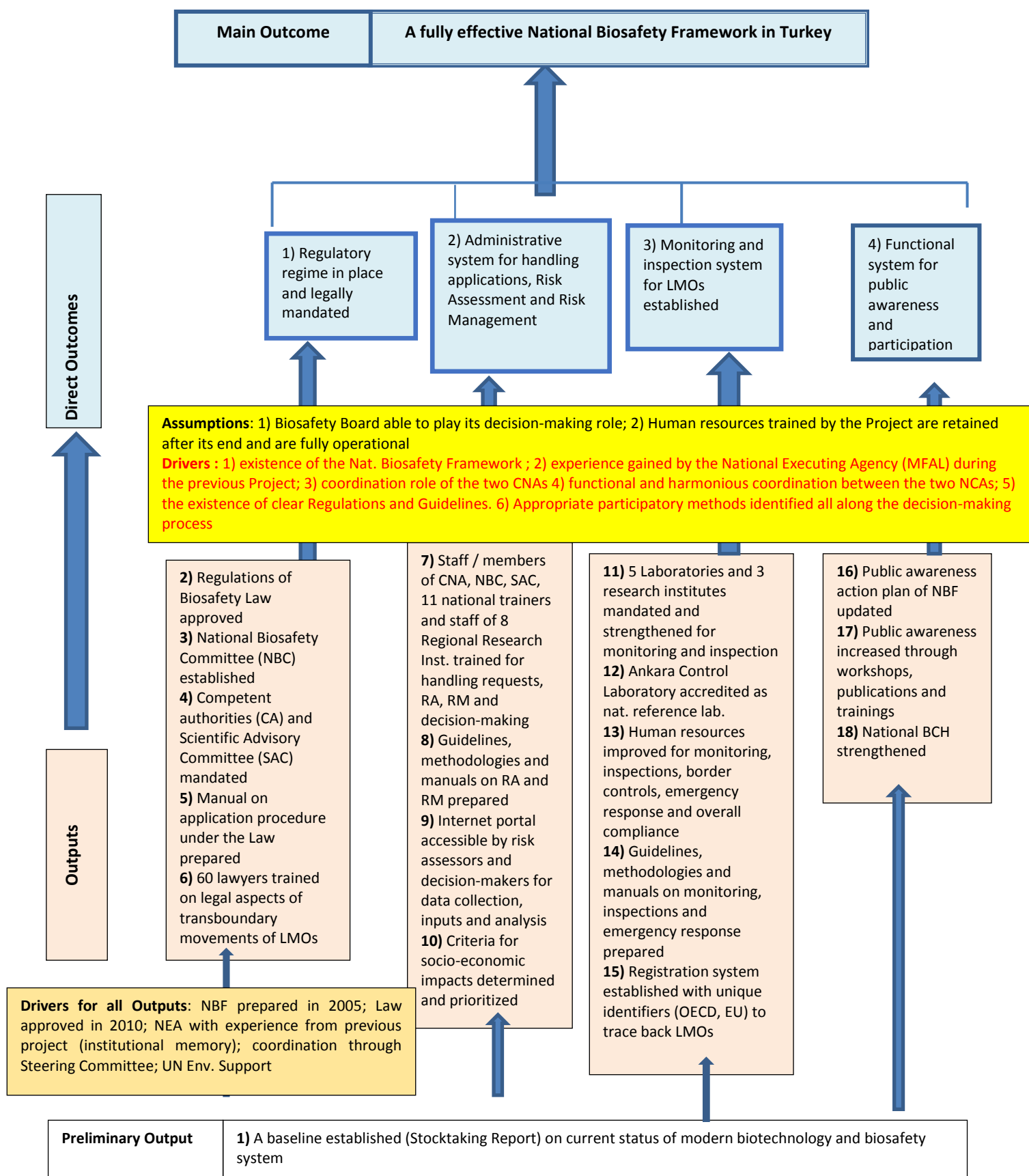
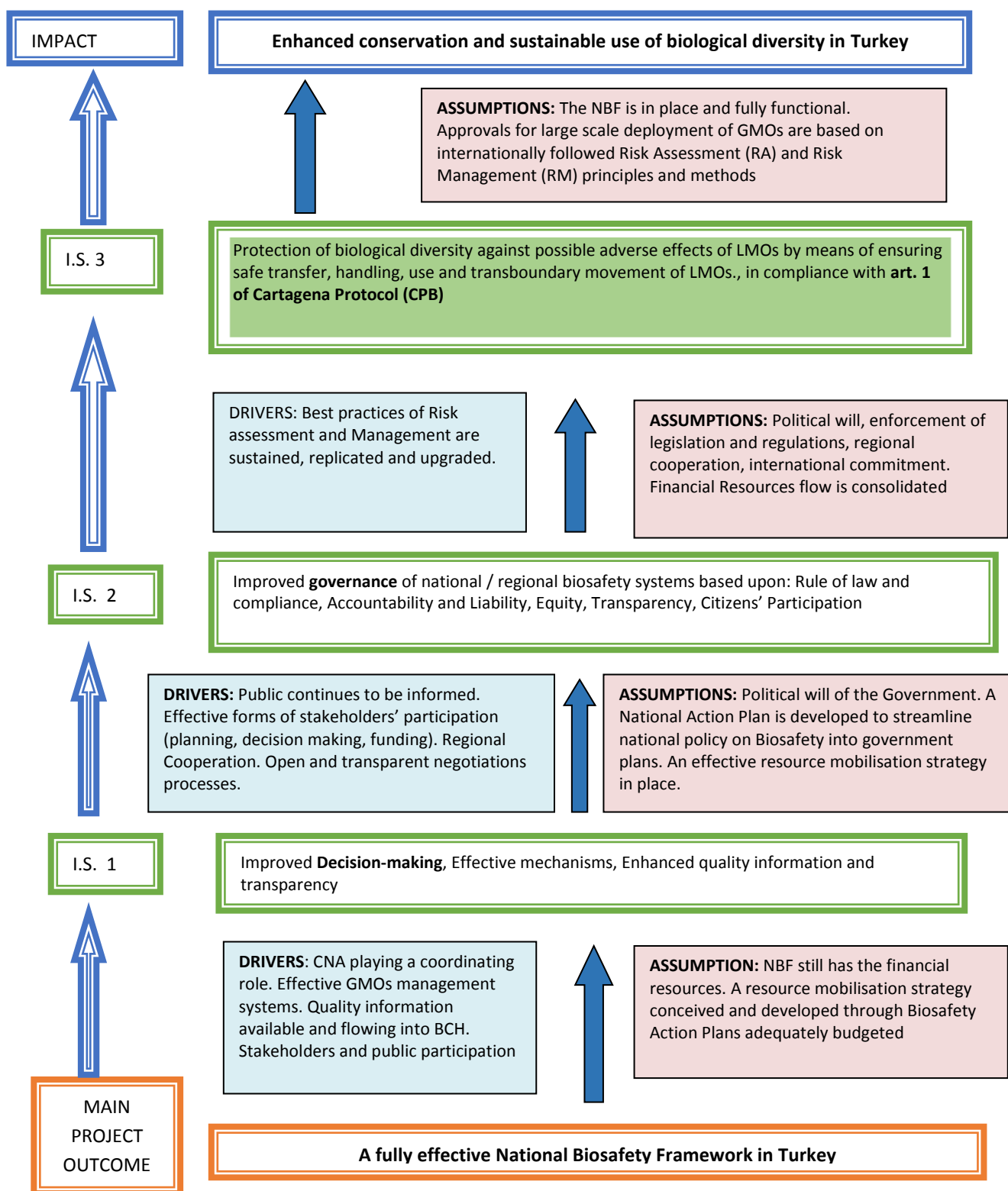


Diagram 2. Reconstructed TOC from Project Outcome to Impact



5 Evaluation Findings

57. Complying with the UN Environment Evaluation Office requirements and guidelines, in this chapter, the Evaluation findings are exposed, discussed and consequently rated against a set of criteria³¹. Rating uses a six-point scale; i.e. Highly Satisfactory (6), Satisfactory (5), Moderately Satisfactory (4), Moderately Unsatisfactory (3), Unsatisfactory (2), Highly Unsatisfactory (1).

5.1 Strategic Relevance

5.1.1 Alignment to the UN Environment Medium Term Strategy (MTS) and Programme of Work (POW)

58. The Project crosses over two UN Environment Medium-Term Strategy periods (2010-2013 and 2014-2017) and three Biennial Programmes of Work i.e. 2012-2013, 2014-2015 and 2016-2017 of the Sub-Programme Environmental Governance. Table 5 below provides a summarised outline of the contribution of the Project to the Expected Accomplishment (EA) of the Sub-programme Environmental Governance in the two Medium-term Strategies.

Table 5 Contribution of the Project to the Medium-Term Strategy (MTS)

Expected Accomplishment (EA)	Contribution of the Project
MTS 2010-2013 , Sub-programme Environmental Governance, EA(b) : States increasingly implement their environmental obligations and achieve their environmental priority goals, targets and objectives through strengthened laws and institutions	<ul style="list-style-type: none"> • Overall support to the implementation of the NBF • Biosafety Law and Regulations, Guidelines • Establishment of the Biosafety Board and two Scientific Committees
MTS 2014-2017 , Sub-programme Environmental Governance, EA2 : The capacity of countries to develop and enforce laws and strengthen institutions to achieve internationally agreed environmental objectives and goals and comply with related obligations is enhanced;	<ul style="list-style-type: none"> • Overall support to the implementation of the NBF • Biosafety Law and Regulations, Guidelines • Establishment of the Biosafety Body and two Scientific Committees • Capacity Building in Risk Assessment and Management • Public Awareness and Information • National website (BCHMT / Biosafety Clearing-House Mechanism of Turkey) linked to BCH

5.1.2 Alignment to UN Environment /GEF Strategic Priorities

59. The project is a Medium Size Project (MSP) financed through GEF-4 mechanism and belongs to GEF Biodiversity Focal Area. It is relevant to GEF Strategic Programme 6 (BD-SP6): Building Capacity for the Implementation of the Cartagena Protocol on Biosafety. Given its focus on Capacity Building, the Project is aligned with Bali Strategic Plan (BSP). The project has been active in addressing many of the cross-cutting issues listed in Section D of the Plan, such as the Strengthening of national institutions, the Development of national law and regulations and the Compliance with obligations under multilateral environmental agreements. The Project was gender blind in its formulation.

³¹ Guidelines from the Evaluation Office to the Consultants, "Criterion Rating Description", Updated November 2017, still in progress.

5.1.3 Relevance to Regional, Sub-regional and National Environmental Priorities

60. The Project fostered a regional and sub-regional approach to Biosafety by supporting the participation of Turkish officers and experts to several activities within the Central / Eastern Europe Region. We can mention the Course on “LMO Impact Assessment” (Moldova, 2014) and the Workshop on “Enforcement of Biosafety Regulations” (Prague, 2015). Judges from the Regional Administrative Court have also been engaged. The annual meeting of the teams of the Biosafety UN Environment / GEF Projects at regional level was also instrumental to enhance the regional dimension.

5.1.4 Complementarity with Existing Interventions

61. As described in Section 3.1 (Context), the Project was conceived to complement the previous GEF/UN Environment Project “Development of the NBF” (2002-2005) and was, in fact, considered as the Phase II of that Project. The Project builds upon and consolidates the achievements and the institutional network developed in the context of the previous project.

62. The National Biosafety Framework has progressively been built through the contribution of several government ministries, universities, research institutions, regulatory agencies, and to a minor extent, the involvement of the private sector and some NGOs (see Section 3.3). It is also consistent with and relevant to a number of National priorities and plans, as discussed under Section 3.1, Context. The Project surely supported the national efforts for protecting country’s biodiversity and genetic resources and was well aligned with national priorities in those areas.

63. As a whole, the strategic Relevance of the Project can be rated as **HS (Highly Satisfactory)**.

5.2 Quality of Project Design

64. The Review of the Project Design Quality (PDQ) was done in the Inception Report of the Evaluation on the basis of the Project Document (ProDoc) and its Appendices, particularly Appendix 1 (Budget), Appendix 4 (Results Framework), Appendix 5 (Workplan and timetable), Appendix 6 (Key deliverables and benchmarks), Appendix 7 (Costed M&E plan) and Appendix 15 (Tracking tools). The Review was carried out using the “Template for the assessment of the Project Design Quality (PDQ)”, prepared by UN Environment Evaluation Office, which contemplates a rating system based on a six-point scale: Highly Satisfactory (6), Satisfactory (5), Moderately Satisfactory (4), Moderately Unsatisfactory (3), Unsatisfactory (2), Highly Unsatisfactory (1), also in use for the main evaluation.

65. Overall, the project design is remarkably clear, accurately unfolding along the main key components / building blocks of the National Biosafety Framework and well rooted in the logical pathway expressed in the Logical Framework. Overall, the Outcomes and the Outputs of each component are clearly formulated, most of the Outputs indicators are SMART and the means of verification are coherently defined.

66. As discussed more in depth in Section 5.7 (Monitoring and reporting) Outcomes indicators, however, are not defined. The component “Public awareness and participation” is less satisfactorily developed; its Outputs are quite vague and the overall strategy and entry points for public participation are not clearly spelled out. Although sub-chapter 3.10 of the ProDoc explains the relevance of the topic and makes the case by referring to NBF Project Phase I, this is not well reflected in the Appendix 4: Project Results Framework. Stakeholders analysis and partnerships aspects are too generically described. Specific challenges and risks regarding Biosafety institutional framework are not sufficiently discussed.

67. Sustainability is poorly treated as a whole and, in fact, scores “Unsatisfactory” in the Project Design Quality Assessment. The Project document does not succeed in providing objective and clear elements of analysis regarding the development of Biosafety agenda after the end of the Project. Some relevant issues are not adequately treated, such as the financial viability of the framework, future institutional challenges and solutions, participation and inclusion in decision-making, as well as the influence of the overall socio-political context in the sustainability of Biosafety agenda in the country.

68. Whereas human rights-based approach to sustainable development is important under the “Template for the assessment of the Project Design Quality (PDQ)”, in the ProDoc the approach is absent, rating “Moderately Satisfactory”. (See also in Chapter 3.3 / Stakeholders).

69. As a whole, the Project Design scores well or very well in most of the criteria, yet some low scores in relevant chapters (e.g. Sustainability) lower the total score. In fact, the average for the whole of the Project Design is 3,7 and falls under the category “**Moderately Satisfactory**”.

5.3 Nature of the External Context

70. External context as climatic events, infrastructures, security, economic and political stability may challenge Projects’ implementation. Although the Evaluation deems that the external context of the current Project did not affect Project’s implementation, during the its lifespan adverse events manifested, mostly related to the geopolitical situation in the broader region. Therefore, the External Context is considered **Moderately Favourable**.

5.4 Effectiveness

5.4.1 Delivery of Outputs

Output 1 Stocktaking Report

71. A Stocktaking Report was prepared and discussed in an Inception Meeting with 38 participants to assess the baseline situation of modern biotechnology and biosafety system in Turkey. The analysis included critical shortcomings and requirements for a fully operational biosafety system, analysis of stakeholders, analysis of technical, financial, institutional and social barriers, as well as capacity and development needs.

Outputs **2)** Regulations of Biosafety Law approved; **3)** Biosafety Body established; **4)** Competent Authorities (CA) and Scientific Committees mandated; **5)** Manual on application procedure under the Law prepared; **6)** Lawyers trained on legal aspects of transboundary movements of LMOs related to Direct Outcome 1) Regulatory regime in place and legally mandated

72. All above Outputs were delivered. The “Biosafety Law” was published in 2010; i.e. before the approval of the Project. The “Regulation on Genetically Modified Organisms and Products” and the “Regulation Connected with Working Procedure and Principles of Biosafety Board and Committees” were published in the Official Gazette in 2010, as well. The “Biosafety Board” and the “Scientific Committees” (one on risk assessment/management and one on socio-economic considerations) were established and legally endorsed by the above referred Law and Regulations; which also provide the legal basis for the Competent Authority, namely the Ministry of Food, Agriculture and Livestock. A “Guide on Application Procedures” has been completed. A two-day workshop on

Biosafety Law and Implementation, held by the General Directorate of Agricultural Research (GDAR) and the Turkey Justice Academy, was attended by 134 lawyers and legal officers (against a mid-term target of 60).

Outputs **7)** Staff / members of CNA, Biosafety Body, Scientific Committees, 11 national trainers and staff of 8 Regional Research Inst. trained for handling requests, RA, RM and decision-making; **8)** Guidelines, methodologies and manuals on RA and RM prepared; **9)** Internet portal accessible by risk assessors and decision-makers for data collection, inputs and analysis; **10)** Criteria for socio-economic impacts determined and prioritized related to Direct Outcome 2) Administrative system for handling applications, Risk Assessment and Risk Management

73. All Outputs related to Outcome 2 were delivered as planned and, in a number of cases, targets were exceeded, at least in quantitative terms. However, as discussed in the following Section 5.4.2, qualitative elements of analysis and evidence of performance are limited also because the Assessment and Follow-up component of the trainings was weak.

74. Technical “Guidelines for the Risk Assessment of Genetically Engineering Crops and Derived Food and Feed”, as well as for “Socio-economic Evaluation Criteria in Decision-Making Process for GMO and GMO Products” were delivered. The internet portal, which was developed and is functional (see Output 18) is accessible by experts and decision-makers for collecting data and information.

Outputs **11)** Five Laboratories and 3 research institutes mandated and strengthened for monitoring and inspection; **12)** Ankara Control Laboratory accredited as nat. reference lab. ; **13)** Human resources improved for monitoring, inspections, border controls, emergency response and overall compliance; **14)** Guidelines, methodologies and manuals on monitoring, inspections and emergency response prepared; and **15)** Registration system established with unique identifiers (OECD, EU) to trace back LMOs, in relation to Direct Outcome 3) Monitoring and inspection system for LMOs established

75. All Outputs related to Outcome 3 were delivered and in some cases, targets were largely exceeded as in the case of the 54 laboratories performing GMO analyses³². Public servants (a total number of 285 from 81 Provinces) related to monitoring, inspections and borders control received an average of 2-3 days training. As already mentioned above, however, qualitative elements of analysis and evidence of training performance are limited. A compilation of six guidelines on monitoring and inspection was delivered and the Registration System was also established by the Biosafety Board, as planned.

Outputs **16)** Public awareness action plan of NBF updated; **17)** Public awareness increased through workshops, publications and trainings; **18)** National BCH strengthened, in relation to Direct Outcome 4) Functional system for public awareness and participation

32 There are 11 Public Food Control laboratories under the Min. of Agriculture (MFAL) along with 43 Private Food Control laboratories, (all of them accredited by the national accreditation body). Complete GMOs detecting and quantification tests are performed by 6 Public and 25 Private Food Control Laboratories The number of GMO analyses was 1102 in 2013 and raised to 1.362 in 2017.

76. The Outputs related to Public Awareness and Participation were partially delivered. The Public Awareness Plan was reviewed but still remains an administrative tool that has not fully evolved in an Action Plan and is not functionally anchored to a National Strategy. Concerning workshops, although a list of activities was performed, it is difficult to assess outputs delivery against targets, since they were not clearly expressed in the ProDoc.

77. The Biosafety Information Exchange Mechanism of Turkey (BIEMT), which is the National Biosafety Clearing-House (BCH) is legally mandated by Biosafety Law³³ and was updated and upgraded but, to the perception of many, further improvements are still needed.

78. Eventually, delivery capacity in terms of outputs was good. Though, not all outputs were fully delivered, their quality is deemed good. As exposed above, many targets were exceeded. For instance, the Biosafety Law and the two Regulations, were endorsed by the Turkish National Assembly even before the Project started. To a large extent, the good delivery rate was due to the strong National ownership, relying on clearly identified National needs and capabilities as well as on the leadership capacity of the Competent National Authority. Several stakeholders' engagement and partnerships, including the private sector, as in the case of the laboratories, were catalytic. Last but not least, the engagement and capabilities of concrete people made a difference as in the case of the Project Assistant and the Project Management Unit that carried on the day-by-day tasks while promoting networking, partnerships and team-work.

79. All the above notwithstanding, a fully coherent judgement over Outputs' delivery is challenged by the fact that, in a number of cases, Outputs' features, per se, are not well specified. For instance, "training" is used as a broad category covering from short awareness-raising sessions to specific "know-how" capacity building workshops. The assessment of participants' entry and exit profiles is not systematically performed. Final assessment is mostly limited to the degree of satisfaction of the participants.

80. In conclusion, the Outputs delivery has been rated **Satisfactory (S)**.

5.4.2 Achievement of Direct Outcomes

81. The Evaluation assessed to what extent the actual delivery of the Outputs outlined in previous Section 5.4.1 has produced, or has the potential to produce, in the short-medium term, the institutional changes and systemic effects (Direct Outcomes) conducive to a fully operational National Biosafety Framework (Main Outcome) as well as to the Intermediate States (IS) leading to the envisaged Global Environmental Benefit (See TOC). On this basis, this Section presents a qualitative analysis and interpretation of the Outcomes achieved in the light of the reconstructed Theory of Change (TOC) from Outputs to Outcomes, outlined in Diagram 1.

82. This assessment is challenged by the gaps of the Project in the Outcomes' definition. Actually, as explained under Sections 5.2 "Quality of Project Design" and 5.7 "Monitoring and Reporting", the Project lacks Outcomes' indicators of achievement. Under these circumstances, the evaluation of Direct Outcomes is based on the reconstructed Theory of Change (Chapter 4) and on the hypothesis that the identified Outputs are meant to make a significant contribution to the achievement of the Project Direct Outcomes. Methodologically speaking, such an approach presents advantages, yet, it is not deprived of serious risk of "self-demonstration" of the project construct. Actually, any robust evaluation judgement is expected to rely on clear and agreed criteria (indicators) and evidence which is relevant to such criteria. As indicators are "conventions" and not "absolute-truths", in development dynamics, it is important that relevant stakeholders agree as to

33 Article 2 "Biosafety Information Exchange Mechanism of Turkey (BIEMT): Information exchange system to be established to inform the public and provide public participation by facilitating the exchange of information on a national and international level through scientific, technical and practical information and documents on GMO and products thereof"

which indicators should be used for steering and assessing progress. Additionally, the process of indicators' construction is highly instrumental to the inherent "capacity building" requirements for the implementation of the public action supported by a project. "Desk-constructed" indicators do not successfully meet such requirements and fail in being instrumental both to a desired change as well as to the measurement of this change (to register to which extent and if any change has occurred).

83. Triangulation of data underpins current evaluation judgment. It is in this perspective that stakeholders' perception of Outcomes' achievement constitutes a reference (see Section 2.1.) alongside the GEF Tracking Tool which encompasses key information structured along the NBF components and it is filled in by the Project national team in three different stages (beginning, mid-term and end of the Project). It is to be noticed that the stakeholders consulted during the final evaluation were those identified in the ProDoc and actively integrated into the Project implementation. As explored under Section 3.3 (Stakeholders), they may not include all those who potentially "are affected by, or who could affect (positively or negatively) the project's results"³⁴.

84. As further exposed under Section 5.7 "Monitoring and Reporting", the project monitoring was on Activities and Outputs. Only on the occasion of the final evaluation exercise, relevant information was gathered and used as evidence of Direct Outcomes' achievement; e.g. statistics regarding the Biosafety Board decisions, the Laboratories' tests or the "updated list of Strengths and Weaknesses" related to the stocktaking report.

85. The evaluation confirmed that the four Outputs clusters have significantly contributed to the achievement of the four Direct Outcomes that represent the suitable change to be achieved in every component of the NBF. The stocktaking / baseline assessment (preliminary Output) was instrumental to the implementation of the project as a whole and to the delivery of each cluster of Outputs and, consequently, to the achievement of the four Direct Outcomes.

86. The final evaluation confirmed the relevant role of the five out of the six main drivers identified in the TOC; namely: **a)** the existence of the Nat. Biosafety Framework³⁵; **b)** the experience gained by the National Executing Agency (the Min. of Food, Agriculture and Livestock) during the previous Project "Development of the Nat. Biosafety Framework" (2002-2005); **c)** the coordination role of the two CNAs (1- Ministry of Food, Agriculture and Livestock and 2- Ministry of Forest and Water Affairs); **d)** the functional and harmonious coordination between the two NCAs; **e)** the existence of clear Regulations and Guidelines. Regarding the driver related to the participatory methods (the identification of appropriate participatory methods that are effectively implemented all along the decision-making process), its relevance was confirmed but, the results are not satisfactory.

87. The two relevant assumptions have positively evolved; namely: **a)** the Biosafety Board³⁶ is able to play its decision-making role; **b)** Human resources trained by the Project are retained after its end and are fully operational.

34 "Stakeholder Analysis in the Evaluation Process", UN Environment, EO. The Evaluation Office of UN Environment identifies stakeholders broadly as all those who are affected by, or who could affect (positively or negatively) the project's results. ... UN Environment recognizes the nine major groups as defined in Agenda 21: Business and Industries, Children & Youth, Farmers, Indigenous People and their Communities, Local Authorities, NGO's, the Scientific & Technological Community, Women, Workers and Trade Unions. Stakeholders' needs and interests should be disaggregated by gender (especially focusing on differentiated intervention strategies to address the needs of women and children) and representation (e.g. marginalised groups, indigenous peoples etc)throughout the evaluationstakeholder involvement needs to be based on a sound analysis of the project's stakeholders and the roles they play in bringing about change or the ways in which they are affected by change.

35 Elaborated in 2005, Phase I, Project "Development of Biosafety Framework".

36 In the ProDoc referred as National Biosafety Committee / NBC

88. The confirmation of those Drivers and Assumptions brings consistent evidence underpinning the judgement that results at the Direct Outcomes level were reached. More in particular, we can mention the following:

89. The Direct Outcome 1 was achieved to a highly satisfactory level, in the perception of the relevant stakeholders that actively participated in the final evaluation exercise. In fact, all underpinning Outputs (from Output 2 to 6) were delivered. Moreover, in the GEF Tracking Tool, question 2 on Regulatory Regime, the final assessment rates 3³⁷ against rate 2³⁸, at the beginning of the Project.

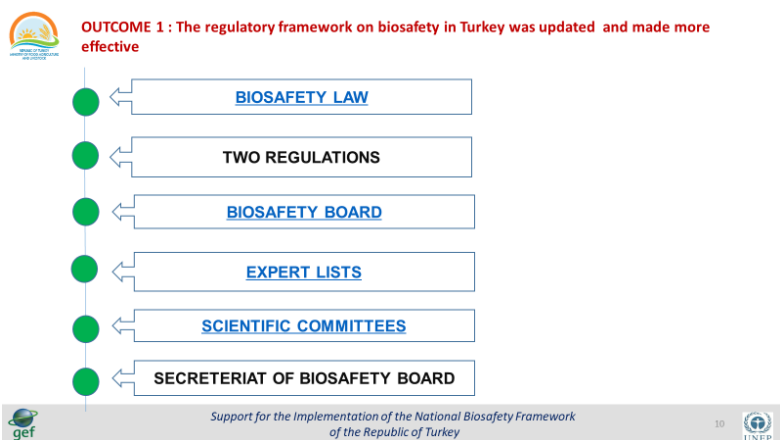
90. The final evaluation considers as additional evidence of performance the fact that the two Regulations were produced in a timely manner and entered into force at the same date with the Biosafety Law, 26th September 2010, between Phase I and Phase II of the NBF projects, showing national ownership and marked leadership over the process of the Regulatory Regime setting.

91. Actually, the Turkish Government and relevant stakeholders carried on the whole process in full ownership and assumed the financial costs face to the Project's administrative delays in its starting. Generally, the process has been and still is carried on by the National stakeholders, fully ensuring the continuity after the end of the Project, as discussed in Chapter 8 (Sustainability).

92. The Project was highly instrumental to the process. On this respect, the evaluator shares the Turkish partners perception about the **catalytic role of the Project**; which triggered an acceleration of the process, aggregating stakeholders and a relevant number of participants around an array of training, sensitization / awareness raising and exchange sessions, even with international exposure.

93. During the evaluation exercise, the need for revision of the Law and Regulations was clearly expressed. The Law is considered very strict and not business-friendly, implying high risks for the economic agents, including the possibility of imprisonment in case of alleged breach of the Law, which actually occurred in some cases. To the final evaluation perception, these and other similar shortcomings do not downgrade the Project's achievements. Instead, they constitute evidence of the dynamism of the process and confirm the TOC that considers Project's Main Outcome as a step in the causal pathway to the achievement of the Impact, as explored in the following Section, 5.4.3 Likelihood of impact. Box 2, here below, prepared by the Project Team, provides the main elements of the Regulatory Regime (Direct Outcome 1).

Box 2 Outcome 1 "Regulatory regime in place and legally mandated"



37 "The Regulatory Regime has full legal force, is operational and linked to the administrative system; i.e. used for decisions".

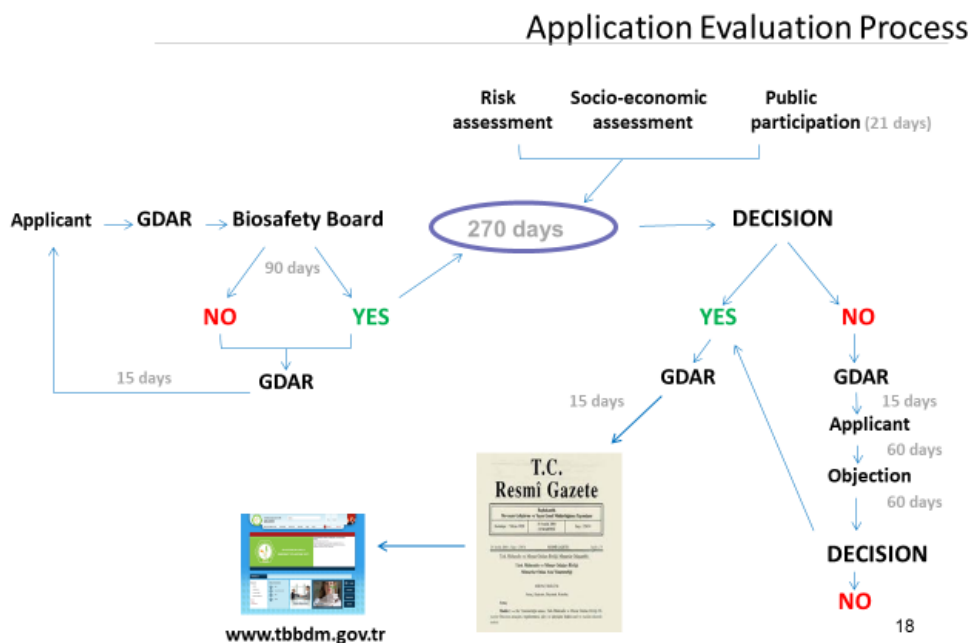
38 "A Regulatory Regime has been developed and adopted but does not yet have legal force".

94. The Direct Outcome 2 was achieved to a highly satisfactory level, in the perception of the relevant stakeholders, that actively participated in the final evaluation exercise. In fact, all underpinning Outputs (from Output 7 to 10) were delivered. Moreover, in the GEF Tracking Tool, Turkey registers progress, from rating 2, at the beginning of the Project, to rating 3, which indicates that “Requests have been received, proceeded, and decisions communicated to BCH. Appeal procedures designed and operational”. However, missing a “national budget allocation” supporting the system, the forth level of achievement (rate 4) is not yet accomplished. Turkey is fully performing in relation to “risk assessment procedures employed and contributing to decision-making”, rating 4 against rate 2, at the beginning of the Project. Actually, socio-economic considerations are incorporated into the decision-making system and such procedure is legally bound by the Biosafety Law 2010.

95. The Evaluation considers the important number of applications handled and decisions made as an evidence of a performing Administrative system. From 2010 to 2015, the Biosafety board handled 123 applications, of which 48 deserved positive decisions, 32 negative and 49 were withdrawn³⁹. Additionally, the Application Evaluation Process, as shown in below box 3, is clear and in compliance with the CPB relevant articles 10, 11, 12 and 26. Particular shortcomings to its implementation were not referred to by the stakeholders during the evaluation.

96. It is also to be noticed that Turkey is one of the few countries where the socio-economic considerations are mandatory to the decision-making process. For this reason, some partners expressed the view, shared by the Evaluation, that through the UN Environment network, the Project could have promoted, in a more dynamic manner, further exchange of experience with other countries, giving visibility to the Turkish achievements, and on the other hand, triggering knowledge-building dynamics on this demanding topic.

Box 3 Application Evaluation Process in Turkey



³⁹ Data presented by the Biosafety Board during the evaluation (Power-point “IMPLEMENTATION of BIOSAFETY BOARD”, Prof. Dr. Hakan YARDIMCI)

97. The Direct Outcome 3 was achieved to a satisfactory level, in the perception of the relevant stakeholders that actively participated in the final evaluation exercise. In fact, all related Outputs (from Output 11 to 15) were delivered. To the final evaluation judgement, the number of samples and tests performed in the network of 54 laboratories, relying on harmonized methods and accredited by an independent Public Accreditation Body - Turkish Accreditation Agency (TURKAK), provides evidence of capacity delivery of the monitoring and inspection system. Stakeholders did not mention relevant shortcoming of the referral system.

98. Concerning Human Resources capacity in relation to the “Enforcement” component of NBF, the final evaluation was challenged by the serious gaps in achieving a systematic approach to capacity building. Training evidence supplied by the Project’s reporting system regarded inputs provided (e.g. number of training sections and engaged participants) rather than outputs (e.g. comparing exit to entry profile) and outcome indicators, the latter requiring a follow-up system to check the effective delivery capacity of the human resources after the training received, identifying possible gaps and remedies (e.g. follow-up training).

99. The Direct Outcome 4 was achieved to a moderately satisfactory level, in the perception of the relevant stakeholders that actively participated in the evaluation exercise. In fact, the related Outputs (from Outputs 16 to 18) were only partially delivered, as mentioned in the previous Section 5.4.1 (Outputs delivery). In the GEF Tracking Tool the three criteria referring to Information, Education and Participation present an uneven performance. It is also to be noticed that, in the ProDoc, Outcome 4⁴⁰ addresses the requirement of a “Functional system for public awareness and participation” whereas Education is not mentioned and there are no planned Outputs for it.

100. Most “training” sessions related to Outcome 4 focused on awareness-raising, but, the presumed multiplying / snow-ball effect was not measured. Equally, the Evaluation did not find any assessment of the quality and of the effectiveness of the brochures or other public-awareness material and activities. Hence, any informed judgement on the direct results, deriving from such activities and outputs, is limited.

101. Awareness raising concerns are a top priority for all stakeholders, including high-level public administration officials, academics and private sector, yet, public awareness and participation may be not a clear and shared concept. As a matter of fact, building up a shared strategic vision on Public Participation is a core challenge not yet effectively addressed. As a high-level official pointed out, the “new language is manipulative”, whereas “convincing people” is something different and more demanding. It was also explained that “People have been informed about how the system works but the public opinion is still blocked”.

102. Awareness-raising was intended to promote attitude change of the general public as well as of a number of selected groups (e.g. politicians, judiciary, scientists). Social sciences have demonstrated that often “Manipulative language” and social-market strategies do not lead to lasting behaviour change. Behaviour change requires trust (underline / root causes) which is not just the direct result of information, divulgation, and social-marketing. Instead, dialogue may constitute a sustainable platform for building people’s trust, in this case, towards the NBF as a functioning system that guarantees biodiversity and people’s health. To note that sometimes, the focus of the message is not clear, shifting from the core issue of building trust to the NBF towards changing views in relation to the GMOs; which is not and cannot be one and the same. Moreover, dialogue means a bilateral process, implying a shift in the attitude of all parts. These core aspects were not taken on board by the Project.

103. The relevant achievement registered in terms of establishing the key mechanisms for “Public-awareness – Information – Participation”, up to the level of public involvement in LMO

40 Outcome 4, according to the TOC, but number 5 in the ProDoc

decision-making, as shown in the box 4, has not yet triggered a virtuous cycle, unblocking public opinion by ensuring that *“the potential benefits of modern biotechnology can be captured in a fully legal and transparent manner⁴¹”*.

Box 4 Public awareness – information – participation mechanisms (BIEMT)

According to the Biosafety Law, Article 3 (8) and Article 8 (e), the Board decisions shall enter into force upon being issued on the Official Gazette. Additionally, the scientific reports regarding the risk assessment and socio-economic evaluation of the applications for GMO and products thereof shall be made public by the Board via the Biosafety Information Exchange Mechanism of Turkey (BIEMT). The Biosafety Information Exchange Mechanism of Turkey (BIEMT) has been put into service since 5th of October 2010 to facilitate the national and international exchange of scientific, technical and practical information and documents regarding GMO and products thereof; to inform the public and to serve the public participate into decision making process.

104. Considering the level of achievement of the four Direct Outcomes, important to attain the Main Outcome and the subsequent Intermediate States⁴² and, on the other hand, the key constraints still experienced in relation to Direct Outcome four, the achievement of Direct Outcomes was rated **Moderately Satisfactory (MS)**.

5.4.3 Likelihood of impact

105. Outputs and Outcomes analysed above have to be understood along the whole causal pathway as exposed in the TOC, where “a fully effective Biosafety Framework in Turkey” (Main Outcome) is not the end result but the first condition for progressively achieving high international standards in Risk Assessment and Risk Management, consequently ensuring “Enhanced Conservation and Sustainable Use of Biological Diversity in Turkey”.

106. The Competent National Authority (CAN) delivery capacity is being gradually built, progressively evolving to higher-level results, Intermediate States (IS), from IS1 to IS3, which may be achievable under a number of assumptions and drivers, as described in Section 4.3 and visualised in Diagram 2.

107. Core assumptions and drivers are currently confirmed, such as the CNA role and the GMO management system in place and functioning to a satisfactory level. In compliance with the Biosafety Law, funding is ensured through the Ministry of Food Agriculture Livestock and, in minor scale, by the applicants.

108. Political will⁴³, in relation to the CPB engagements, is confirmed to a satisfactory degree, through the relevant achievements and the outputs delivered in the last decade, as extensively discussed previously (Section 3.1, Context, 5.4.2, Outcome 1 on Regulatory Regime). However, a National Action Plan to streamline national policy on Biosafety into government plans is not in the Agenda at the moment. Moreover, it is not yet clear if Biosafety will be encompassed into the next NBSAP (National Biological Diversity Strategy and Action Plan), starting from 2018.

109. Effective forms of stakeholders’ participation (in planning, decision making and funding), conducive to open and transparent information flows and negotiation processes at different levels,

41 ProDoc § 9

42 See TOC, chapter 4.3

43 Sometimes people refer to “political will” in the sense of a certain “openness” to the GMOs introduction into a country. Therefore, the following due distinction is made; herein, “political will” refers to a Government willingness to comply with the CPB and in particular Article 1 in accordance with the “precautionary approach contained in Principle 15 of the Rio Declaration on Environment and Development” (CPB, Article 1, Objective).

are still to be strengthened and confirmed, but, steps have been taken through the delivery of relevant outputs as the National BCH (BCHMT, Biosafety Clearing-House Mechanism of Turkey).

110. All in all, and subject to the above-mentioned constraints, not all the project's intended Outcomes were fully achieved, the Assumption for progress to Intermediate States (IS) hold partially and the Drivers to support transition to IS are also partially in place. Therefore, the Project Impact (Enhanced Conservation and Sustainable Use of Biological Diversity in Turkey) is rated **Moderately Likely** to be achieved to the medium-long term.

5.5 Financial Management

111. All the dimensions of the financial management were satisfactorily or, in several cases, highly satisfactorily addressed, by the Project (see table 6 below). Information about actual project costs and co-financing used were supplied by the Project Administrative Assistant, yet not all data are disaggregated (see financial tables in Section 3.6). Consequently, overall rating is **Highly Satisfactory (HS)**.

Table 6 *Financial Management Table*

Financial management components:		Rating	Evidence/ Comments
Questions relating to financial management across the life of the project:			
Compliance with financial requirements and procedures of UN Environment and all funding partners (including procurement rules, financial reporting and audit reports etc)		HS	Financial reports have been regularly provided (quarterly) and are filed in ANUBIS platform. Inventory reports have been prepared in the last three years and uploaded in ANUBIS platform, including the terminal inventory. Audit Reports have regularly been implemented and yearly uploaded in ANUBIS. A final auditing (2017) yet to be uploaded. Procurement rules have been correctly followed.
Timeliness of project financial reports and audits		HS	Financial reports and audits have been presented timely
Quality of project financial reports and audits		S	Up to the standard
Contact/communication between the PM/TM & FMO		HS	Through Periodic Progress Reports, Financial Reports, field visits of the Task Manager and constant communication (email). Participation to the annual meetings of the NPCs, problem-solving through exchange with other Projects' Admin. Assistants
PM/TM & FMO responsiveness to addressing and resolving financial issues		S	
Questions relating to financial information provided during the evaluation:			
Provision of key documents to the evaluator (based on the provision of A-F below)		S	
A.	An up-to-date 'Co-financing and Project Cost's table	Y	Only partially, not by Project Component

Financial management components:		Rating	Evidence/ Comments
B.	A summary report on the project's annual financial expenditures during the life of the project.	Y	In ANUBIS and during the country visit (see Chapter 2.2)
C.	Financial documents from Mid-Term Evaluation/Review (where appropriate)	na	
D.	All relevant project legal agreements (e.g. SSFA, PCA, ICA) – where appropriate	Y	In ANUBIS and at the Project Office, during the Evaluation
E.	Associated financial reports for legal agreements (where applicable)	na	
F.	Copies of any completed audits	Y	All available in ANUBIS and “validated” by sample during the country visit
Demonstrated knowledge by the PM/TM & FMO of partner financial expenditure		HS	
PM/TM & FMO responsiveness to financial requests during the evaluation process		HS	
Overall rating		HS	

5.6 Efficiency

112. The Project implementation was carried out without major delays, it was smooth and efficient. A no-cost extension of 11 months (including 6-month extension for administrative closure) was granted to allow completion of certain activities.

113. The Project built on the pre-existing institutional capacity and institutional memory acquired through the previous Phase I, particularly at the level of the NEA (MFAL). Actually, the Project built on pre-existing agreements and partnerships among relevant national stakeholders promoting synergies and complementarities, as described in Section 3.3 (Stakeholders) and 5.4.1 and 5.4.2 (Effectiveness).

114. A remarkable Public-Private partnership has been established for the upgrading of the GMOs reference laboratories, as described in chapter 5.4, which has permitted to significantly increase the number of planned GMOs laboratories in the country, from 5 to 54.

115. Everything considered, Project's Efficiency is rated **Satisfactory (S)**.

5.7 Monitoring and Reporting

5.7.1 Monitoring design and budgeting

116. The Project Document included (as in all GEF /UN Environment Projects) a costed Monitoring and Evaluation (M&E) Plan (Appendix 7 to the ProDoc), with a forecast of 45,000 USD (\$20,000 from GEF budget and a co-financing of \$25,000 USD), which, however, was not reflected in the Project budget (UNEP format) that only had an allocation of 6,000 USD for Monitoring and Evaluation.

117. A relevant number of M&E tools are incorporated in the ProDoc appendixes; namely:

- Appendix 3 (Incremental Cost Analysis);

- Appendix 4 (Results Framework);
- Appendix 5 (Work Plan);
- Appendix 6 (Key Deliverables and Benchmarks);
- Appendix 7 (Costed M&E work plan);
- Appendix 8 (Reporting Requirements);
- Appendix 9 (Standard Terminal Evaluation TOR).

118. Outputs' indicators are SMART⁴⁴ and clear. Baseline and means of verification are also specified, with few exceptions, where outputs are not properly quantified (e.g. Guidelines, Public awareness). The picture is different regarding Outcomes' indicators, which are totally missing. Outcomes refer to results that represent complex changes. To capture any degree of achievement, a set of inter-complementary, qualitative indicators, is required. Yet, the "Project Results Framework", Appendix 4, does not provide specific Outcome indicators. As also explained in Section 5.4.2 (Achievement of Outcomes), the evaluation was challenged by this gap.

119. Plans for collection of disaggregated data are partially addressed by Appendix 7 (Costed M&E Work Plan) and by Appendix 4 (Project Results Framework), leaving, however, large room for improvement. For instance, concerning training, targets are spelled out in terms of number and type of participants, whereas "means of verification" refer to "Proceedings of the training, and List of participants", which are relevant, but insufficient elements for a consistent data collection system. (On that, see Section 5.4.2.). Data collection methods and tools were not adapted to integrate Human Rights & Gender Equality (HR&GE) dimensions as well as the Project's diversified impact on different stakeholders. The Project Monitoring and Evaluation (M&E) system remained blind to the fact that different interests may exist between and within groups and that the Project may influence in diverse ways the different stakeholders involved in, or possibly affected by the Project. Consequently, the steering of the Project was deprived from data triangulation, based on the diversity of perceptions and interests. Data were not disaggregated by sex⁴⁵.

5.7.2 Monitoring implementation

120. The setting of a stakeholders' Steering Committee was instrumental to the overall, strategic steering of the Project. The annual regional meetings organised by UN Environment Task Manager (TM) for the Project Teams of a group of countries were also very useful for exchange, mutual learning and, to a certain extent, to a shared self-evaluation of projects' progress and problems.

121. The Project was implemented in such a way as to comply with § 93 of the ProDoc on supervision and adaptive management and, during the inception workshop, the "supervision plan" was communicated by the TM. Yet, *"emphasis on outcome monitoring"*, as required in § 93 of the ProDoc, failed to duly meet standards. As a matter of fact, a comprehensive Monitoring System was not effectively set-up and the Project management did almost exclusively rely on the Work Plan (Appendix 5) for steering the process, hence focusing on Activities implementation and, to a certain extent, on Outputs delivery. In fact, the final PMU report is activities-focused. The term "lessons learned" is misused. For instance, "lessons learned" chapter of the final report is about a narrative on activities evolving along the timeline of the Project implementation.

122. Having said that, it has to be recognised that the Project Management Unit (PMU) was very scrupulous in steering the Project through the Work Plan and the Task Manager (TM) was also

⁴⁴ Specific, Measurable, Achievable, Relevant and Time-bound.

⁴⁵ See more on UNEG / UN Evaluation Group guidance document on "Integrating Human Rights and Gender Equality in Evaluations", 2014.

remarkably perseverant in supporting the national team in carrying out, in an efficient way, its steering tasks, including monitoring and planning.

123. Monitoring of Project Expenditures by Project's Component (Outcomes), is a valuable steering tool and an indicator for monitoring the progress of the Project towards its expected Outcomes. However, as visualised in Table 2 of Section 3.6 (Project Financing), the monitoring of the Project expenditures was not done by component.

5.7.3 Project Reporting

124. Progress reporting was regularly and timely delivered twice a year. The Project Implementation Review (PIR) was yearly implemented. Feedback and adjustments to the reports from the Task Manager were timely provided (between the first draft report and the final approval, normally occurred less than one month). Communication channels were very functional and flexible, as explained by the PMU. The Task Manager support was outstanding in addressing reporting requirements and Work Plan implementation in a timely fashion, using flexible communication channels (e.g. phone calls and messaging) and not just the ANUBIS circuit, a fact much appreciated by the National team.

125. Disaggregated data are totally missing in all Project's reports, reflecting the fact that the project design was blind to the diversity of interests / stakes of the different stakeholders over the Project's results. Nevertheless, during the country visit, data disaggregated by gender were provided, in relation to training participants and to the membership of NBF bodies and Project entities.

126. Data systematization (aggregation / disaggregation) along operational criteria for the effective steering of the Project is weak. The Evaluation actually noticed that, although stakeholders keep data and statistics, they do not effectively transform them in indicators for the steering of the process. At the evaluation's request to provide evidence of results and performance, the question on "what evidence may consist" was raised and the Consultant did facilitate the national partners in identifying data that could provide underpinning evidence of progress. For instance, that was the case of data on labs' performance or on Biosafety Board decisions, which, although available, were not systematized and used as indicators for the steering of the process and for measuring Project's performance.

127. All in all, instruments of reporting / steering were filled-in in a bureaucratic manner as confirmed through the desk review and during the field visit of the evaluation. For instance, in the Project Implementation Review (PIR), elements of analytical judgement are systematically missing. Reporting is provided at the level of the delivery of activities and outputs, yet, the progress is not rated although this is clearly required by the PIR format. Rating and critical approach through comments are not provided either from the PMU or the TM. The GEF Tracking Tool also is handled mostly as a reporting obligation rather than an opportunity for analysis, critical approach, learning and adaptive management.

128. During the field visit, the PMU took consciousness of the fact that the Project Implementation Review (PIR) format is coherent to "outcome monitoring", as required under § 93 of the ProDoc, but, it was not properly used in the Project. Actually, in PIR, all reported indicators under the Outcomes are just the Output indicators and, up to the final evaluation this important methodological gap was not identified.

129. All the above brings evidence of serious gaps in M&E setting-up and implementation. Such gaps are particularly relevant in a Project aiming at Capacity Building and Human Resources strengthening. Actually, the setting and implementation of a Project's M&E system may provide a great capacity building opportunity and, in this case, to a good extent, it has been a missed

opportunity. It is obvious that the M&E gaps pointed out above reflect structural institutional weaknesses of the UN Environment rather than of the single Project in question.

130. Therefore, the assessment and rating of Monitoring and Reporting is an informed judgement not specifically referring to the Project's performance, but, rather, to the overall Monitoring and Reporting System put in place by the Implementing Agency (UN Environment). As visualised in the Rating Table 7, Section 6.1, the rating of the components of the System is uneven, and the overall rating is, everything considered, **Moderately Satisfactory (MS)**.

5.8 Sustainability

131. The evaluation analysed to what extent the follow-up work had been initiated and how project results could be sustained and enhanced over time. Three aspects of sustainability were addressed: a) Socio-political sustainability, b) Financial sustainability, c) Institutional sustainability.

5.8.1 Socio-political sustainability

132. The sustainability of project outcomes has a high degree of dependency on social/political factors. Moreover, there is strong ownership, interest and commitment among government and among other stakeholders, as extensively elaborated under previous sections (5.4.1 and 5.4.2). A generally conducive environment is ensured by Turkey's commitment to biodiversity and to biosafety, as proved by the CBD ratification in 1997, the CPB ratification in 2003 and by the formulation of successive NBSAPs (the first National Biological Diversity Strategy and Action Plan was launched in 2001, updated in 2007 for ten more years and in 2018 a new NBSAP is going to be prepared). On the same token, the 9th and 10th Development Plan of Turkey, the Agricultural Policy of Turkey, the Vision 2023 / Science and Technology Foresight⁴⁶, the "National Strategy and Action Plan on Biotechnology R&D and Innovation"⁴⁷, as exposed in Section 3.1 (Context), constitute a conducive environment to the sustainability of the achieved direct outcomes.

133. However, a number of factors may seriously challenge the NBF effectiveness. Narrow and extremely severe interpretation of the Biosafety Law by the Judiciary may impact negatively on the Law quality (foreseeability) and may "block" the functioning of the system, as argued by many stakeholders. Public opinion is generally averse to GMOs⁴⁸, a fact that may also jeopardise the NBF authority, credibility and, eventually, its effectiveness.

134. As a matter of fact, Turkey is experiencing a dynamic environment as things evolve. As expressed by virtually all stakeholders, one of the most important challenges still lies ahead, and it consists in the capacity of the NBF to strengthen mechanisms and modalities for effective public awareness and participation. Deeming that an important feature of the current situation is a "blocked public opinion", as an Official of the Turkish administration pointed out, and that a chain is only as strong as its weakest link, a blocked public opinion may end up blocking the NBF. (See also Section 5.4.2 as well as Conclusions and Recommendations). As exposed under Section 3.3. (Stakeholders) and Section 5.2. (Project design), the Project was blind both to Gender Equality and to Human Rights, hence lacking elements for an evidence-based judgment on such relevant parameters of socio-political sustainability. Generally, mitigation mechanisms, to adapt to changes in the social/political

46 Under the heading of expected outcomes in the Final Report on Agriculture and Food Panel prepared within the scope of the TUBITAK Vision 2023 NOT VERY CLEAR WHAT IT IS

47 Approved with the High Planning Council Resolution no. 2015/27 of 18/06/2015 and entered into force upon being issued in the Official Gazette no. 29399 of 27/06/2015

48 According to virtually all stakeholders' perception

context were not promoted by the Project, e.g. relevant social norms and/or political priorities were not identified and discussed with stakeholders during the Project.

135. Everything considered, Socio-political sustainability is **Moderately Likely (ML)**.

5.8.2 Financial sustainability

136. The Biosafety Law guarantees the financial sustainability of the NBS, as spelt out under its Section Three (Duties and Authorization of the Ministry and the Board and Committees, Duties and authorization of the Ministry, Article 8 and 9).

137. The Project stakeholders did not express any concern on the future financial sustainability of the National Biosafety Framework. They believe that the Assumption formulated in the TOC (see Diagram 2) regarding the effective availability of financial resources is fully satisfied through the Law. Financial Sustainability is therefore rated **Highly Likely (HL)**

5.8.3 Institutional sustainability

138. The institutional framework of Biosafety in Turkey is clearly formulated in the Biosafety Law that established the National Competent Authority, the Biosafety Board, the Scientific Committees and the List of Experts. Institutional arrangements and modalities of partnerships have been implemented and are being consolidated, as demonstrated, for instance, by the very high number of decisions made on GMOs applications. Institutional Sustainability is rated **Highly Likely (HL)**.

6 Conclusions and Recommendations

6.1 Conclusions

139. Turkey's biological diversity is relevant. Unregulated introduction of products of modern biotechnology could lead to loss of wild and agricultural biodiversity, hence, the Turkish's authorities have a genuine interest over biosafety and aim at an effective National Biosafety Framework (NBF) *"to ensure that the potential benefits of modern biotechnology can be captured in a fully legal and transparent manner"*⁴⁹.

140. Since 1998, Turkey is Party to the Convention on Biological Diversity (CBD) and started participating in the preparation of CPB, signing the Protocol in 2000. CPB entered into force in Turkey in January 2004⁵⁰. The Ministry of Food, Agriculture and Livestock (MFAL), General Directorate of Agricultural Research and Policies (GDAR) has been appointed as National Focal Point for the Protocol and Competent National Authority (CAN).

141. Turkey benefited from Phase I, "Project on the Development of Biosafety Frameworks", 2002 – 2005, at the end of which, full alignment with CPB was still pending, in terms of Administrative and Institutional arrangements, including infrastructures, as food control laboratories, and human resources capacity. The public awareness on LMOs was substantially raised, yet, *"disinformation"*⁵¹ too. These were issues to be addressed through the Phase II, NBF implementation, started in September 2013; which could rely on relevant previous achievements in terms of partnerships, synergies and institutional capacities, including CNA institutional memory built during Phase I. Moreover, the "Law on Biosafety" as well as two Regulations entered into force in September 2010.

⁴⁹ ProDoc, § 9

⁵⁰ Law No. 4898 published on the Official Gazette No. 25148 of 24.06.2003

⁵¹ ProDoc § 4

142. Based on the rationale that *"the capacity is still not enough to protect genetic diversity against the adverse effects of LMOs⁵²"*, the Biosafety Law prohibits any deliberate environmental release of LMOs. As a matter of fact, environmental release and LMOs production is a highly strategic debate evolving along social, political, ethical, environmental and vital economic considerations. Taking the long view, in the global food market, Turkey and its commercial partners are still considering which the best option to foster, i.e. organic or genetically modified⁵³. Yet, at this stage, poultry value chain represents a pressing economic factor that requires huge quantities of feed which, to be accessed at competitive prices in the global market, has to be GMO.

143. Currently, Turkey has in place all NBF components, including a Biosafety Law that underpins the NBF, defining the Authorities, their mandate and the means for their functioning. CNA, staffed by a small group of employees, is institutionally and financially underpinned by MFAL, and ensures the Secretariat of the Biosafety Board; which since its setting-up is regularly working and deliberating as the relevant number of decisions may prove. The List of Experts and the Scientific Committees are also functioning.

144. Although, in terms of Regulatory regime, Turkey registered consistent progress, several stakeholders consider that the Biosafety Law is strict and often interpreted by the judiciary in a very severe manner. Additionally, although people have been informed how the NBF system works, trust is not there⁵⁴. These are relevant shortcomings that may still challenge the smooth functioning of the NBF system.

145. The Terminal Evaluation was asked to provide an informed, evidence-based judgement on the following four **key strategic questions**, i.e.:

- To what extent was the project able to assist Turkey to establish and consolidate a fully functional and responsive regulatory regime that responds to its obligations under the Cartagena Protocol on Biosafety as well as its national needs for a viable and profitable National Biosafety Framework?
- To what extent was the project able to develop institutional and technical capacity, awareness and participation amongst the key actors to ensure that biosafety becomes part of their permanent action?
- To what extent was the project able to assist Turkey to establish and consolidate a functional national monitoring system for Biotechnology to follow up on the releases of Living Modified Organisms (LMOs) and their possible effects on the environment?
- To what extent are the outcome indicators verifiable, and record progresses towards the achievement of the development objectives, as well as the obligations under the Cartagena Protocol?

146. On the first three questions, based on triangulation of findings and particularly on the perception of the relevant National stakeholders, the Terminal Evaluation may confirm the full ownership of the Turkish authorities and stakeholders over the process of NBF building-up, as demonstrated throughout the Project implementation and during the Terminal Evaluation. It is in this context, of full National ownership and leadership, that the Project did play a catalytic role⁵⁵.

147. The Project was highly instrumental to the NBF development and implementation, triggering an acceleration of the process, aggregating stakeholders and a relevant number of participants around an array of activities, e.g. awareness-raising / training sessions, experience exchange meetings, also at international level, training for laboratory people and customs officials. It was also

⁵² ProDoc § 4

⁵³ As explained by a high Official of the Turkish administration

⁵⁴ As referred to the evaluation during the country visit.

⁵⁵ See more on Project's catalytic role under § 92 (5. Findings, 5.4.2 Achievement of Outcomes)

provided qualified support for the preparation and publication of guidelines as well as communication material and, partially, for the upgrading of the National BCH⁵⁶. UN Environment network was highly instrumental to the exchange of experience and knowledge-building.

148. However, Turkish achievements in encompassing socio-economic considerations in the decision-making process was not sufficiently explored, e.g. by further promoting exchange with other countries, triggering a knowledge-building dynamic on this demanding topic. Additionally, the Project was Human Rights and Gender Equality blind (See Sections 3.3, Stakeholders; 5.2, Project Design; and 5.8.1, Socio-political sustainability). Stakeholders are not classified along the key feature of “Duty-bearers” and / or “Rights’-holders”. Possible vulnerable groups and local communities remained at the margins of the Project. The Project did not succeed in addressing the gaps noted in public awareness and participation (see § 145 and Sections 5.4.2, § 100 – 104, and 5.8.1).

149. Eventually, and in relation to the fourth question, the evaluability of the Project was challenged by the absence of outcome indicators⁵⁷. Relevant gaps in the monitoring and evaluation (M&E) system limited, to a certain extent, an evidence-based judgement on the Project’s progress towards the achievement of its objectives, including the obligations under CPB. Therefore, the oversight of the M&E system by UN Environment as the Implementing Agency, presents an opportunity for further improvement.

Table 7 Evaluation Criteria and Ratings Table

Criterion (section ratings A-I are formed by aggregating the ratings of their respective sub-categories, unless otherwise marked)	Summary Assessment	Rating
A. Strategic Relevance	Very satisfactory in all aspects.	HS
1. Alignment to MTS and POW	Well aligned with MTS (2010-2013 and 2014-2017), Sub-Programme Environmental Governance, Expected Accomplishment (EA) b and (EA) 2.	HS
2. Alignment to UNEP/GEF/Donor strategic priorities	Project belongs to GEF Biodiversity Focal Area, Strategic Programme 6 (BD-SP6): “Building Capacity for the Implementation of the Cartagena Protocol on Biosafety”.	HS
3. Relevance to regional, sub-regional and national environmental priorities	Relevant for the management and safe use of GMOs in the context of Sustainable Development at national and conducive to harmonized Regional priorities	HS
4. Complementarity with existing interventions	Builds upon GEF/UN Environment Project “Development of the National Biosafety Framework” (2002-2005). Biosafety included in the NBSAP.	HS
B. Quality of Project Design	Project Design Quality assessed in Inception Report and found satisfactory, yet weak against a number of relevant aspects such as sustainability and project preparation.	MS
C. Nature of External Context	Despite being challenging at national and regional level; the external context of the Project did not affect Project implementation	MF
D. Effectiveness ⁵⁸		MS
1. Achievement of outputs	Not all Expected Outputs were fully delivered.	S

⁵⁶ Biosafety Clearing-House Mechanism of Turkey / BCHMT.

⁵⁷ See in more detail Sections 5.4.2 Achievement of Outcomes; 5.7.1 Monitoring design and budgeting; 5.7.3 Project Reporting.

⁵⁸ Where a project is rated, through the assessment of Project Design Quality template during the evaluation inception stage, as facing either an Unfavourable or Highly Unfavourable external operating context, the overall rating for Effectiveness may be increased at the discretion of the Evaluation Consultant and Evaluation Manager together.

Criterion (section ratings A-I are formed by aggregating the ratings of their respective sub-categories, unless otherwise marked)	Summary Assessment	Rating
2. Achievement of direct outcomes	No all Direct Outcomes fully achieved, some of them in need of consolidation. Assumptions and Drivers hold partially.	MS
3. Likelihood of impact	Direct Outcomes partially achieved. Assumptions and Drivers for progress to IS hold only partially	ML
E. Financial Management		HS
1.Completeness of project financial information	Financial information available and administrative requirements fulfilled, yet not all data are disaggregated	S
2.Communication between finance and project management staff	In place throughout project life and effective	HS
3.Compliance with UNEP standards and procedures	Inventory reports regularly prepared and yearly audits submitted	HS
F. Efficiency	No major delays registered, but one 11-month no-cost extension was granted. The Project built on pre-existing institutional capacity, agreements and relevant partnerships.	S
G. Monitoring and Reporting		MU
1. Monitoring design and budgeting	Monitoring Plan not clearly reflected in the budget.	MU
2. Monitoring of project implementation	Monitoring System focused on Activities and Outputs, exclusively relying on the Work Plan. No Outcomes' indicator and monitoring taken on board for effective process steering.	MU
3.Project reporting	Reporting, based on GEF and UNEP M&E tools, timely delivered and ANUBIS uploaded. Report exclusively on Activities and Outputs. Rating and judgement elements missing.	MS
H. Sustainability (the overall rating for Sustainability will be the lowest rating among the three sub-categories)		ML
1. Socio-political sustainability	National policies, plans, and international commitments endorsed by Turkey as well as several achievements, including the full NBF set-up. Challenges from the strict Law, sever judiciary and adverse public opinion.	ML
2. Financial sustainability	Ensured by the Biosafety Law through the MFAL budget.	HL
3. Institutional sustainability	The Biosafety Law and the two Regulations set the Authorities, their mandate and means of action.	HL
I. Factors Affecting Performance		S
1. Preparation and readiness	Despite some weaknesses in the Project Design, the Project built coherently upon the previous Project "Development of the Nat. Biosafety Framework".	S
2. Quality of project management and supervision	Procedures of management up to the standards, yet presenting qualitative management gaps	S
3. Stakeholders participation and cooperation	Key role of the National Executing Agency and other relevant stakeholders; MFWA, Biosafety Board, Academics, private sector. Coordination, networking, partnership. Certain societal groups marginally represented.	S
4. Responsiveness to human rights and gender equity	No taken on board. Not referred to in any Project document from design to reporting.	U

Criterion (section ratings A-I are formed by aggregating the ratings of their respective sub-categories, unless otherwise marked)	Summary Assessment	Rating
5. Country ownership and drivenness	The NBF set-up fully relied on the National ownership and leadership (NCA capabilities, endorsement of the Biosafety Law and two Regulations, funding ensured after the end of the project). including the role of private sector (e.g. private laboratories).	HS
6. Communication and public awareness	Still to be clearly set-up and consolidated	MU
Overall project rating	Satisfactory	S

6.2 Lessons Learned

Lesson one: *National ownership and leadership are major factors of performance (delivery of Outputs) for sustainable achievements. Robust national initiative, leadership and ownership, based on national capabilities and commitment to a clear agenda, may ensure high rates of delivery in the process of NBF building-up (set-up and strengthening), although the “replicability” of these key aspects may vary from context to context.*

As stated in § 147 (conclusions) and elaborated on in several parts of this report (e.g. § 78, 91), it was in a context of full National ownership and leadership, that the Project did manage to play a catalytic role, triggering an acceleration of the process, aggregating stakeholders and a relevant number of participants around an array of activities. Yet, the Project was just instrumental to the NBF development and implementation and did not substitute any of the National actors.

Lesson two: *National stakeholders’ institutional memory plays a role as a major driving force, particularly in Projects addressing institutional building and human resources development. Projects may be catalytic in promoting and strengthening the institutional memory of national stakeholders.*

In the context of Turkey, this key driver was confirmed, as stated in § 142 (conclusions) and elaborated in this report under the TOC (including diagram 2) as well as § 38 and 108. For instance, in Turkey, it was also thanks to the two Projects (Phase I and II) for NBF Development and Implementation that the Competent National Authority (CNA), as Executing Agency, developed certain competences and had the opportunity to put them in practice because directly involved with all the dimensions of the implementation of the Project, also in the day-by-day activities, through the PMU staffed by CNA employees. In a process of institutional building and human resources development such good practices are relevant and may potentially be replicable in other contexts.

Lesson three: *Concrete people, women and men, make things happen. Projects may constitute for them a learning opportunity by providing the space for major exchange, for experimenting new paths and consolidating new skills, including soft skills.*

This is an important lesson that the final evaluation in Turkey did confirm. It was the engagement and capabilities of concrete people that made a difference; just to mention the Project Assistant and the Project Management Unit or the members of the Biosafety Board and Scientific Committees. The Project was an opportunity for several people to experiment, practice, exchange, take initiative and learn. Such soft skills’ development has been possible not only through the several training and exchange sessions, but also through the day-by-day work. Although these important results came about as a positive “side effect” of the Project, they may be replicable by supporting, in a more systematic way, the NBF institutions in promoting the development of soft skills.

Lesson four: *Participatory approach and teamworking are instrumental to a learning-building evaluation. For a successful learning-oriented evaluation process, both appropriate tools and attitude are key factors. For critical thinking, some tools are more propitious than others. Tools have to be inter-complementary and used in an adaptive manner, helping participants to take distance from events in which they personally played a role. Attitude is much about soft skills that have to be instrumental to trust building.*

In Turkey, the evaluation exercise largely relied on a horizontal approach, in a genuine research for the identification of the facts and their interpretation. Focus was given on the learning opportunity rather than on personal performance priorities (high degree of intellectual honesty). Open attitude was an explicit effort the fruits of which were positively and explicitly appreciated by the participants during the country visit. On the other hand, participatory approach, team and trust building, learning attitude and knowledge building are time-demanding activities that were challenged by the shortness of the country visit. However, appropriate tools and attitude triggered a much rewarding evaluation process as well as the achievement of evaluation's tasks to a satisfactory degree.

6.3 Recommendations

150. Based on the main Findings and Conclusions, the main evaluation mission's recommendations are the following:

Recommendation 1

To the CNA (Competent National Authority) Ministry of Food Agriculture Livestock (General Direction of Agricultural Research and Policy), regarding Public awareness and Participation shortcomings.

The Evaluation recommends working on and investing resources to address Public awareness and Participation shortcomings, possibly through a broad and inclusive consultative process aiming at setting-up a "Biosafety Public Awareness and Participation Plan" guided by the Framework for Communication Strategy as endorsed by Parties at COP 13; which would constitute a sustainable platform for building people's trust towards the NBF as a functioning system that guarantees biodiversity and people's health.

Summary of Findings and Conclusions supporting the Recommendation

Public awareness and Participation shortcomings were pointed out by virtually all stakeholders as a priority to be still addressed. The consultative process can fully rely on the National capabilities in place and be coupled with the strengthening of the National BCH. The process can rely on CAN institutional and human capabilities in promoting teamwork and networking.

(Ref: Conclusions § 145, 149; Sustainability § 134, 135; Findings § 76 (5.4.1), § 100-104 (5.4.2))

Recommendation 2

To GEF and UN Environment, regarding the discrepancies in Project Cycle (Programming) with focus on Project Planning and Design in the context of results-based management (RBM) approach.

The Evaluation recommends working on the harmonization of the requirements at the design, implementation and evaluation stages. In particular, to ensure the consistency between the Project Document / ProDoc and the template for the "assessment of the Project Design Quality"

Summary of Findings and Conclusions supporting the Recommendation

At the Project design stage, the requirements set in the template for the "assessment of the Project Design Quality" were largely ignored, fact that led to modest results in terms of Project design that impacted negatively on the implementation and evaluation stages of the Project.

(Ref: Conclusions § 149; Sections 5.2, Quality of Project Design; 5.7, Monitoring and Reporting).

Recommendation 3

To GEF and UN Environment, particularly UN Environment Evaluation Office (EO), regarding Monitoring and Evaluation (M&E) in the context of results-based management (RBM) approach.

The Evaluation recommends working on and investing resources for effectively and fully integrate Monitoring and Evaluation (M&E) requirements in the whole Project Cycle. More specifically:

- At the design / formulation stage (ex-ante), to ensure the validation of the M&E system of each project, with focus on SMART and verifiable indicators.
- At implementation stage, to promote capacity building (through workshops and coaching) on Project Cycle with focus on M&E, including the soft skills of the human resources involved in the project management and implementation, at all levels.
- To ensure the Projects' budget adequacy to the requirements of an effective monitoring and evaluation delivery, including capacity building.

Summary of Findings and Conclusions supporting the Recommendation

Relevant gaps in the monitoring and evaluation (M&E) system limit an evidence-based judgement on the Project's progress towards the achievement of its objectives. The M&E oversight is UN Environment major responsibility as Implementing Agency.

(Ref: Conclusions § 150; Chapter 4, Theory of Change; Chapter 5.2, Quality of Project Design; 5.4.2 Achievement of Outcomes § 82, 84; 5.7, Monitoring and Reporting § 119, 122, 123, 124, 130).

Recommendation 4

To GEF and UN Environment, regarding Human Rights and Gender Equality (HR&GE) mainstreaming, in compliance with the UN Programme for Reform (A/51/950, 14 July 1997), the UN Development Group Human Rights Mainstreaming Mechanism (UNDG-HRM), the UN Beijing Platform for Action from the Fourth United Nations World Conference on Women in Beijing in 1995, the UN system-wide policy on gender equality and the empowerment of women, the UN strategy on gender mainstreaming as well as the UN Evaluation Group (UNEG) guidance document on "Integrating Human Rights and Gender Equality in Evaluations", 2014.

The Evaluation recommends working on and investing resources, including appropriate Project budget, for effectively and fully mainstreaming Human Rights and Gender Equality (HR & GE) into the whole Project Cycle.

Summary of Findings and Conclusions supporting the Recommendation

Human Rights and Gender mainstreaming is compulsory to the UN programming (see above). The Project was Human Rights and Gender Equality blind (HR & GE) (See Chapter 3.3 Stakeholders, 5.2 Project Design, 5.7 Monitoring and reporting, and Chapter 5.8.1, Socio-political sustainability). Stakeholders are not classified along the key feature of "Duty-bearers" and / or "Rights'-holders". Possible vulnerable groups and local communities remained at the margins of the Project. Data collection methods and tools were not adapted to integrate HR & GE dimensions as well as Project's diversified impact on different stakeholders.

(Ref: Conclusions §149; Stakeholders § 34, 35; Project design § 68; Monitoring and reporting § 120; Sustainability § 135)

Annexes

1. Response to stakeholder comments received but not (fully) accepted by the evaluators
2. Evaluation TORs (without annexes)
3. Evaluation itinerary, containing the names of locations visited and the names (or functions) and of people met/interviewed. *(A list of names and contact details of all respondents should be given to the Evaluation Manager for dissemination of the report to stakeholders, but contact details should not appear in the report, which is publicly disclosed on the EOU website).*
4. Summary of co-finance information and a statement of project expenditure by activity
5. Evaluation Bulletin: A short (2-page) and simple presentation of evaluation findings and lessons to support the dissemination of learning to a wide range of audiences. (Samples and a template can be provided by the EOU)
6. Any other communication and outreach tools used to disseminate results (e.g. power point presentations, charts, graphs, videos, case studies, etc.)
7. List of documents consulted
8. Brief CVs of the consultants

Annex I. Response to stakeholder comments received but not (fully) accepted by the evaluators

<p>The evaluator acknowledges the feedback provided by the stakeholders at country level and by the UN Environment Task Manager responsible for the Project.</p> <p>The Evaluator wants to express her thankfulness for the feedback provided (inputs, comments, critics) that helped bettering the Final Report and she wants to ensure that even the comments that were not accepted, and consequently addressed here below, are highly valuable to the knowledge building process. Actually, these comments led to further critical thinking, analysis and structuring on challenging sectors of action. In this process, the oversight of the UN Environment, Evaluation Office, and particularly of Pauline Marima, Evaluation Officer, was outstanding.</p> <p>The evaluation shares stakeholders' concerns and wants to ensure that a lot of efforts were put, also during the country-visit, to find the right balance and reach a common understanding on the objective criteria against which a constructive judgement could be reached. (see Sections 2.1 and 2.2). The evaluation is also aware of the sensitivities that any assessment evolves, also reason for which a participatory approach was adopted and successfully implemented (see, inter alia, Lesson four on "Participatory approach and teamworking are instrumental to a learning-building evaluation").</p>		
Stakeholders' Comments	Evaluation Independent Consultant Response	UN Environment Evaluation Office Response
Comments of Alex Owusu-Biney – Task Manager (TM)		
Comment 1 overall comment		
<p>Another key issue is that these projects are under the GEF Strategy on Implementation of the Cartagena Protocol on Biosafety so the primary guidance in the design and execution of such projects is per guidance through the GEF Strategy and Guidance from COP-MOPs or Convention Processes through Strategies and Action plans and may not always fit directly into UN programming. The project is not a Human Rights based approach project but speaks directly to Convention and GEF strategic guidance.</p>	<ul style="list-style-type: none"> • The evaluation shares the TM concerns. We believe that the general considerations above as well as the evaluation's ToRs constitute an overall, positive response to such concerns. • Considering the relevance of the subject addressed by the TM comment, the response is two-fold, i.e. a- explain why the evaluation did express judgement in relation to the subject and b- put the subject into perspective (knowledge-building). • The evaluation recognises the fact that HR&GE language is not used in CPB or in relevant COP-MOPs and GEF-4. • Human Rights and Gender Equality mainstreaming (HRs&GE) is compulsory to the UN programming (see Recommendation 4). • The UNEG / UN Evaluation Group provides a guidance document on "Integrating Human Rights and Gender Equality in Evaluations", 2014, explaining "why" and "how" HR&GE is addressed in evaluation. GEF is UNEG member. 	

	<ul style="list-style-type: none"> • The Evaluation is requested to assess the Project Design also against Human Rights criteria as well as HRs in relation to sustainable development (question 6 of the Completed assessment of the Project Design Quality). • The UN Environment tools on “Stakeholder Analysis in the Evaluation Process”, Annex to ToRs, introduce Human Rights language (distinguishing between “rights’ holders” and “duty bearers”). • UN Environment, under the Environmental Governance, promotes the “UN Environmental Rights Initiative”, directly related to 8 Sustainable Development Goals (SDGs), including SDG 15, to which Biodiversity is directly related. UN Environmental Rights Initiative “represents the next phase of UN Environment’s work on human rights and the environment. The Initiative will bring environmental protection nearer to the people by helping them to better understand their rights and how to defend them; by working with media to improve coverage of rights issues; by calling on the private sector to move beyond a culture of compliance to one where environmental rights are championed; and by assisting governments to implement environmental rights obligations”. https://www.unenvironment.org/news-and-stories/video/uns-environmental-rights-initiative • GEF fully aligns with Sustainable Development Goals (SDGs) (see annex VI of this report, “The GEF and the Sustainable Development Goals”). Under Biodiversity, GEF identifies its contribution to SDG 15 (life on land) and with “additional impact” to other five SDGs (1- No Poverty, 2- Zero Hunger, 5- Gender Equality, 8- Decent Work and Economic Growth, 16- Peace, Justice, and strong Institutions), all corresponding to fundamental rights as spelled out in the Bill of Human Rights http://www.ohchr.org/Documents/Publications/FactSheet2Rev.1en.pdf . Although, this does not imply any “direct GEF strategic guidance”, stricto sensu, linking SDGs to Human Rights, we refer to it because it is a clear statement in terms of vision, which is progressively translated in Strategic guidance (e.g. this is already the case of Gender mainstreaming – See below). The Office of the United Nations High Commissioner for Human Rights (OHCHR) highlights the links between SDGs and HRs, ensuring SDGs implementation based on Human Rights. We also note the nomination of the Special Rapporteur on Human Rights and Environment, a milestone to the recognition of the Environmental Rights as Human Rights (the so-called “third generation” Human Rights). • Regarding Projects, HR&GE mainstreaming generally refers to those Projects that may not directly be HRs&GE related, therefore, in these 	
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<p>Issues of gender mainstreaming came up way after these projects and also we have to note that building capacity on biosafety is skills based and in some cases gender neutral. You do not have to be a man or woman to build capacity on risk assessment or detection of GMOs as to having the molecular biology or biochemistry or relevant biotechnology skills etc.</p>	<p>cases mainstreaming is used. Domains of action totally neutral to HRs and to Gender are very rare.</p> <ul style="list-style-type: none"> • HRs mainstreaming may imply few key and simple elements, starting by explicit reference to Human Rights and identifying “rights’ holders” and “duty bearers”. For instance, CPB takes into account risks to human health, which is enshrined in Human Rights International Law (treaties) and for which the State bears responsibility and so, the Public sector is considered no just service-provider but also duty bearer. The Legislator, the Executive Power (including Ministries and Public Service providers) and the Judiciary are duty-bearers. • More specifically, the CPB is, on one hand, hard International Law on environmental rights (including clear reference also to the right to health) and, on the other, through the GEF-UNEP Projects, promotes the progressive development of Environmental Law at National level through the NBF (regulatory regime). As also referred in “UN Environmental Rights Initiative”, Environmental Law (International and National) is among the most prominent instruments in environmental rights. • On Gender Equality (GE) we note that it is not GEF-4 (to which the Project is anchored) but GEF-6 that gives strategic guidance for GE mainstreaming implementation as the TM mentions. (See also, GEF, Gender Equality Action Plan, 2015). • The TM affirmation on “gender neutral” domain of action is not, to the evaluation’s knowledge, evidence based. Additionally, in this affirmation the scope of the NBF is narrowed. • The evaluation recognises that Gender Equality (GE) mainstreaming in biosafety remains normative and theoretical as long as the biosafety Projects do not earmark budget for the purpose in order to build up experience. Empirical work on mainstreaming Gender Equality in biosafety is extremely modest (only few references from IUCN). However, case-studies on the key role of women in food safety and food security as well as the gender differentiation in the case of “hybrid seeds” provide empirical evidence of the need to thoroughly look at gender differentiation and its possible impact in biosafety and biotechnology promotion. Even for the case of LMOs introduction just for feed and food (as in Turkey) we note that for instance, decisions on household nutrition are mostly taken by women. • The Socio-economic considerations (article 26 of the CPB) as well as article 23 (Public Awareness and Participation) may fit to the purpose. 	
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	<ul style="list-style-type: none"> • The evaluation notes that the Gender approach is distinct in that it focuses on women and men and not on women in isolation. Gender is a socially constructed definition of women and men and is determined by the conception of tasks, functions and roles attributed to women and men. Gender roles and relations change, often quite rapidly, as a result of social, economic and technological trends. (Wijk and Francis, 1999). • In relation to GE mainstreaming in this Project, see also below comment 2 response. In relation to the labs and risk assessment reference of TM, § 36 (Section 3.3, Stakeholders) of the report also brings some contribution. 	
Comment 2	Section 3.3, Stakeholders	
(§ 35) The Evaluator should take into consideration the fact that Turkey is an Islamic Republic and like others issues of men and women are gradually being positioned for initial thinking guided by religious sensitivities	<ul style="list-style-type: none"> • Turkey is a parliamentary representative republic established in 1923 by Mustafa Kemal Atatürk, based on secular, democratic, and pluralistic principles. Since 1934, women's suffrage is achieved, i.e. well before in countries as, for instance, France, Italy, and Belgium. • Nevertheless, the Gender Equality (GE) approach also involves cultural dimensions that may challenge its smooth implementation. On the other hand, lack of acquaintance with the GE approach is also a main challenge. For instance, during the country-visit, to the opinion of women stakeholders (Experts of the two Scientific Committees), at first, Gender Equality considerations appeared out of place because "in Turkey, women are not discriminated because of their gender". After shortly introducing the issue, a certain shifting of perceptions was noted, admitting that GE approach could present some interest, for instance, under Socio-Economic Considerations in case of "environmental release / production of GMOs". 	
Comment 3	Section 3.6, Project financing, and Section 5.5, Financial Management, table six, financial management table	
(§ 44) This cannot be blamed on the project as the UNEP Reporting does not report by the Project Component but the UNEP Budget lines/Component. By the GEF approval, projects are internalised according to the institutional processes of reporting.	<ul style="list-style-type: none"> • In the Terms of Reference (ToRs) of the Evaluation (Annex II of the Final Report), Chapter 5, Project Cost and Financing, the Project budget is given by component (GEF requirements). • The Evaluation ToRs, (Chapter 10, Evaluation Criteria, Section E, Financial Management) require that "This expenditure will be reported, where possible, at output level and will be compared with the approved budget" • In the ProDoc, Appendix 1&2, Budget, one may find the budget approved in two breakdown formats, i.e. one according to UNEP format (by 	

<p>(Rfr: table six, financial management table)</p> <p>Guided by UNEP Reporting obligations, the UNEP Biosafety team is developing an Anubis reporting tool which will allow the information provided to be captured also as component based expenditure reporting. This will be developed in future, the Anubis tool was developed guided by UNEP financial reporting obligations</p>	<p>budget lines) and one according to GEF format (by components / activities).</p> <ul style="list-style-type: none"> • In Appendix 11 of the ToRs, ("Guidance on the Structure of the Main Evaluation Report", Section F, Project financing) completed tables of: (a) budget at design and expenditure by components are required. The same Appendix of the ToRs foresees Annex 4 to the final evaluation report, i.e. "Summary of co-finance information and a statement of project expenditure by activity". • Complying with the ToRs requirements, under Section 3.6 and 5.5, the Evaluation just reported the facts without elaborating further. The issue is concisely discussed in Section 5.7.2 (Monitoring implementation) § 122 and 124, considering that "Monitoring of Project Expenditures by Project's Component (Outcomes), is a valuable steering tool and an indicator for monitoring the progress of the Project towards its expected Outcomes". • We consider that all elements above referred, align with the second comment / information of the TM. 	
<p>Comment 4 Chapter 4, Theory of Change (TOC), Diagram 1, Reconstructed TOC from Project Outputs to Outcome</p>		
<p>Please check Drivers on outcomes bullet no. 3 and 4 are the same?</p>	<p>The two drivers are distinct.</p> <p>Driver 3- (coordination role of the two CNAs) refers to the coordinating role that the two CNAs play among the several stakeholders whereas Driver 4- (functional and harmonious coordination between the two NCAs) refers to the necessary coordination between these two National Coordinating Authorities.</p>	
<p>Comment 5 Section 5.2, Quality of Project Design</p>		
<p>(§ 68) This assumption to me is flawed. The projects are speaking to the GEF Strategy on Implementation of the Biosafety Protocol and its strategy. The law and the approach on Public Awareness and Participation is guided by articles 20 – 23 which were drafted based on the principles of human rights based and participatory approaches guided by the Rio Declarations or principles</p>	<ul style="list-style-type: none"> • This is not an assumption but, an evidence-based judgement against the 41 questions (and 48 criteria) foreseen by the "Template for the assessment of the Project Design Quality (PDQ)", of which five (5) criteria directly refer to Human Rights and Gender Equality as well as to stakeholders' analysis, which is attributed a specific rate-weighting of 1.2 (in this assessment tool, rate-weighting goes from 0.4 to 1.6). • The evaluator's intention in § 68 was two-fold, i.e. to make a clear statement on the overall quality of the Project Design and, on the other hand, to explain why, despite the overall good quality, the rating was only Moderately Satisfactory. (See also Recommendation 2 and 4). 	

	<ul style="list-style-type: none"> • It is also worth noting that Project's remarkably clear design (see § 65) permits a more structural analysis that enables knowledge-building also through gaps' identification. • The rationale proposed by the TM, regarding Rio Declaration, puts CPB into perspective. Actually, the whole UN machinery, including International Law, is Human rights (HRs) based. Consequently, all institutional arrangements and tools deployed in this context are HRs embedded, including Programmes, Projects and specific funding tools (e.g. GEF) yet, this alone is not enough. At Project level, we have to assess if and to which extent a Project concretely contributes to the Promotion – Protection – Fulfilment of HRs generally and with focus on which specific rights (e.g. "environmental rights", property rights, health rights and so on). Therefore, HRs have to be explicit in the ProDoc, HRs' language has to be used (starting by identifying rights-bearers and duty-holders as well as the specific rights promoted through the Project) and possible earmarked activities identified (e.g. awareness raising training or campaigns on the relevance of HRs for the activities and Objectives of the Project). All these elements are totally missing in the ProDoc. • Indeed, Rio Declaration is a milestone in the affirmation of the so-called third generation HRs, precisely, "environmental rights". Rio Declaration is non-binding. The two Rio Conventions as well as the CPB are binding. • Legal Instruments as International Treaties and Conventions (which are binding to the member states that ratify them) constitute the most advanced tools in the Human Rights and governance agenda. • More specifically, the CPB is not only hard International Law on environmental rights (also addressing the right to health) but, through the GEF-UNEP Projects, also promotes the progressive development of Environmental Law at National level through the NBF (pillar: regulatory regime). (See reference to "UN Environmental Rights Initiative"). • The CPB not only adheres to Rio Declaration as a whole, but also specifically implements Principle 15 of the Declaration (precautionary approach) as well as Principle 10 "Environmental issues are best handled with the participation of all....." through CPB articles 20 (Information Sharing and the Biosafety Clearing-House) and 23 (Public Awareness and Participation), as referred by the TM. 	
Comment 6 Section 5.4.2, Achievement of Direct Outcomes		
(§ 105) This overall rating is difficult to understand and seems flawed to me.. The	<ul style="list-style-type: none"> • The evaluation accepts the TM remark that the two first Direct Outcomes are "key" / sine qua non condition for achieving the 	

<p>Evaluator's narrative – Outcomes 1 – HS; 2 – HS; 3 – S and 4 – MS: the first two are key to achieving the objectives by setting the enabling environment, the third is a continuous process of learning by doing and even the fourth. Based on this the rating should be at least S not MS. This need to be clarified because the project is not just a public engagement project though it plays a key role just as the other three envisaged outcomes</p>	<p>objectives. Based on the “UNEP-GEF Toolkits for the Development of National Biosafety Frameworks” (see Annex VI, Documents Consulted), the evaluation recognises that the “regulatory regime forms the central pillar of the NBF”, yet, it has not any further normative or project-based grounds for assessing the Direct Outcomes’ performance with a differentiate coefficient of importance. All are important to attain intermediate states (See Chapter 4, Theory of Change).</p> <ul style="list-style-type: none"> • The Evaluation keeps its rating considering that: <ol style="list-style-type: none"> 1. The overall result (Moderately Satisfactory) does not correspond to the sum of the parties (for which rating is not compulsory) but, to the overall picture assessed against the criteria provided by the UN Evaluation Office (“Guidelines from the Evaluation Office to the Consultants, “Criterion Rating Description”, Updated November 2017, still in progress), as explained in the report under § 57, Chapter 5, Evaluation findings. Moderately Satisfactory rating corresponds to: “Those direct outcomes that are the most important to attain intermediate states, partially achieved”. Satisfactory rating corresponds to: “Those direct outcomes that are the most important to attain intermediate states, fully achieved”, which, as elaborated under Section 5.4.2, is not the case. 2. The scope of the evaluation is the performance of the Project and not the performance of the NBF of Turkey (See Section 6.1, Conclusions, the “four key strategic questions”). 3. The Biosafety Law and the two Regulations (Direct Outcome 1), were endorsed by the Turkish National Assembly even before the Project started. (See Section 5.4.2, Outcomes § 78 and 5.4.1, Outputs, § 72) 4. The evaluation was not challenged by the “process” feature of the Direct Outcomes. The evaluability challenge, in the sense of the capability to attribute results to a Project, generally unfolds along two key issues, i.e. an agreed concept (e.g. Theory of Change and complete Logical Framework that provide the interpretative criteria) and evidence. Evidence is selectively collected, largely, though not exclusively, based on the indicators identified in a Project. Indicators are the most important criteria against which an objective judgement is attempted. Those indicators were missing at Outcome level. See more on that in § 82, Section 5.4.2. 5. As elaborated under § 79, § 82, and § 119, a fully coherent judgement was challenged either by the gaps in the definition of the results or the absence of indicators. As explained under § 127 and § 129, the national stakeholders took awareness of such gaps and partially addressed them during the country-visit. With the facilitation of the evaluator, 	
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	stakeholders identified, on the spot, some possible Outcome indicators and systematised evidence (e.g. statistics on the decision-making process or number of analysis in the labs). However, at the evaluation stage, further structuring proved being over-ambitious. National stakeholders tried to handle the issue even after the country-visit, but, everybody, apparently, came into the conclusion that this is a process deserving earmarked efforts (See recommendation 3, To GEF and UN Environment, particularly UN Environment Evaluation Office (EO), regarding Monitoring and Evaluation (M&E) in the context of results-based management (RBM) approach).	
Comment 7 Section 5.4.2, Achievement of Direct Outcomes		
(§ 93) The law formulation was guided by the current EU positioning as Turkey is setting up a system that allows for potential future integration in the EU and also for trade with its largest trading block. So trade and political focus was key in the structuring of the report at the time	<ul style="list-style-type: none"> During the country visit did not emerge that the Biosafety Law is strict because of the European perspective of the country. So, the Evaluator is not sure about the adherence of this comment to the country's current debate. The evaluation tried to capture / give voice to the national stakeholders' concerns that were recurrently and clearly expressed. Yet, the Evaluation did not attempt any root-causes analysis of the state of play as outlined in § 93. That was out of the scope of the evaluation, which focused on assessing Project's effective implementation and on providing an informed, evidence-based judgement on four key strategic questions (see § 146, Section 6.1, Conclusions). The evaluation did extensively hear about the relevance of EFSA (European Food Safety Authority) and the way that EFSA tools may underpin decision-making (with focus on Risk Assessment). It is to be noticed that the evaluation held a specific meeting with an Expert of Ministry for EU Affairs (Mr. Mete Cevik). Additionally, as noted in § 143 (Section 6.1, Conclusions), relevant stakeholders focused on Turkey's role in the global food market (its comparative advantages). Turkey, in coordination / negotiation with its commercial partners, is still considering which the best option to foster, i.e. organic or genetically modified. 	
Comments from Turkey Stakeholders		
Birgül GÜNER - Project assistant		
The evaluation report investigated Support for the Implementation of the National Biosafety Framework of the Republic of Turkey Project at various stages: the project design and concept, delivery, outputs and outcomes. The report have been made general	<ul style="list-style-type: none"> The evaluator acknowledges the feedback of the National stakeholders as well as their valuable and active collaboration during the whole evaluation cycle, including the country-visit. The evaluator acknowledges the receipt of the feedback on the matrix corresponding to the Table 7, Evaluation Criteria and Ratings, of the 	

<p>statements of the success of the project in terms of the evaluation criteria (relevance, effectiveness, efficiency and sustainability and, where feasible, impact), it has been provided a more detailed analysis of where progress was made and how, and what were the key factors to such progress or lack of it. This is an important approach for the evaluation report and the selected approach could identify and characterize targeted improvements with Support for the Implementation of the National Biosafety Framework of the Republic of Turkey project.</p> <p>TAGEM welcome the findings and recommendations as valuable guidance to the evaluate of the Support for the Implementation of the National Biosafety Framework of the Republic of Turkey project, and share of annex table for the details.</p>	<p>report (Section 6.1, Conclusions). In this matrix, TAGEM fully accepts 23 ratings and partially 7.</p> <ul style="list-style-type: none"> • However, this feedback cannot change the conclusion reached by the evaluation. Evaluations have to be evidence-based. To consider any rating revision, the evaluator would need to be provided a reasoned feedback either on the criteria, on which partially divergent views raise, or in terms of supporting evidence. • The evaluations “should not be undertaken with the motive of appraisal, preparation, or justification for a follow-up phase” (GEF Guidelines for GEF Agencies in Conducting Terminal Evaluations, Evaluation Document No. 3, 2008). 	
<p>Remziye YILMAZ - Doç. Dr. Hacettepe Universitesi</p>		
<p>I read the draft terminal evaluation report for the UN Environment project: “Implementation of the National Biosafety Framework for Turkey”.</p> <p>I sent my comments and response for Birgul Guner from TAGEM.</p> <p>She will send you an official response for the report and I totally agree with her report.</p> <p>I thank you to share us this valuable report. I look forward next project.</p>		
<p>Prof. Dr. Hakan YARDIMCI - Ankara University Former Chair of the Biosafety Board</p> <p>I have read the draft terminal evaluation report for the UN Environment project:</p>		

<p>“Implementation of the National Biosafety Framework for Turkey, and I am convinced that it is objective and detailed. As a result, I think that it would be appropriate to make another project complementary to the deficiencies in this project and to reach new information in the future. I showed a spelling error about my email address (p.76) in the mail attachment.</p> <p>I would like to thank Emilia Venetsanou and her colleagues for their hard work in preparing the report.</p>		
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Annex II. Terms Of Reference for the Evaluation

Terminal Evaluation of the UN Environment/Global Environment Facility projects:

“Implementation of National Biosafety Framework for Turkey”

And

“Capacity Building for Implementation of the Cartagena Protocol on Biosafety in India – Phase II”

SECTION 1: PROJECT BACKGROUND AND OVERVIEW

Project General Information

Table 1. Project summary

GEF Strategic Objective:	SP 6 – Biosafety/SO3	Focal Area(s):	Biosafety
GEF project ID:	4067 (Turkey) 3751 (India)	GEF OP#	BS
UN Environment approval date:	January, 2011 (Turkey) May 2012 (India)	UN Environment Sub-programme:	Environmental Governance
GEF approval date:	January 2011 (Turkey) August 2011 (India)	Project type:	Medium Size Project (Turkey) Full Size Project (India)
Expected start date:	September 2011 (Turkey) September 2011 (India)	Actual start date:	September 2013 (Turkey) May 2012 (India)
Planned completion date:	August 2014 (Turkey) August 2015 (India)	Actual completion date:	August 2017 (Turkey) July 2017 (India)
Planned project budget at approval:	US\$ 1,292,650 (Turkey) US\$ 8,727,273 (India)	Actual total expenditures reported as of April 2016:	US\$ 532,385.90 (Turkey)
GEF grant allocation:	US\$ 542,650 (Turkey) US\$ 2,727,273 (India)	GEF grant expenditures reported as of [date]:	US\$ 175,813.20 (Turkey as of 30 June 2015) US\$ 1,487,953.51.00 (India as of 30 June 2016)
Expected Medium-Size Project co-financing:-	US\$ 750,000 (Turkey) US\$ 6,000,000.00 (India)	Secured Medium-Size Project co-financing:	US\$ 291.867,00 (Turkey) US\$ 5,761,994.00 (India)
First disbursement:	October 2011 (Turkey)	Date of financial closure:	-
No. of revisions:	5 (Turkey) 4 (India)	Date of last revision:	January 2017 (Turkey) January 2016 (India)
No. of Steering Committee meetings:		Date of last Steering Committee meeting:	December, 2014 (Turkey) January 2017 (India)
Mid-term Review/ Evaluation (planned date):	June, 2012 (Turkey) September 2015 (India)	Mid-term Review/ Evaluation (actual date):	N/A
Terminal Evaluation (planned date):	2017	Terminal Evaluation (actual date):	2017
Coverage - Country(ies):	Turkey India	Coverage - Region(s):	Europe and Asia

- **Project rationale**

Turkey

Turkey is one of the richest countries in endemic plants in its geographical zone, with 34 % (3,150) of the species in Turkey being endemic. This high rate of endemism makes Turkey interesting in terms of seed plants and maintains its character as a centre of attraction in this regard. The number of seed plant species identified in Turkey is currently about 9,200 and the number of species and sub-species taxa has reached 11,000. This number increases every day with the identification of new species. As a country having genetic centres of origin and diversity of crops, adverse effects of Living Modified Organisms constitutes substantial threat on conservation and sustainable use of biological diversity in Turkey. Root causes of the threat arise from the insufficient legislative, administrative, institutional and technical capacity to regulate introduction of Living Modified Organisms and to prevent unintentional and/or illegal transboundary movements of them as well as low level of public awareness and participation in biosafety issues. Unregulated introduction of products of modern biotechnology could lead to loss of wild and agricultural biodiversity in Turkey and thus an operational biosafety framework with adequate capacity is required to ensure that the potential benefits of modern biotechnology can be captured in a fully legal and transparent manner.

Turkey has been a Party to the Convention on Biological Diversity since 14 May 1998 and participant of the process of preparations of the Cartagena Protocol on Biosafety since 1998. Turkey also participated to the UN Environment/GEF project on Development of National Biosafety Frameworks between 2002 and 2005. The main components of the framework (comprising of biosafety policy, regulatory regime, monitoring and enforcement, public awareness, education and participation) were reflected on the draft Biosafety Law, which was adopted by the Turkish General National Assembly in March 2010 and entered into force in September 2010.

The National Biosafety Framework (NBF) of Turkey and its Law on Biosafety provide a political and legislative baseline for biosafety. However there were gaps in terms of technical capacity and human resources to achieve a functional system. Institutional gaps also existed for the identification and detection of Living Modified Organisms, implementation of standard methods, and verification of results. The national biosafety Clearing-House Mechanism was also not operational due to technical and financial constraints. Capacities of two food control laboratories had been built up to be able to detect Living Modified Organisms, but still there wasn't sufficient capacity to manage both intentional and unintentional/illegal introduction of Living Modified Organisms. The awareness of the public about Living Modified Organisms had been substantially raised, but disinformation became an important problem due to some inappropriate interventions by programmes of some Non-Governmental Organisations, private sector and the media.

In order to safeguard biodiversity, countries require management systems and frameworks that have the capacity to detect, exclude, eradicate, control and effectively manage introduced organisms that pose a risk to biodiversity. In addition, to be able to implement their obligations, Parties to the Cartagena Protocol on Biosafety need appropriate institutional mechanisms and infrastructure, well-trained human resources, adequate funding as well as easy access to relevant information. Capacity building is therefore a key prerequisite for the effective implementation of the Cartagena Protocol on Biosafety (CPB).

This project builds on UN Environment's portfolio of enabling activities in over 123 countries on capacity building for the implementation of the CPB through the development and implementation of National Biosafety Frameworks. This portfolio has already produced relevant results, generated lessons learned and best practices being used. In this respect, the project will benefit from UN Environment's experience and expertise to develop a fully operational NBF in Turkey, where best practices and lessons learned will add to those being acquired through the eight demonstration projects already being implemented in Turkey.

India

India second worldwide in farm output and a vast majority of its people depend directly on agriculture and forestry for food security and livelihood. In the last decade, per unit productivity in food grains has plateaued and annual per capita availability is on the decline thereby requiring an urgent need for new technological interventions. India has made rapid progress in biotechnology research and development. The impact of the release of living modified organisms (LMOs) on the sustainable use of biodiversity and human health however continue to be a primary concern among many.

In terms of biosafety law and policies, India was one of the first in the developing world to enact a biosafety regulation in as early as 1989, 3 years before the Convention on Biological Diversity (CBD) was adopted in 1992. The Government of India ratified the Cartagena Protocol on Biosafety (CPB) in 2003 and by 2007, a constellation of legislations cognate to biosafety regulations were developed. Nevertheless, there is an urgent need to strengthen the regulatory procedures and enforcement mechanisms with regard to transboundary movement of LMOs, in view of advancements in crop biotechnology at the national and global level.

The Phase-II Capacity Building Project on Biosafety will build on the foundations of a previous project in India by The GEF and World Bank. It aims to strengthen the biosafety management system in India with special emphasis on Risk Assessment and Management, Handling, Transport, Packaging and Identification of LMOs, Socio Economic

Considerations and Public awareness, to ensure adequate protection of human health and biodiversity from potential harm arising from all LMO related activities.

Since India already has several LMOs which are close to commercialization, India will soon be both an exporter and an importer of LMOs. The GOI needs to ensure that biotechnology R&D is guided by a process of prudent decision making that safeguards both biodiversity and human health with adherence to the highest ethical standards.

The project will assist India, to build capacity to strengthen the biosafety management in the country. Strengthening the biosafety management system will be very important to ensure adequate protection of human health and biodiversity from potential harm arising from all LMO related activities, and at the same time, allow the country to derive maximum benefits from biotechnology through increasing crop yields with more “green” practices such as the reduction of pesticide use, less irrigation, less desertification and fewer chemicals to the soil.

○ Project objectives and components

Turkey

Turkey has globally important components of biological diversity and genetic centres of origin and diversity of genetic resources important for food and agriculture. The overall **goal** (global environmental benefit) of the project is *the protection of biological diversity against possible adverse effects of Living Modified Organisms (LMOs) by means of ensuring safe transfer, handling and use, and transboundary movement of LMOs*.

To achieve **overall objective** (development objective), the project aims on building capacity in Turkey for effective and full implementation of National Biosafety Framework (NBF) that is in line with national development priorities, Cartagena Protocol and other international obligations.

The **specific objectives** of the project in Turkey are as follows:

- (i) Identification of gaps and need for regional harmonization and consistency where there is potential for reciprocal (transboundary) movement as well as analysis of stakeholders who will take part on implementation of NBF.
- (ii) Putting in effects the administrative and legislative system of biosafety to ensure protection of biological diversity and human health during the development, handling, transport, use, transfer and release of any LMOs.
- (iii) Building institutional and human resource capacity for handling of requests for authorization, decision-making, risk assessment and risk management of LMOs.
- (iv) Building institutional and human resource capacity for effective monitoring, surveillance and inspection of LMOs to ensure compliance with consents and to prevent illegal and/or accidental releases and transboundary movements of LMOs.
- (v) Raising awareness of public on issues with regard to safe use of LMOs and building institutional and human resource capacity to ensure their participation into implementation of NBF including decision-making process on authorization of LMOs.

These project objectives were expected to be achieved through five output clusters (project components) with corresponding activities and outcomes, as summarized in Table 2 below. (A detailed Results Framework is available in Annex 14).

Table 2: Summary of Project's Results Framework - Turkey

Project Component	Expected Outcome
1 Stocktaking on biosafety	Outcome 1: Stakeholder and gap analysis with regard to implementation of NBF of Turkey prepared
2 Regulatory biosafety regime	Outcome 2: Regulatory biosafety regime in place and legally mandated
3 System for handling of requests, risk assessment, decision-making and risk management of LMOs	Outcome 3: Functional system for handling of requests, risk assessment, decision-making and risk management of LMOs established
4 Monitoring and inspection system for LMOs	Outcome 4: Monitoring and inspection system for LMOs established
5 Public awareness and participation for biosafety	Outcome 5: Functional system for public awareness and participation established for biosafety

India

The overarching **goal** of this project is to assist the Government of India, as Party to the Cartagena Protocol on Biosafety (CPB), to build capacity to implement the CPB through activities at the national, sub regional and regional levels.

The **overall objective** is to strengthen the biosafety management system in India with special emphasis on four key: Risk Assessment and Management; Socio Economic Considerations; Handling, Transport, Packaging and Identification of LMOs in agriculture; and Public Awareness.

The project's activities were grouped under 8 components: Component 1 involves a stocktaking assessment to assist in priority setting of project activities and ensure that all project outcomes are achieved; Component 2 aims to strengthen the legal and regulatory framework; Component 3 covers the enhancement of institutional capacities; Component 4 is designed to develop human resources; and Component 5 deals with raising public awareness.

Project management and Project monitoring and evaluation form Component 6 and 7; Promotion of regional cooperation, networking and sharing of experience is covered under Component 8.

Components 1-5, with corresponding objectives and expected outcomes, are summarized in Table 2 below. (A detailed Results Framework is available in Annex 14).

Table 3: Summary of Project's Results Framework - India

Project Component	Specific Objectives	Expected Outcomes
Component 1: Stocktaking Assessment	To assist India to update its information on status and capacity for biosafety management, including capacity in Risk Assessment and Risk Management, documentation and identification for compliance.	Outcome 1: Updated information is consolidated to guide the planning of specific activities under this project
Component 2: Strengthening Regulatory and Legal Framework	To assist India to strengthen biosafety regulatory framework that is consistent with CPB.	Outcome 2.1: A legal and regulatory framework that is consistent with the CPB, is strengthened to permit effective evaluation, management and monitoring of LMO(s) risk Outcome 2.2: Socio-economic assessment are considered Outcome 2.3: A national system is established for handling, transport, packaging and identification of LMOs, consistent with the requirements under Article 7 and Article 18 of the CPB.
Component 3: Strengthening Institutional Capacity	To assist India to establish a network of laboratories for detection of LMOs.	Outcome 3: Institutions and staff capacity is enhanced for LMO detection
Component 4: Human Resource Development	To assist India in enhancing human resource for RA, RM, LMO detection and enforcement.	Outcome 4. 1: Human resource is developed for strategic areas such risk evaluation. Outcome 4.2: Enforcement mechanism at the ports of entry is strengthened with trained staff.
Component 5: Information Dissemination for Enhancing Public Awareness	To assist India to establish and consolidate systems for public education, awareness, participation and access to biosafety information.	Outcome 5: Public awareness on biosafety issues, biosafety regulation and regional cooperation is enhanced

○ Executing Arrangements

Turkey

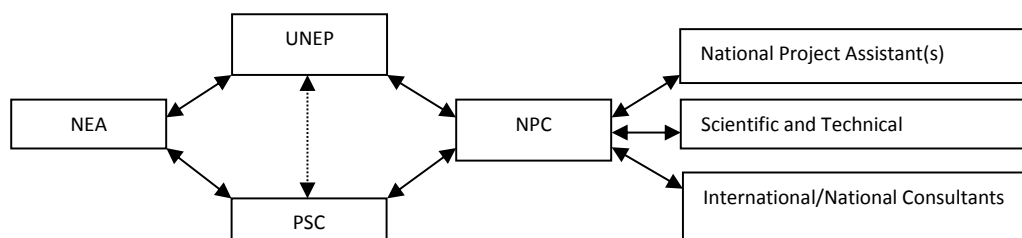
The project was implemented by UN Environment (**Implementing Agency**). The UN Environment unit responsible for project implementation was the Division of Environmental Policy Implementation (Law Division). The project was executed at the country level by the Ministry of Agriculture and Rural Affairs (MARA) which was also executing agency of National Biosafety Framework development project - the **National Executing Agency** (NEA). Those duties and responsibilities of the MARA

which concern biological diversity are performed by its central and provincial organizations through the General Directorate of Agricultural Research (GDAR), the General Directorate of Protection and Control (GDPC) and the General Directorate of Agricultural Production and Development (GDAPD), which are among its main service units.

A **National Coordinating Committee (NCC)** was established by the National Executing Agency to advise and guide the implementation of the National Biosafety Framework. This committee included representations of all government agencies with mandates relevant to the Cartagena Protocol on Biosafety as well as the private and public sectors. A **National Project Coordinator** was appointed by the National Executing Agency to be responsible for the overall coordination, management and supervision of all aspects of the National Project. The Project Coordinator reported to the **National Coordinating Committee** and UN Environment, and was expected to liaise closely with the chair and members of the National Coordinating Committee and National Executing Agency in order to coordinate the work plan for the National Project. The Project Coordinator was also responsible for all substantive, managerial and financial reports from the National Project, overall supervision for project staff, as well as guiding and supervising all other staff appointed for the execution of the various National Project components.

The departments, research institutes and laboratories of the MARA are main the beneficiaries of the project. Governmental institutions who also participated in project activities include: Ministry of Health, Ministry of Justice, Ministry of Industry and Trade, Undersecretary of State Planning Organization, Undersecretary of Foreign Trade, Undersecretary of Customs, Turkish Patent Institute, The Scientific and Technical Research Council of Turkey and Universities. Other key stakeholders of the project include NGOs acting on conservation and sustainable use of biodiversity and on consumer rights as well as the private sector. Figure 1 below shows the project's execution arrangements.

Figure 1: Decision making flowchart and organigram - Turkey



UNEP: UN Environment

NEA: National Executing Agency (Ministry of Agriculture and Rural Affairs, Turkey)

PSC: Project Steering Committee

NPC: National Project Coordinator

India

The project was implemented by UN Environment (**Implementing Agency**). The UN Environment unit responsible for project implementation was the Division of Environmental Policy Implementation (Law Division).

The project was executed at the country level by the Ministry of Environment and Forests (MoEF) - the **National Executing Agency (NEA)**. It is also the the national competent authority for the CPB. The Executing Agency worked on behalf of GOI to manage the project and took overall responsibility for the implementation of the project and achievements of its objectives. It would also provide the necessary scientific, technical, financial and administrative support to the project, working in close cooperation with relevant government agencies, the scientific community and other stakeholders.

A **National Steering Committee (NSC)** was established by the National Executing Agency to advise and guide the implementation of the project. This committee included representation from government agencies with mandates relevant to the Cartagena Protocol on Biosafety, as well as scientific experts, NGOs and a UNEP representative. The NSC would oversee the project progress through receipt of half-yearly progress reports and make recommendations to UNEP on the need to revise any aspects of the Results Framework or the M&E plan.

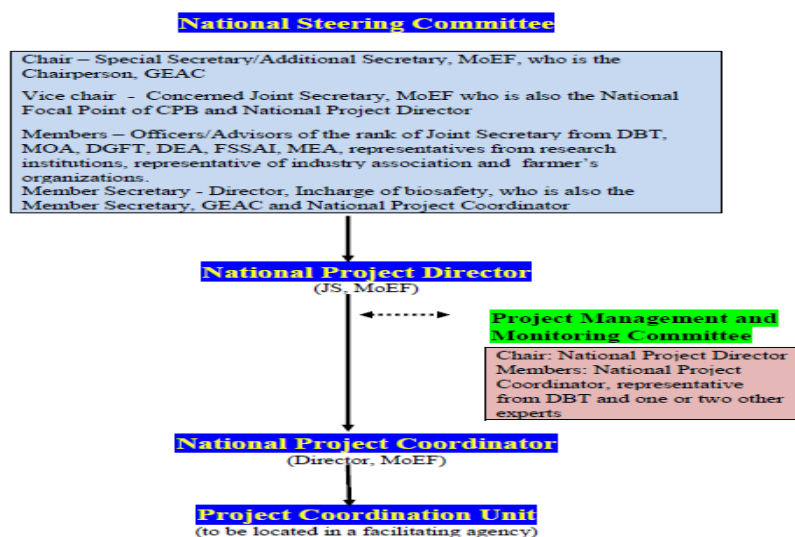
A **National Project Director (NPD)** appointed by the Executing Agency provided overall supervision of the project. The NPD was required to oversee the preparation of the annual Project Implementation Reports (PIRs), participate in the mid-term review and terminal evaluation, and at the conclusion of the project oversee the completion of the project closure procedures, including timely submission of all technical, financial and audit reports to UN Environment.

A **National Project Coordinator** also appointed by the National Executing Agency was responsible for the day to day coordination of project activities to ensure implementation of the project activities as set out in the project document. The

NPC was also responsible for the preparation of progress and financial reports of the project, as well as of the annual Project Implementation Report (PIR).

A **Project Management and Monitoring Committee** (PMMC) was constituted to provide technical support to the National Project Director and the National Project Coordinator. A **Project Coordination Unit** (PCU) provided the required operational and administrative and technical support for implementation of the project activities. Figure 2 below shows the project's execution arrangements

Figure 2 Decision Making Flow-chart and Organizational Chart - India



○ **Project Cost and Financing**

The project in **Turkey** falls under the medium-size project (MSP) category, with an overall project budget of **US\$1,292,650** that comprised of a GEF allocation of US\$542,650 and an expected counterpart funding from the government of Turkey of US\$ 550,000 in cash and US\$ 200,000 in-kind.

The project in **India** falls under the full-size project (FSP) category, with an overall project budget of **US\$ 8,727,273** comprising US\$ 2,727,273 from the GEF and an expected counterpart funding from the government of India of US\$900,000 in cash and US\$5,100,000 in kind, amounting to a total of US\$ 6,000,000.

Table 4. Estimated project budget by component (USD) - Turkey

Component	GEF	Co-Financing	Total
1 Stocktaking on biosafety	5,000	5,000	10,000
2 Regulatory biosafety regime	14,000	17,000	31,000
3 System for handling of requests, risk assessment, decision-making and risk management of LMOs	128,000	176,500	304,500
4 Monitoring and inspection system for LMOs	272,650	350,000	622,650
5 Public awareness and participation for biosafety	53,000	101,500	154,500
M&E	20,000	25,000	45,000
Project Management	50,000	75,000	125,000
TOTAL	542,650	750,000	1,292,650

Table 5. Estimated project budget by component (USD) - India

	Project (B)
GEF financing	2,727,273
Co-financing	6,000,000
Total	8,727,273

○ **Implementation Issues**

Turkey: Delays in implementation of some project components, especially the technical studies, have mainly been related to delays in receiving during the transition to UNOJA⁵⁹ funds from UN Environment. To counter the risks associated with these challenges, project extension was made to extend the technical duration of the project up to December 2016 to allow for review, finalisation, translation and publishing of guidelines on application procedures, legal issues, risk assessment, socio-economic assessment, emergency measures, traceability, control and inspection of LMOs and organisation of relevant meetings. Another project extension was granted to extend the project to end in August 2017 to allow for the completion of outstanding activities. In spite of these revisions to the project document and budget, the total cost of the project has remained unchanged.

India: The project did not experience any major setbacks. Most notable implementation issue was a delayed start of the by 1.5 years. The project has however progressed well and has completed most of the project activities with the help of project partners and the Project Coordination Unit (PCU). No-cost extensions were required to re-phase the budget and complete outstanding activities and outputs before closing the project, for example: state level training workshops; development of an E-Learning Module on ERA of GE Plants; establishment of an e-Monitoring mechanism; various reports from agencies under the 'Handling, Transport, Packaging and Identification' thrust area; finalization of the Risk Communication Strategy; and development and distribution of outreach materials developed under the project.

b. SECTION 2. OBJECTIVE AND SCOPE OF THE EVALUATION

○ **Key Evaluation principles**

Evaluation findings and judgements should be based on **sound evidence and analysis**, clearly documented in the evaluation report. Information will be triangulated (i.e. verified from different sources) as far as possible, and when verification is not possible, the single source will be mentioned (whilst anonymity is still protected). Analysis leading to evaluative judgements should always be clearly spelled out.

The "Why?" Question. As this is a terminal evaluation and similar interventions are envisaged for the future, particular attention should be given to learning from the experience. Therefore, the "Why?" question should be at the front of the consultants' minds all through the evaluation exercise and is supported by the use of a theory of change approach. This means that the consultants need to go beyond the assessment of "what" the project performance was, and make a serious effort to provide a deeper understanding of "why" the performance was as it was. This should provide the basis for the lessons that can be drawn from the project.

Baselines and counterfactuals. In attempting to attribute any outcomes and impacts to the project intervention, the evaluators should consider the difference between *what has happened with, and what would have happened without, the project*. This implies that there should be consideration of the baseline conditions, trends and counterfactuals in relation to the intended project outcomes and impacts. It also means that there should be plausible evidence to attribute such outcomes and impacts to the actions of the project. Sometimes, adequate information on baseline conditions, trends or counterfactuals is lacking. In such cases this should be clearly highlighted by the evaluators, along with any simplifying assumptions that were taken to enable the evaluator to make informed judgements about project performance.

Communicating evaluation results. A key aim of the evaluation is to encourage reflection and learning by UN Environment staff and key project stakeholders. The consultant should consider how reflection and learning can be promoted, both through the evaluation process and in the communication of evaluation findings and key lessons. Clear and concise writing is required on all evaluation deliverables. Draft and final versions of the main evaluation report will be shared with key stakeholders by the Evaluation Office. There may, however, be several intended audiences, each with different interests

⁵⁹ UN+MOJA is a complete re-working of the way the United Nations Secretariat manages its administration, in both business processes and Information Technology solutions. A new central administrative system, UMOJA replaces multiple and fragmented legacy systems such as IMIS, Mercury and Sun.

and needs regarding the report. The Evaluation Manager will plan with the consultant(s) which audiences to target and the easiest and clearest way to communicate the key evaluation findings and lessons to them. This may include some or all of the following; a webinar, conference calls with relevant stakeholders, the preparation of an evaluation brief or interactive presentation.

○ **Objective of the Evaluation**

In line with the UN Environment Evaluation Policy⁶⁰ and the UN Environment Programme Manual⁶¹, the Terminal Evaluation (TE) is undertaken at completion of the project to assess project performance (in terms of relevance, effectiveness and efficiency), and determine outcomes and impacts (actual and potential) stemming from the project, including their sustainability. The evaluation has two primary purposes: (i) to provide evidence of results to meet accountability requirements, and (ii) to promote operational improvement, learning and knowledge sharing through results and lessons learned among UN Environment and the project's main partners. Therefore, the evaluation will identify lessons of operational relevance for future project formulation and implementation [especially for the second phase of the project, if applicable].

○ **Key Strategic Questions**

In addition to the evaluation criteria outlined from para. 8 below, the evaluation will address the **strategic questions** listed below. These are questions of interest to UN Environment and to which the project is believed to be able to make a substantive contribution:

1. To what extent were these projects able to assist Turkey and India to establish and consolidate a fully **functional and responsive regulatory regime** that responds to their obligations under the Cartagena Protocol on Biosafety as well as their national needs for a viable and profitable National Biosafety Framework?
2. To what extent were these projects able to develop **institutional and technical capacity, awareness and participation** amongst the key actors to ensure that biosafety becomes part of their permanent action?
3. To what extent was the project able to assist Turkey and India establish and consolidate a **functional national monitoring system** for Biotechnology to follow up on the releases of Living Modified Organisms (LMOs) and their possible effects on the environment?
4. To what extent are the **outcome indicators verifiable**, and record progresses towards the achievement of the development objectives, as well as the obligations under the Cartagena Protocol?

○ **Evaluation Criteria**

All evaluation criteria will be rated on a six-point scale. Sections A-I below, outline the scope of the criteria and a link to a table for recording the ratings is provided in Annex 1). A weightings table will be provided in excel format (link provided in Annex 1) to support the determination of an overall project rating. The set of evaluation criteria are grouped in nine categories: (A) Strategic Relevance; (B) Quality of Project Design; (C) Nature of External Context; (D) Effectiveness, which comprises assessments of the achievement of outputs, achievement of outcomes and likelihood of impact; (E) Financial Management; (F) Efficiency; (G) Monitoring and Reporting; (H) Sustainability; and (I) Factors Affecting Project Performance. The evaluation consultant can propose other evaluation criteria as deemed appropriate. The following criteria apply to **each** project (i.e. **Turkey and India**)

A. Strategic Relevance

The evaluation will assess, in line with the OECD/DAC definition of relevance, *'the extent to which the activity is suited to the priorities and policies of the target group, recipient and donor'*. The evaluation will include an assessment of the project's relevance in relation to UN Environment's mandate and its alignment with UN Environment's policies and strategies at the time of project approval. Under strategic relevance an assessment of the complementarity of the project with other interventions addressing the needs of the same target groups will be made. This criterion comprises four elements:

⁶⁰ <http://www.UNEnvironment.org/eou/StandardsPolicyandPractices/UNENVIRONMENTEvaluationPolicy/tabid/3050/language/en-US/Default.aspx>

⁶¹ http://www.UNEnvironment.org/QAS/Documents/UNENVIRONMENT_Programme_Manual_May_2013.pdf . This manual is under revision.

i. Alignment to the UN Environment Medium Term Strategy⁶² (MTS) and Programme of Work (POW)

The evaluation should assess the project's alignment with the MTS and POW under which the project was approved and include reflections on the scale and scope of any contributions made to the planned results reflected in the relevant MTS and POW.

ii. Alignment to UN Environment /GEF/Donor Strategic Priorities

Donor, including GEF, strategic priorities will vary across interventions. UN Environment strategic priorities include the Bali Strategic Plan for Technology Support and Capacity Building⁶³ (BSP) and South-South Cooperation (S-SC). The BSP relates to the capacity of governments to: comply with international agreements and obligations at the national level; promote, facilitate and finance environmentally sound technologies and to strengthen frameworks for developing coherent international environmental policies. S-SC is regarded as the exchange of resources, technology and knowledge between developing countries. GEF priorities are specified in published programming priorities and focal area strategies.

iii. Relevance to Regional, Sub-regional and National Environmental Priorities

The evaluation will assess the extent to which the intervention is suited, or responding to, the stated environmental concerns and needs of the countries, sub-regions or regions where it is being implemented. Examples may include: national or sub-national development plans, poverty reduction strategies or Nationally Appropriate Mitigation Action (NAMA) plans or regional agreements etc.

iv. Complementarity with Existing Interventions

An assessment will be made of how well the project, either at design stage or during the project mobilization, took account of ongoing and planned initiatives (under the same sub-programme, other UN Environment sub-programmes, or being implemented by other agencies) that address similar needs of the same target groups. The evaluation will consider if the project team, in collaboration with Regional Offices and Sub-Programme Coordinators, made efforts to ensure their own intervention was complementary to other interventions, optimized any synergies and avoided duplication of effort. Examples may include UNDAFs or One UN programming. Linkages with other interventions should be described and instances where UN Environment's comparative advantage has been particularly well applied should be highlighted.

Factors affecting this criterion may include: stakeholders' participation and cooperation; responsiveness to human rights and gender equity and country ownership and driven-ness.

B. Quality of Project Design

The quality of project design is assessed using an agreed template during the evaluation inception phase, ratings are attributed to identified criteria and an overall Project Design Quality rating is established. This overall Project Design Quality rating is entered in the final evaluation ratings table as item B. In the Main Evaluation Report a summary of the project's strengths and weaknesses at design stage is included.

Factors affecting this criterion may include (at the design stage): stakeholders participation and cooperation and responsiveness to human rights and gender equity, including the extent to which relevant actions are adequately budgeted for.

C. Nature of External Context

At evaluation inception stage a rating is established for the project's external operating context (considering the prevalence of conflict, natural disasters and political upheaval). This rating is entered in the final evaluation ratings table as item C. Where a project has been rated as facing either an Unfavourable or Highly Unfavourable and unexpected external operating

⁶² UN Environment's Medium Term Strategy (MTS) is a document that guides UN Environment's programme planning over a four-year period. It identifies UN Environment's thematic priorities, known as Sub-programmes (SP), and sets out the desired outcomes, known as Expected Accomplishments (EAs), of the Sub-programmes.

⁶³ <http://www.UNEnvironment.org/GC/GC23/documents/GC23-6-add-1.pdf>

context, the overall rating for Effectiveness may be increased at the discretion of the Evaluation Consultant and Evaluation Manager together. A justification for such an increase must be given.

D. Effectiveness

The evaluation will assess effectiveness across three dimensions: achievement of outputs, achievement of direct outcomes and likelihood of impact.

i. Achievement of Outputs

The evaluation will assess the project's success in producing the programmed outputs (products and services delivered by the project itself) and achieving milestones as per the project design document (ProDoc). Any *formal* modifications/revisions made during project implementation will be considered part of the project design. Where the project outputs are inappropriately or inaccurately stated in the ProDoc, a table should be provided showing the original formulation and the amended version for transparency. The achievement of outputs will be assessed in terms of both quantity and quality, and the assessment will consider their usefulness and the timeliness of their delivery. The evaluation will briefly explain the reasons behind the success or shortcomings of the project in delivering its programmed outputs and meeting expected quality standards.

Factors affecting this criterion may include: preparation and readiness and quality of project management and supervision⁶⁴.

ii. Achievement of Direct Outcomes

The achievement of direct outcomes is assessed as performance against the direct outcomes as defined in the reconstructed⁶⁵ Theory of Change. These are the first-level outcomes expected to be achieved as an immediate result of project outputs. As in 1, above, a table can be used where substantive amendments to the formulation of direct outcomes is necessary. The evaluation should report evidence of attribution between UN Environment's intervention and the direct outcomes. In cases of normative work or where several actors are collaborating to achieve common outcomes, evidence of the nature and magnitude of UN Environment's contribution should be included.

Factors affecting this criterion may include: quality of project management and supervision; stakeholders' participation and cooperation; responsiveness to human rights and gender equity and communication and public awareness.

iii. Likelihood of Impact

Based on the articulation of longer term effects in the reconstructed TOC (i.e. from direct outcomes, via intermediate states, to impact), the evaluation will assess the likelihood of the intended, positive impacts becoming a reality. The Evaluation Office's approach to the use of TOC in project evaluations is outlined in a guidance note available on the EOU website (<http://www.unep.org/evaluation/>) and is supported by an excel-based flow chart called, Likelihood of Impact Assessment (see Annex 1). Essentially the approach follows a 'likelihood tree' from direct outcomes to impacts, taking account of whether the assumptions and drivers identified in the reconstructed TOC held. Any unintended positive effects should also be identified and their causal linkages to the intended impact described.

⁶⁴ In some cases 'project management and supervision' will refer to the supervision and guidance provided by UN Environment to implementing partners and national governments while in others, specifically for GEF funded projects, it will refer to the project management performance of the executing agency and the technical backstopping provided by UN Environment.

⁶⁵ UN Environment staff are currently required to submit a Theory of Change with all submitted project designs. The level of 'reconstruction' needed during an evaluation will depend on the quality of this initial TOC, the time that has lapsed between project design and implementation (which may be related to securing and disbursing funds) and the level of any changes made to the project design. In the case of projects pre-dating 2013 the intervention logic is often represented in a logical framework and a TOC will need to be constructed in the inception stage of the evaluation.

The evaluation will also consider the likelihood that the intervention may lead, or contribute to, unintended negative effects. Some of these potential negative effects may have been identified in the project design as risks or as part of the analysis of Environmental, Social and Economic Safeguards.⁶⁶

The evaluation will consider the extent to which the project has played a catalytic role or has promoted scaling up and/or replication⁶⁷ as part of its Theory of Change and as factors that are likely to contribute to longer term impact.

Ultimately UN Environment and all its partners aim to bring about benefits to the environment and human well-being. Few projects are likely to have impact statements that reflect such long-term or broad-based changes. However, the evaluation will assess the likelihood of the project to make a substantive contribution to the high level changes represented by UN Environment's Expected Accomplishments, the Sustainable Development Goals⁶⁸ and/or the high level results prioritised by the funding partner.

Factors affecting this criterion may include: quality of project management and supervision, including adaptive project management; stakeholders participation and cooperation; responsiveness to human rights and gender equity; country ownership and driven-ness and communication and public awareness.

E. Financial Management

Financial management will be assessed under three broad themes: *completeness* of financial information, *communication* between financial and project management staff and *compliance* with relevant UN financial management standards and procedures. The evaluation will establish the actual spend across the life of the project of funds secured from all donors. This expenditure will be reported, where possible, at output level and will be compared with the approved budget. The evaluation will assess the level of communication between the Task Manager and the Fund Management Officer as it relates to the effective delivery of the planned project and the needs of a responsive, adaptive management approach. The evaluation will verify the application of proper financial management standards and adherence to UN Environment's financial management policies. Any financial management issues that have affected the timely delivery of the project or the quality of its performance will be highlighted.

Factors affecting this criterion may include: preparation and readiness and quality of project management and supervision.

F. Efficiency

In keeping with the OECD/DAC definition of efficiency, the evaluation will assess the cost-effectiveness and timeliness of project execution. Focussing on the translation of inputs into outputs, cost-effectiveness is the extent to which an intervention has achieved, or is expected to achieve, its results at the lowest possible cost. Timeliness refers to whether planned activities were delivered according to expected timeframes as well as whether events were sequenced efficiently. The evaluation will also assess to what extent any project extension could have been avoided through stronger project management and identify any negative impacts caused by project delays or extensions. The evaluation will describe any cost or time-saving measures put in place to maximise results within the secured budget and agreed project timeframe and consider whether the project was implemented in the most efficient way compared to alternative interventions or approaches.

The evaluation will give special attention to efforts by the project teams to make use of/build upon pre-existing institutions, agreements and partnerships, data sources, synergies and complementarities with other initiatives, programmes and projects etc. to increase project efficiency. The evaluation will also consider the extent to which the management of the project minimised UN Environment's environmental footprint.

Factors affecting this criterion may include: preparation and readiness (e.g. timeliness); quality of project management and supervision and stakeholders participation and cooperation.

⁶⁶ Further information on Environmental, Social and Economic Safeguards (ESES) can be found at <http://www.UN Environment.org/about/eses/>

⁶⁷ *Scaling up* refers to approaches being adopted on a much larger scale, but in a very similar context. Scaling up is often the longer term objective of pilot initiatives. *Replication* refers to approaches being repeated or lessons being explicitly applied in new/different contexts e.g. other geographic areas, different target group etc. Effective replication typically requires some form of revision or adaptation to the new context. It is possible to replicate at either the same or a different scale.

⁶⁸ A list of relevant SDGs is available on the EO website www.UN Environment.org/evaluation

G. Monitoring and Reporting

The evaluation will assess monitoring and reporting across three sub-categories: monitoring design and budgeting, monitoring implementation and project reporting.

i. Monitoring Design and Budgeting

Each project should be supported by a sound monitoring plan that is designed to track progress against SMART⁶⁹ indicators towards the achievement of the projects outputs and direct outcomes, including at a level disaggregated by gender or groups with low representation. The evaluation will assess the quality of the design of the monitoring plan as well as the funds allocated for its implementation. The adequacy of resources for mid-term and terminal evaluation/review should be discussed if applicable.

ii. Monitoring Implementation

The evaluation will assess whether the monitoring system was operational and facilitated the timely tracking of results and progress towards projects objectives throughout the project implementation period. It will also consider how information generated by the monitoring system during project implementation was used to adapt and improve project execution, achievement of outcomes and ensure sustainability. The evaluation should confirm that funds allocated for monitoring were used to support this activity.

iii. Project Reporting

UN Environment has a centralised Project Information Management System (PIMS) in which project managers upload six-monthly status reports against agreed project milestones. This information will be provided to the Evaluation Consultant(s) by the Evaluation Manager. Some projects have additional requirements to report regularly to funding partners, which will be supplied by the project team (specifically the Project Implementation Reviews and Tracking Tool). The evaluation will assess the extent to which both UN Environment and donor reporting commitments have been fulfilled.

Factors affecting this criterion may include: quality of project management and supervision and responsiveness to human rights and gender equity (e.g. disaggregated indicators and data).

H. Sustainability

Sustainability is understood as the probability of direct outcomes being maintained and developed after the close of the intervention. The evaluation will identify and assess the key conditions or factors that are likely to undermine or contribute to the persistence of achieved direct outcomes. Some factors of sustainability may be embedded in the project design and implementation approaches while others may be contextual circumstances or conditions that evolve over the life of the intervention. Where applicable an assessment of bio-physical factors that may affect the sustainability of direct outcomes may also be included.

i. Socio-political Sustainability

The evaluation will assess the extent to which social or political factors support the continuation and further development of project direct outcomes. It will consider the level of ownership, interest and commitment among government and other stakeholders to take the project achievements forwards. In particular the evaluation will consider whether individual capacity development efforts are likely to be sustained.

ii. Financial Sustainability

Some direct outcomes, once achieved, do not require further financial inputs, e.g. the adoption of a revised policy. However, in order to derive a benefit from this outcome further management action may still be needed e.g. to undertake actions to enforce the policy. Other direct outcomes may be dependent on a continuous flow of action that needs to be resourced for them to be maintained, e.g. continuation of a new resource management approach. The evaluation will assess the extent to which project outcomes are dependent on future funding for the benefits they bring to be sustained. Secured future funding is only relevant to financial sustainability where the direct outcomes of a project have been extended into a future project phase. The question still remains as to whether the future project outcomes will be financially sustainable.

iii. Institutional Sustainability

⁶⁹ SMART refers to indicators that are specific, measurable, assignable, realistic and time-specific.

The evaluation will assess the extent to which the sustainability of project outcomes is dependent on issues relating to institutional frameworks and governance. It will consider whether institutional achievements such as governance structures and processes, policies, sub-regional agreements, legal and accountability frameworks etc. are robust enough to continue delivering the benefits associated with the project outcomes after project closure.

Factors affecting this criterion may include: Stakeholders participation and cooperation; responsiveness to human rights and gender equity (e.g. where interventions are not inclusive, their sustainability may be undermined); communication and public awareness and country ownership and driven-ness.

I. Factors and Processes Affecting Project Performance

(These factors are rated in the ratings table, but are discussed as cross-cutting themes as appropriate under the other evaluation criteria, above).

i. Preparation and Readiness

This criterion focuses on the inception or mobilisation stage of the project. The evaluation will assess whether appropriate measures were taken to either address weaknesses in the project design or respond to changes that took place between project approval, the securing of funds and project mobilisation. In particular the evaluation will consider the nature and quality of engagement with stakeholder groups by the project team, the confirmation of partner capacity and development of partnership agreements as well as initial staffing and financing arrangements. (Project preparation is covered in the template for the assessment of Project Design Quality).

ii. Quality of Project Management and Supervision

In some cases 'project management and supervision' will refer to the supervision and guidance provided by UN Environment to implementing partners and national governments while in others, specifically for GEF funded projects, it will refer to the project management performance of the executing agency and the technical backstopping and supervision provided by UN Environment.

The evaluation will assess the effectiveness of project management with regard to: providing leadership towards achieving the planned outcomes; managing team structures; maintaining productive partner relationships (including Steering Groups etc.); communication and collaboration with UN Environment colleagues; risk management; use of problem-solving; project adaptation and overall project execution. Evidence of adaptive project management should be highlighted.

iii. Stakeholder Participation and Cooperation

Here the term 'stakeholder' should be considered in a broad sense, encompassing all project partners, duty bearers with a role in delivering project outputs and target users of project outputs and any other collaborating agents external to UN Environment. The assessment will consider the quality and effectiveness of all forms of communication and consultation with stakeholders throughout the project life and the support given to maximise collaboration and coherence between various stakeholders, including sharing plans, pooling resources and exchanging learning and expertise. The inclusion and participation of all differentiated groups, including gender groups, should be considered.

iv. Responsiveness to Human Rights and Gender Equity

The evaluation will ascertain to what extent the project has applied the UN Common Understanding on the human rights based approach (HRBA) and the UN Declaration on the Rights of Indigenous People. Within this human rights context the evaluation will assess to what extent the intervention adheres to UN Environment's Policy and Strategy for Gender Equality and the Environment.

The report should present the extent to which the intervention, following an adequate gender analysis at design stage, has implemented the identified actions and/or applied adaptive management to ensure that Gender Equity and Human Rights are adequately taken into account. In particular, the evaluation will consider to what extent project design (section B), the implementation that underpins effectiveness (section D), and monitoring (section G) have taken into consideration: (i) possible gender inequalities in access to and the control over natural resources; (ii) specific vulnerabilities of women and children to environmental degradation or disasters; (iii) the role of women in mitigating or adapting to environmental changes and engaging in environmental protection and rehabilitation.

v. Country Ownership and Driven-ness

The evaluation will assess the quality and degree of engagement of government / public sector agencies in the project. The evaluation will consider the involvement not only of those directly involved in project execution and those participating in technical or leadership groups, but also those official representatives whose cooperation is needed for change to be embedded in their respective institutions and offices. This factor is concerned with the level of ownership generated by the project over outputs and outcomes and that is necessary for long term impact to be realised. This ownership should adequately represent the needs and interests of all gender and marginalised groups.

vi. Communication and Public Awareness

The evaluation will assess the effectiveness of: a) communication of learning and experience sharing between project partners and interested groups arising from the project during its life and b) public awareness activities that were undertaken during the implementation of the project to influence attitudes or shape behaviour among wider communities and civil society at large. The evaluation should consider whether existing communication channels and networks were used effectively, including meeting the differentiated needs of gender and marginalised groups, and whether any feedback channels were established. Where knowledge sharing platforms have been established under a project the evaluation will comment on the sustainability of the communication channel under either socio-political, institutional or financial sustainability, as appropriate.

c. SECTION 3. EVALUATION APPROACH, METHODS AND DELIVERABLES

The Terminal Evaluation will be an in-depth evaluation using a participatory approach whereby key stakeholders are kept informed and consulted throughout the evaluation process. Both quantitative and qualitative evaluation methods will be used as appropriate to determine project achievements against the expected outputs, outcomes and impacts. It is highly recommended that the consultant(s) maintains close communication with the project team and promotes information exchange throughout the evaluation implementation phase in order to increase their (and other stakeholder) ownership of the evaluation findings.

The findings of the evaluation will be based on the following:

(a) A desk review of:

Relevant background documentation, inter alia UNEP and GEF-4 policies, strategies and programmes pertaining to biosafety at the time of the project's approval;

Project design documents (including project design approvals/endorsement, GEF Secretariat Project Review sheet, approved project document (ProDoc), Annual Work Plans and Budgets or equivalent, revisions to the project (Project Document Supplement), the logical/results framework and its budget;

Project reports such as six-monthly progress reports including the Project Implementation Reviews and Tracking Tool etc., quarterly financial expenditure reports, progress reports from collaborating partners, relevant meeting minutes, relevant correspondence, etc.

Project outputs, as applicable, based on the results framework;

Any other documentation deemed relevant for the accurate assessment of the project's implementation.

(b) Interviews (individual or in group) with:

UN Environment Task Manager (TM) – Alex Owusu-Biney;

Project management team based in the project countries;

UN Environment Fund Management Officer (FMO) - Paul Vrontamitis;

Sub-Programme Coordinator – Cristina Zucca ;

Project partners – relevant government ministries, national and local non-governmental organizations, private sector, universities and research institutes;

Other relevant resource persons.

Surveys - as deemed appropriate, and based on the stakeholders analysis

Field visits to the relevant project participants and pilot sites in Turkey.

Other data collection tools as will be found appropriate to supplement information for these evaluations.

○ **Evaluation Deliverables and Review Procedures**

The consultant will prepare and submit the following deliverables for **each project (Turkey and India)**:

- **Inception Report:** (see Annex 1 for links to all templates, tables and guidance notes) containing an assessment of project design quality, a draft reconstructed Theory of Change of the project, project project stakeholder analysis, evaluation framework and a tentative evaluation schedule.
- **Draft and Final Evaluation Report:** (see links in Annex 1) containing an executive summary that can act as a stand-alone document; detailed analysis of the evaluation findings organised by evaluation criteria and supported with evidence; lessons learned and recommendations and an annotated ratings table.
- **Evaluation Brief:** a 2-page summary of key evaluation results for wider dissemination through the EOU website.

Detailed Review Procedure

Review procedure for the evaluation report. The evaluation team will submit a draft report to the Evaluation Manager and revise the draft in response to their comments and suggestions. Once a draft of adequate quality has been peer-reviewed and accepted, the Evaluation Manager will share the cleared draft report with the Project Manager, who will alert the Evaluation Manager in case the report contains any blatant factual errors. The Evaluation Manager will then forward revised draft report (corrected by the evaluation team where necessary) to other project stakeholders, for their review and comments. Stakeholders may provide feedback on any errors of fact and may highlight the significance of such errors in any conclusions as well as providing feedback on the proposed recommendations and lessons. Any comments or responses to draft reports will be sent to the Evaluation Manager for consolidation. The Evaluation Manager will provide all comments to the evaluation team for consideration in preparing the final report, along with guidance on areas of contradiction or issues requiring an institutional response.

Based on a careful review of the evidence collated by the evaluation consultants and the internal consistency of the report, the Evaluation Manager will provide an assessment of the ratings in the final evaluation report. Where there are differences of opinion between the evaluator and the Evaluation Manager on project ratings, both viewpoints will be clearly presented in the final report. The Evaluation Office ratings will be considered the final ratings for the project.

The Evaluation Manager will prepare a **quality assessment** of the first and final drafts of the main evaluation report, which acts as a tool for providing structured feedback to the evaluation consultants. The quality of the report will be assessed and rated against the criteria specified in template listed in Annex 1.

At the end of the evaluation process, the Evaluation Office will prepare a **Recommendations Implementation Plan** in the format of a table, to be completed and updated at regular intervals by the Task Manager. The Evaluation Office will track compliance against this plan on a six monthly basis.

○ **The Consultant**

For this evaluation, one consultant will work under the overall responsibility of the Evaluation Office represented by an Evaluation Manager (Pauline Marima), in consultation with the UN Environment Task Manager (Alex Owusu-Biney), Fund Management Officer (Paul Vrontamitis⁷⁰) and the Sub-programme Coordinator of the Environmental Governance Sub-programme (Cristina Zucca). The consultant will liaise with the Evaluation Manager on any procedural and methodological matters related to the evaluation. It is, however, the consultant's individual responsibility to arrange for their travel, visa, obtain documentary evidence, plan meetings with stakeholders, organize online surveys, and any other logistical matters related to the assignment. The UN Environment Task Manager and project teams will, where possible, provide logistical support (introductions, meetings etc.) allowing the consultant to conduct the evaluation as efficiently and independently as possible.

The consultant will be hired over the period August /2017 to January/2018 during which time the evaluation deliverables listed in Section 11 'Evaluation Deliverables' above should be submitted.

S/he should have: an advanced university degree in sciences, evaluation experience preferably using a Theory of Change approach, at least 15 years' experience in environmental management or a related field, with a preference for specific expertise in the area of biosafety and biodiversity. Knowledge of English language along with excellent writing skills in English is required. Experience in managing partnerships, knowledge management and communication is desirable for all evaluation consultants.

⁷⁰ Ruth Irungu supports Paul Vrontamitis in the fund management of the projects

The consultant will be responsible, in close consultation with the Evaluation Office of UN Environment, for overall management of these evaluations and timely delivery of their outputs, described above in Section 11 Evaluation Deliverables, above. The consultant will ensure that all evaluation criteria and questions are adequately covered. Detailed guidelines for the Evaluation Consultant can be found on the Evaluation Office of UN Environment website: (<http://web.unep.org/evaluation/working-us/working-us>).

Specific Responsibilities:

The Consultant will be responsible, in close consultation with the Evaluation Office of UN Environment, for overall management of the evaluation and timely delivery of its outputs, described in Section 11 Evaluation Deliverables, above. The consultant will ensure that all evaluation criteria and questions are adequately covered. S/he will be responsible for the evaluation design, data collection and analysis, and report-writing. More specifically:

Inception phase of the evaluation, including:

- preliminary desk review and introductory interviews with project staff;
- draft the reconstructed Theory of Change of the project;
- prepare the evaluation framework;
- develop the desk review, interview protocols, data collection and analysis tools;
- plan the evaluation schedule;
- prepare the Inception Report, incorporating comments received from the Evaluation Office.

Data collection and analysis phase of the evaluation, including:

- conduct further desk review and in-depth interviews with project implementing and executing agencies, project partners and project stakeholders;
- conduct an evaluation mission to Cameroon visit the project locations, interview project partners and stakeholders, including a good representation of local communities. Ensure independence of the evaluation and confidentiality of evaluation interviews.
- regularly report back to the Evaluation Office on progress and inform of any possible problems or issues encountered and;
- keep the Project/Task Manager informed of the evaluation progress and engage the Project/Task Manager in discussions on emerging findings throughout the evaluation process.

Reporting phase, including:

- draft the Main Evaluation Report, ensuring that the evaluation report is complete, coherent and consistent with the Evaluation Office guidelines both in substance and style;
- liaise with the Evaluation Office on comments received and finalize the Main Evaluation Report, ensuring that comments are taken into account
- prepare a Response to Comments annex for the main report, listing those comments not accepted by the Evaluation Consultant and indicating the reason for the rejection; and
- prepare a 2-page summary of the key evaluation findings and lessons;

Managing relations, including:

- maintain a positive relationship with evaluation stakeholders, ensuring that the evaluation process is as participatory as possible but at the same time maintains its independence;
- communicate in a timely manner with the Evaluation Office on any issues requiring its attention and intervention.

○ **Schedule of the evaluation**

The table below presents the tentative schedule for the evaluation.

Table 6. Tentative schedule for the evaluation – Turkey and India

Milestone	Tentative schedule
Kick-off meeting (via Skype)	Late August 2017
Inception Report	Early September 2017
Data collection and analysis, desk-based interviews and surveys	August - October 2017
Field Mission approx. 5 days in Turkey and approx. 5 days in India (based on meeting arrangements and available budget)	Early October 2017
Draft report to Evaluation Manager (and Peer Reviewer)	End of October 2017
Draft Report shared with UN Environment Task Manager and Project Team	November 2017
Draft Report shared with wider group of stakeholders	December 2017
Final Report	January 2018

○ **Contractual Arrangements**

Evaluation Consultants are selected and recruited by the Evaluation Office of UN Environment under an individual Special Service Agreement (SSA) on a “fees only” basis (see below). By signing the service contract with UN Environment/UNON, the consultant certifies that they have not been associated with the design and implementation of the project in any way which may jeopardize their independence and impartiality towards project achievements and project partner performance. In addition, they will not have any future interests (within six months after completion of the contract) with the project’s executing or implementing units. All consultants are required to sign the Code of Conduct Agreement Form.

Fees will be paid on an instalment basis, paid on acceptance by the Evaluation Office of expected key deliverables. The schedule of payment is as follows:

Table 7. Schedule of Payment for the Consultant:

Deliverable	Percentage Payment
Approved Inception Report	30%
Approved Draft Main Evaluation Report	40%
Approved Final Main Evaluation Report	30%

Fees only contracts: Air tickets will be purchased by UN Environment and 75% of the DSA for each authorised travel mission will be paid up front. Local in-country travel will only be reimbursed where agreed in advance with the Evaluation Office and on the production of acceptable receipts. Terminal expenses and residual DSA entitlements (25%) will be paid after mission completion.

The consultant may be provided with access to UN Environment’s Programme Information Management System (PIMS) and if such access is granted, the consultant agrees not to disclose information from that system to third parties beyond information required for, and included in, the evaluation report.

In case the consultant is not able to provide the deliverables in accordance with these guidelines, and in line with the expected quality standards by the UN Environment Evaluation Office, payment may be withheld at the discretion of the Director of the Evaluation Office until the consultants have improved the deliverables to meet UN Environment’s quality standards.

If the consultant fails to submit a satisfactory final product to UN Environment in a timely manner, i.e. before the end date of their contract, the Evaluation Office reserves the right to employ additional human resources to finalize the report, and to reduce the consultants’ fees by an amount equal to the additional costs borne by the Evaluation Office to bring the report up to standard.

Annex III. Evaluation Itinerary

Agenda implemented - List of People met / institutions

DATE	PARTICIPANTS	INSTITUTE	SUBJECT - Comments
04 December 2017 10.00-12.00	<ul style="list-style-type: none"> Dr. Yusuf ARSLAN Project Coordinator Birgül GÜNER Project assistant Serdar AYDEMİR Hilal YUCE ARSLAN Project Management Unit Fatma Gül MARAŞ VANLIOĞLU 	MARA / GDAR Republic of Turkey Ministry of Food, Agriculture and Livestock General Directorate of Agricultural Research And Policies	Briefing Session and overview Meeting National Executing Agency as well as National Focal Point for CPB Focal point for BCH
04 December 2017 14.00-17.00	<ul style="list-style-type: none"> Muharrem SELCUK General Director Fatih KAYA Eren NUMANOĞLU Beyza BALABAN Çiğdem ÖNER Muharrem KELEŞ Experts 	MARA/General Directorate of Food and Control MARA/General Directorate of Food and Control	Competent Authority for CPB (FFP-LMOs)
05 December 2017 10.00-12.00	<ul style="list-style-type: none"> Prof. Dr. Hakan YARDIMCI Former Chair of the Biosafety Board 	Ankara University	Implementation of Biosafety Board
05 December 2017 15.00-16.00	<ul style="list-style-type: none"> Prof. Dr. Dürdane KOLANKAYA Academician 	Hacettepe University	Risk Assessment
	<ul style="list-style-type: none"> Doç. Dr. Remziye YILMAZ Academician 	Hacettepe University	GMO Analysis Risk Assessment
	<ul style="list-style-type: none"> Prof. Dr. Emine OLHAN Academician and National consultant 	Ankara University	Socio-economic considerations on GMOs
	<ul style="list-style-type: none"> Doç. Dr. Füsun EYİDOĞAN Academician 	Baskent University	
	<ul style="list-style-type: none"> Prof. Dr. F. Füsun ERDEN Academician 	Ankara University	Socio-economic considerations on GMOs
05 December 2017 16.00-18.00	<ul style="list-style-type: none"> Birgül GÜNER Project assistant Serdar AYDEMİR Hilal YUCE ARSLAN Project Management Unit 	MARA / GDAR Republic of Turkey Ministry of Food, Agriculture and Livestock General Directorate of Agricultural Research And Policies	

DATE	PARTICIPANTS	INSTITUTE	SUBJECT - Comments
	<ul style="list-style-type: none"> Doç. Dr. Remziye YILMAZ National consultant Member of and Biotechnology Association 	Hacettepe University	
06 December 2017 09.30-12.00	<ul style="list-style-type: none"> Birgül GÜNER Project assistant Serdar AYDEMİR Hilal YUCE ARSLAN Project Management Unit Fatma Gül MARAŞ VANLIOĞLU 	MARA / GDAR Republic of Turkey Ministry of Food, Agriculture and Livestock General Directorate of Agricultural Research And Policies	
06 December 2017 14.00-16.00	<ul style="list-style-type: none"> Hüsniye KILINÇARSLAN Ergül TERZİOĞLU Experts 	Ministry of Forestry and Water Affairs	*Focal Point for CBD
06 December 2017 16.00-18.00	<ul style="list-style-type: none"> Birgül GÜNER Project assistant Serdar AYDEMİR Hilal YUCE ARSLAN Project Management Unit Fatma Gül MARAŞ VANLIOĞLU 	MARA / GDAR Republic of Turkey Ministry of Food, Agriculture and Livestock General Directorate of Agricultural Research And Policies	
07 December 2017 09.30-12.00	<ul style="list-style-type: none"> Birgül GÜNER Project assistant Serdar AYDEMİR Hilal YUCE ARSLAN Project Management Unit 	MARA / GDAR Republic of Turkey Ministry of Food, Agriculture and Livestock General Directorate of Agricultural Research And Policies	
07 December 2017 14.00-17.00	<ul style="list-style-type: none"> Mete CEVIK Experts 	Ministry for EU Affairs	Stakeholder
	<ul style="list-style-type: none"> Özcan TUTUMLU Experts 	Ministry of Science, Industry and Technology	Stakeholder
07 December 2017 17.00-18.00	<ul style="list-style-type: none"> Aslı İLGEN Deputy Secretary General 	Turkish Poultry Meat Producers and Breeders Association	Private Sector
	<ul style="list-style-type: none"> Serkan ÖZBUDAK Secretary General 	Turkish Feed Manufacturer's Association	Private Sector
08 December 2017 10.00-12.00	<ul style="list-style-type: none"> Birgül GÜNER Project assistant Serdar AYDEMİR Hilal YUCE ARSLAN Project Management Unit 	Republic of Turkey Ministry of Food, Agriculture and Livestock General Directorate of Agricultural Research And Policies	
13.30-14.00	<ul style="list-style-type: none"> Dr. Yusuf ARSLAN Project Coordinator 	MARA / GDAR Republic of Turkey Ministry of Food, Agriculture and Livestock	

DATE	PARTICIPANTS	INSTITUTE	SUBJECT - Comments
		General Directorate of Agricultural Research And Policies	
14.00-14.30	<ul style="list-style-type: none"> Dr. Nevzat BİRİŞİK General Director 	MARA / GDAR Republic of Turkey Ministry of Food, Agriculture and Livestock General Directorate of Agricultural Research And Policies	
17.00-18.00	<ul style="list-style-type: none"> Birgül GÜNER Project assistant Serdar AYDEMİR Hilal YUCE ARSLAN Project Management Unit 	MARA / GDAR Republic of Turkey Ministry of Food, Agriculture and Livestock General Directorate of Agricultural Research And Policies	Debriefing Meeting

People met during the country visit

PARTICIPANTS	INSTITUTE	E-MAIL
1. General Director Dr. Nevzat BİRİŞİK	MARA / GDAR Republic of Turkey Ministry of Food, Agriculture and Livestock General Directorate of Agricultural Research And Policies	nevzat.birisikarim.gov.tr
2. Dr. Yusuf ARSLAN Project Coordinator		yusuf.arслан@tarim.gov.tr
3. Birgül GÜNER Project assistant		birgul.guner@tarim.gov.tr
4. Serdar AYDEMİR Project Management Unit		serdar.aydemir@tarim.gov.tr
5. Hilal YUCE ARSLAN Project Management Unit		hilalyuce.arслан@tarim.gov.tr
6. Fatma Gül MARAŞ VALIOĞLU	MARA / GDAR Republic of Turkey Ministry of Food, Agriculture and Livestock Biotechnology Research Center	fatmagul.maras@tarim.gov.tr
7. Muharrem SELCUK General Director	MARA Republic of Turkey Ministry of Food, Agriculture and Livestock General Directorate of Food and Control	muharrem.selcuk@tarim.gov.tr
8. Fatih KAYA Experts		fatih.kaya@tarim.gov.tr
9. Muharrem KELEŞ Experts		muharrem.keles@tarim.gov.tr
10. Eren NUMANOĞLU Experts		eren.numanoglu@tarim.gov.tr
11. Beyza BALABAN Experts		beyza.balaban@tarim.gov.tr
12. Çiğdem ÖNER Experts		cigdem.oner@tarim.gov.tr

PARTICIPANTS	INSTITUTION	E-MAIL
13. Prof. Dr. Hakan YARDIMCI <i>Former Chair of the Biosafety Board</i>	Ankara University	yardimci.h@gmail.com
14. Prof. Dr. Dürdane KOLANKAYA <i>Academician</i>	Hacettepe University	durdane@hacettepe.edu.tr
15. Doç. Dr. Remziye YILMAZ <i>a. Academician and b. National consultant Member of and Biotechnology Association</i>	Hacettepe University	remziye06@gmail.com
16. Prof. Dr. Emine OLHAN <i>Academician and National consultant</i>	Ankara University	olhan@agri.ankara.edu.tr
17. Doç. Dr. Füsün EYİDOĞAN <i>Academician</i>	Baskent University	fusunie@baskent.edu.tr
18. Prof. Dr. F. Füsün ERDEN <i>Academician</i>	Ankara University	f.fusun.erden@gmail.com
19. Aslı İLGEN <i>Deputy Secretary General</i>	Turkish Poultry Meat Producers and Breeders Association	asli@besd-bir.org
20. Serkan OZBUDAK <i>a. Secretary General</i>	Turkish Feed Manufacturer's Association	info@yem.org.tr
21. Hüsnüye KILINÇARSLAN <i>Experts</i>	Ministry of Forestry and Water Affairs	hkilicarslan@ormansu.gov.tr
22. Ergül TERZİOĞLU <i>Experts</i>		eterzioglu@ormansu.gov.tr
23. Mete CEVİK <i>a. Experts</i>	Ministry for EU Affairs	mcevik@ab.gov.tr
24. Özcan TUTUMLU <i>Experts</i>	Ministry of Science, Industry and Technology	ozcantu@sanayi.gov.tr

Annex IV. Summary of Co-finance Information and Statement of Project Expenditure by Activity

GEF Budget at design and expenditures by components (August 2017)

Component/sub-component	Estimated cost at design (USD)	Actual Cost (USD)	Expenditure ratio (actual/planned)
1. Stocktaking and Biosafety Policy	5,000	na	
2. Regulatory biosafety regime	14,000	na	
3 System for handling of requests, risk assessment, decision-making and risk management of LMOs	128,000	na	
4. Monitoring and inspection system for LMOs	272,650	na	
5. Public awareness & participation for biosafety	53,000		
5. Project coordination, Monitoring and Evaluation	20,000	na	
Total	542,650	524,897.82	96,67%

Co-financing Table

Co-financing (Type/Source)	UNEP own Financing (US\$1,000)		Government (US\$1,000)		Other* (US\$1,000)		Total (US\$1,000)		Total Disbursed (US\$1,000)
	Planned	Actual	Planned	Actual	Planned	Actual	Planned	Actual	
Grants			550	550			550	550	550
– Loans									
– Credits									
– Equity investments									
– In-kind support			200	200			200	200	200
– Other (*)									
Totals			750	750			750	750	750

Annex V. Evaluation Brief

Terminal Evaluation of the UN Environment Project: “Implementation of National Biosafety Framework for Turkey” GEF – UN Environment (08/2013 – 08/ 2017)



Mt. Ağrı (5137 m) of eastern Turkey seen from Lake Kuyucuk of Kars, 137 km away. © Çağan H. Şekercioğlu

The project was a Medium Size Project (MSP) financed through GEF-4 mechanism and belonged to GEF Biodiversity Focal Area. It was relevant to GEF Strategic Programme 6 (BD-SP6): Building Capacity for the Implementation of the Cartagena Protocol on Biosafety. The Project was part of two UN Environment Medium-Term Strategies (2010-2013 and 2014-2017) and three Biennial PoWs (Programme of Work), i.e. 2012-2013, 2014-2015 and 2016-2017, Environmental Governance Sub-Programme.

The total budget of the Project was 1,292,650 USD, the 42% of which represented the GEF allocation (USD 542,650) and the remaining 58% (USD 750,000) was the contribution of the Government of Turkey.

The expected Main Outcome of the Project was “A fully effective National Biosafety Framework in Turkey” underpinned by four Direct Outcomes, i.e. a) Regulatory regime; b) Administrative system for handling applications, Risk Assessment and Risk Management; c) Monitoring and inspection system; d) Functional system for public awareness and participation.



The National Executing Agency (NEA) of the Project was the Ministry of Food, Agriculture and Livestock (MFAL), which is also one of the two Competent National Authorities (CNA) for Biosafety in Turkey. The other CNA is the Ministry of Forestry and Water Affairs (MFWA), through its General Directorate of Nature Protection and Natural Parks. The NEA also insured the Project Management Unit (PMU). A nine-member National Steering Committee (NSC) ensured Project's supervision.



The evaluation's purpose was a) to provide evidence of results for accountability reasons, and b) to promote learning, feedback, and knowledge sharing among the UN Environment, the GEF, the National Executing Agency and the national partners.

The evaluation analysed project related documentation and an inception report was prepared, which underwent a Peer Review at the UN Environment Evaluation Office and was shared with the Biosafety Task Manager at UN Environment. A country visit was prepared in strict collaboration with the Task Manager and the Project Management Unit (PMU) with which the field mission agenda was fine-tuned, as well as the list of stakeholders to be met. During the five-day country visit, December 2017, the Evaluation met relevant stakeholders and worked in close collaboration with the Project Management Unit (PMU).

Conclusions in brief

The Biosafety Law in Turkey prohibits LMOs environmental release. LMOs are subject of a highly strategic debate. Turkey and its commercial partners in the global food market are still considering which is the best option to foster, i.e. organic or genetically modified approach. However, the economically relevant poultry value chain requires huge quantities of GMO feed.

In Turkey all **National Biosafety Framework (NBF)** components are in place, including a Biosafety Law and two Regulations. The Competent National Authority (CNA) is institutionally and financially supported by the Ministry of Food, Agriculture and Livestock (MFAL) and ensures the Secretariat of the Biosafety Board; which is regularly working and deliberating. The List of Experts and two Scientific Committees (one on risk assessment/management and one on socio-economic considerations) are also functioning. A network of 54, public and private, accredited laboratories underpins the Monitoring and Inspection System.

The **Biosafety Law** is considered strict, and often implemented by the judiciary in a very severe manner. Moreover, although people have been informed how the NBF system works, **public trust** is not there. These shortcomings may still challenge smooth functioning of the NBF system.

In a context of full **national ownership and leadership**, the Project did play a catalytic role, triggering acceleration of the process and aggregating stakeholders around an array of activities (e.g. awareness-raising; training for laboratory people and customs officials; preparation and publication of guidelines and communication material).



Lessons learned (four lessons in brief)

1) National ownership and leadership are major factors of performance for sustainable achievements. Robust national initiative, leadership and ownership, based on national capabilities and commitment to a clear agenda, may ensure high rates of delivery.

2) National stakeholders' institutional memory may play a role as a major driving force, particularly in Projects addressing institutional building and human resources development. Projects may be catalytic in promoting and strengthening the institutional memory of national stakeholders.

3) Concrete people, women and men, make things happen. Projects may constitute for them a **learning opportunity** by providing the space for exchange, experimenting new paths and consolidating new skills, including soft skills.

4) Participatory approach and teamworking are instrumental to a learning-building evaluation. For a successful learning-oriented evaluation process, both appropriate tools and attitude are key factors.

For critical thinking, some **tools** are more propitious than others. Tools have to be inter-complementary and used in an adaptive manner, helping participants to take distance from events in which they personally played a role. Attitude is much about **soft skills** that have to be instrumental to trust building.

Annex VI. Final Project Output summary

Project Name: Implementation of National Biosafety Framework for Turkey

Project reference number: GFL/5060-2716-4E09

Country: Turkey

Components /Outcomes	Expected Output	Actual Output	Relevance and Effectiveness of the Output in the pathway to Outcomes and Impact: Aspects to be considered
Component 1: Stocktaking on biosafety Outcome : Stakeholder and gap analysis prepared	Stocktaking report that analyses the current status of modern biotechnology and biosafety system	Turkey's current situation report has been prepared.	
Component 2: Regulatory regime Outcome: Regulatory regime in place and legally mandated	Regulations under Biosafety Law approved	<ul style="list-style-type: none"> - Biosafety Law published in the Official Gazette no.27533 in 26/03/2010. - The Regulation on Genetically Modified Organisms and Products and - The Regulation Connected with Working Procedure and Principles of Biosafety Board and Committees (published in Official Gazette no.27671 in 13/08/2010). 	<p>The Regulatory Framework (Law and Regulations) is in force since 2010:</p> <ul style="list-style-type: none"> a) Which are the strong points to be highlighted ? b) Are there weak points to be addressed and improved? c) Is the legal framework sufficiently clear in terms of roles and responsibilities (Competent Authorities, Biosafety Board, Scientific Committees, others) d) Do Law and Regulations contemplate financial mechanisms for the implementation of the Framework (either through Government funding or from the applicants) ? e) Do politicians, public officers and the public in general know the Law?
	National Biosafety Committee (NBC) established	Biosafety Board has been established in 2010.	<ul style="list-style-type: none"> • Membership of the Board: are all sectors of society fairly included?
	Competent authorities (CA) and Scientific Advisory Committee (SAC) mandated	Scientific committees have been established instead of Scientific Advisory Committee.	<ul style="list-style-type: none"> • Which are the members? • Which has been the involvement and responsibility of the Scient. Comm. in Risk Assessment (RA)? • What has been done and will be done to improve the capacity of the Committees to carry on scientifically-sound RA?
	Manual on application procedure under the Law prepared	Guide on Application Procedures has been completed.	<ul style="list-style-type: none"> • Is the decision-making process clearly defined? • Which are the weak points to be addressed?
	Training for lawyers undertaken on legal aspects of transboundary movements of	Workshop on Biosafety Law and Implementation was held on 9-10 May 2016 by GDAR and the Turkey Justice Academy.	

Components /Outcomes	Expected Output	Actual Output	Relevance and Effectiveness of the Output in the pathway to Outcomes and Impact: Aspects to be considered
	LMOs and products thereof and other aspects about use of LMOs	A total of 134 lawyers and legal officers attended.	
Component 3: System for handling of requests for authorization (including administrative processing for risk assessment and informed decision-making), risk assessment and risk management Outcome: Functional system for handling of requests, risk assessment, decision-making and risk management of LMOs established	Human resources for handling of requests, risk assessment, decision-making and risk management of LMOs improved	<ul style="list-style-type: none"> - Several meetings included international workshop for risk assessment, decision-making and risk management have been completed. • The international workshop was held on 15-17 December 2015 by GDAR in Antalya . The workshop was attended by 100 people consisting of experts from the European Union, European Food Safety Authority, experts from the United States, institutions and organizations, NGOs, universities, professional organizations and private sector representatives from Turkey. • National workshops: • Risk Assessment and Management Seminar” was held in 27 June 2014 at Field Crops Central Research Institute in Ankara. A total of 43 people attended the meeting. • Risk Assessment and Management Seminar” was held in 29-30 May 2015 • in Afyon. A total of 80 people attended the meeting. 	<ul style="list-style-type: none"> • Are there clear guidelines on the functioning of the administrative system? • Is there appropriate coordination between the different partners involved in the administrative system? • Which are the bottle-necks of the system to be improved? • Is the process of decision-making always based on a scientifically-sound risk assessment? • To what extent are socio-economic considerations taken into account?
	Guidelines, methodologies and manuals on risk assessment, risk management and socio-economic evaluation prepared	Two guidelines were prepared as named below: 1- Technical Guideline for the Risk Assessment of Genetically Engineering Crops and Derived Food and Feed 2- Socio-economic Evaluation Criteria in Decision-Making Process for GMO and GMO Products	<ul style="list-style-type: none"> • Are these instruments already adopted and used? For which crops and traits? • Which are the socio-economic criteria adopted for the evaluation? • Have been farmers and consumers involved in this exercise?
	Internet portal, which is accessible by risk assessors, decision-makers and risk managers, prepared and functional for data collection, input and analysis for risk management and risk	The web site for data portal has been developed. www.tbdbm.gov.tr	THIS OUTPUT SHOULD BE PART OF COMPONENT 5 By whom? Is it linked to the global BCH? Who is feeding the portal? Who has access (users) to the portal ? How many users per year?

Components /Outcomes	Expected Output	Actual Output	Relevance and Effectiveness of the Output in the pathway to Outcomes and Impact: Aspects to be considered
	communication purposes		
	Criteria to consider possible socio-economical impacts determined and prioritized to be taken into consideration in the process of decision making	Guide on "Socio-economic Evaluation Criteria in Decision-Making Process for GMO and GMO Products" was prepared.	
Component 4: Follow-up mechanisms (monitoring of environmental effects and enforcement: control and inspections)	Laboratories and research institutes mandated and strengthened for monitoring and inspection	3 training workshops were organized for control personnel from 81 provinces. 285 people participated.	<ul style="list-style-type: none"> Is there appropriate coordination between the different institutions involved ? Are there clear mechanisms and procedures (ex. guidelines, protocols) for GMOs detection, inspection, law enforcement, etc. ?
Outcome: Monitoring and inspection system for LMOs established	Ankara Control Laboratory accredited for detections of LMOs and detection methods standardized to be used in mandated laboratories	Ankara Control Laboratory for detection and inspections on GMOs and products has been accredited on 2008.	Accredited at national level? By whom? At regional / international level? By whom?
	Human resources for monitoring, inspections, border controls, emergency response and compliance to Biosafety Law and the Protocol improved	<p>For monitoring, inspections, border controls,</p> <p>3 "hands on" trainings were organized for control personnel from 81 provinces on the definition and the history of the GMO, practices related to the GMOs in our country and the control, audit and monitoring of GMOs and 285 people participated in the training.</p> <p>For custom officers;</p> <ul style="list-style-type: none"> ➤ First Meeting was held in Mersin on 21-22 October 2015 (82 participants). ➤ Second Meeting was held in İzmir on 09-10 November 2015 (62 participants). ➤ Third Meeting was held in İstanbul on 28-29 January 2016 (85 participants). 	<ul style="list-style-type: none"> Is there already any feed-back / evaluation of the effectiveness of these trainings? Aspects to be considered to assess the effectiveness of the trainings: <ul style="list-style-type: none"> ➤ Quality of the training (e.g. duration, content, trainers, etc.) ➤ Organisation / Management Capacity of the institutions to put in value the new capacities acquired by the participants ➤ Tangible improvement in the performance of the institution as an effect of the training ➤ How does it work the referral system from decentralised officers / inspectors to the Competent Authority? How long does it take the procedure?

Components /Outcomes	Expected Output	Actual Output	Relevance and Effectiveness of the Output in the pathway to Outcomes and Impact: Aspects to be considered
		<ul style="list-style-type: none"> ➤ Fourth Meeting was held in Bursa on 21-22 March 2016 (79 participants). ➤ Fifth Meeting was held in Samsun 30-31 May 2016 (61 participants). ➤ Sixth Meeting was held in Kocaeli 2-3 June 2016 (34 participants). ➤ Seventh Meeting was held in Edirne 29 June 2017 (55 participants). ➤ Eight Meeting was held in in Tekirdağ 30 June 2017 (37 participants) 	<ul style="list-style-type: none"> • Is there any inter-country joint initiative (sub-regional level) of coordination with bordering countries?
	Guidelines, methodologies and manuals on monitoring, inspections and emergency response prepared	<p>Five guidelines were prepared as named below:</p> <ol style="list-style-type: none"> 1- Guide on application procedures 2- Technical Guideline for the Risk Assessment of Genetically Engineering Crops and Derived Food and Feed 3- Socio-economic Evaluation Criteria in Decision-Making Process for GMO and GMO Products 4- Guidelines on Control and Traceability of Genetically Modified Organisms and Products 5- Guide on "Civil Liability of Individuals under the Law on Biosafety", "Offenses under the Law on Biosafety" and "Misdemeanors and Administrative Sanctions in the Law on Biosafety" <p>In addition to "Safety and Emergency Measures on Biosafety in Turkey" has been completed.</p>	<ul style="list-style-type: none"> • To discuss future plans for improving existing guidelines and preparing new ones • To discuss current capacity of producing guidelines, manuals, etc
	Registration system with unique identifiers to trace back LMOs established	A registration system for the unique identifiers established by Biosafety Board.	
Component 5: Public awareness and participation Outcome: A functional system for	Public awareness action plan of NBF updated	Public awareness Action Plan has been reviewed Public awareness activity will continue	<ul style="list-style-type: none"> • How was the Plan formulated and reviewed? • Which has been the involvement of Civil Society and Private Sector in this task? • Does the Plan include clear procedures, mechanisms and entry-points for effective public

Components /Outcomes	Expected Output	Actual Output	Relevance and Effectiveness of the Output in the pathway to Outcomes and Impact: Aspects to be considered
public awareness and participation established for biosafety			<p>participation in policy decision-making regarding the introduction of GMOs in the country)? How?</p> <ul style="list-style-type: none"> Is there any initiative to enlarge the Biosafety Knowledge Community in the country? Do Academic Curricula include Biosafety?
	The public awareness raised through workshops, publications and trainings	<ul style="list-style-type: none"> ➤ Risk Assessment and Management Seminar was held on 27 June 2014 in Ankara, ➤ GMOs and Risk Analysis workshop-II was held on 29-30 May 2015 in Afyon. ➤ First Meeting was held in Mersin on 21-22 October 2015 (82 participants). ➤ Second Meeting was held in İzmir on 09-10 November 2015 (62 participants). ➤ Third Meeting was held in İstanbul on 28-29 January 2016 (85 participants). ➤ Fourth Meeting was held in Bursa on 21-22 March 2016 (79 participants). ➤ Fifth Meeting was held in Samsun 30-31 May 2016 (61 participants). ➤ Sixth Meeting was held in Kocaeli 2-3 June 2016 (34 participants). <p>These meetings/seminars include risk communication. The public awareness activities will continue</p>	To discuss the categories of the participants, are there aggregated / discriminated data by gender ?
	National BCH strengthened	The renewal of the web page completed	Global BCH also has to be updated with information in English (e.g. Law)

Annex VII. Stakeholders Matrix

Interest and power over Project results / implementation	Institutional role and responsibilities / mandate	Expected changes through project implementation	Effective changes through project implementation
Ministry of Food Agriculture Livestock, GDAR on the basis of 1) Law No. 4898 2) "Law on Biosafety" No. 5977 / 2010			
I = 6 P = 6 I/P = MFAL (former MARA) - GDAR <ul style="list-style-type: none"> NEA / National Executing Agency of the project Member of the NSC / Nat. Steering Committee 	i. Executing institution of the project ii. National focal point and competent authority for CPB iii. BCH Focal Point iv. Coordinator agency for handling of request, risk assessment and risk management of LMOs (????) v. to complement . vi. CNA	i. GDAR ii. National focal point GDAR and competent authority for CPB MFAL and Ministry of Forest and Water Affairs iii. GDAR iv. MFAL DG Food and Control Ministry: Biosafety Law article no: 2 (former MARA) Duties and authorization of the Ministry: Biosafety Law article no: 8	To Complement 6
Ministry of Food Agriculture Livestock, GD Food and Control			
I = P = I/P = <ul style="list-style-type: none"> Member of the NSC / Nat. Steering Committee 	Implementing the works and procedures stated in this Law, preventing, monitoring, controlling and auditing unfavourable GMO contaminants. Labelling	Biosafety Law article no: 8/c, 1	To Complement 6
Biosafety Board			
I = P = I/P =	Decision-making body To Complement Biosafety Board	To Complement Biosafety Board :Biosafety Law article no: 9 Working principles of the Biosafety Board: Biosafety Law article no: 10	To Complement 6

Interest and power over Project results / implementation	Institutional role and responsibilities / mandate	Expected changes through project implementation	Effective changes through project implementation
To Complement		Duties and authorization of the Biosafety Board: Biosafety Law article no: 11 Biosafety Board and duties : Regulation On Operation Procedures And Principles For Biosafety Board And Committees article 5,6,7,8	
Secretariat of Biosafety Board ↯			
I = P = I/P = To Complement	To Complement Secretariat of Biosafety Board	To Complement Secretariat of Biosafety Board/MFAL: Biosafety Law article no: 8/a Secretariat of Biosafety Board/MFAL/GDAR: Biosafety Law article no: 11 Biosafety Board: Regulation On Operation Procedures And Principles For Biosafety Board And Committees article 4/4	To Complement 6
Scientific Committees			
Risk assessment committee and socio-economic assessment committee			
I = P = I/P = To Complement	To Complement Risk assessment committee and socio-economic assessment committee	To Complement Risk assessment committee and socio-economic assessment committee Biosafety Law article no: 2/1/p Biosafety Law article no: 11/b, c Role: Biosafety Law article no: 12 Regulation On Operation Procedures And Principles For Biosafety Board And Committees article 10	To Complement 6
Ministry of Health Ministry of Economy Ministry of Environment and Urbanization Ministry of Forestry and Water Affairs			
I = P =	To Complement Member of Biosafety Board	To Complement Member of Biosafety Board: Biosafety Law article no: 9	To Complement 5

Interest and power over Project results / implementation	Institutional role and responsibilities / mandate	Expected changes through project implementation	Effective changes through project implementation
I/P = • Member of the NSC / Nat. Steering Committee	Member of the National Steering Committee	Regulation On Operation Procedures And Principles For Biosafety Board And Committees article 5 Duties and authorization of the Biosafety Board: Biosafety Law article no: 11	
Ministry of Justice			
I = P = I/P = To Complement	To Complement Member of Technical Sub-Working Group Stakeholder of the project	To Complement	To Complement 4
Ministry of Science, Industry and Technology			
I = P = I/P = Member of the NSC / Nat. Steering Committee To Complement	To Complement Member of Biosafety Board Member of the National Steering Committee	To Complement This project catalysed to prepare “National Strategy and Action Plan on Biotechnology” 2015-2018. It is including enhancement of the biosafety and biotechnology process in Turkey. On the other hand, two national steering committee members are going on work with the Ministry of Science, Industry and Technology Biotechnology Working Group to monitoring of the “National Strategy and Action Plan on Biotechnology” applications in 2018.	To Complement 6
The Scientific and Technological Research Council of Turkey			
	Member of Technical Sub-Working Group Stakeholder of the project		
Ankara University			
I = P = I/P = Complement	To Complement Member of Biosafety Board	To Complement Member of Biosafety Board: Biosafety Law article no: 9	To Complement 6

Interest and power over Project results / implementation	Institutional role and responsibilities / mandate	Expected changes through project implementation	Effective changes through project implementation
		Regulation On Operation Procedures And Principles For Biosafety Board And Committees article 5 Duties and authorization of the Biosafety Board: Biosafety Law article no: 11	
Middle east Technical University (METU)			
I = P = I/P = Complement	To Complement Member of the National Steering Committee	To Complement METU supported us with training programs on technical and theoretical part of the project.	To Complement 6
Chamber of Food Engineers			
I = P = I/P = To Complement	To Complement Member of Biosafety Board Member of the National Steering Committee	To Complement Member of Biosafety Board: Biosafety Law article no: 9 Regulation On Operation Procedures And Principles For Biosafety Board And Committees article 5 Duties and authorization of the Biosafety Board: Biosafety Law article no: 11	To Complement 6
Biotechnology Association			
I = P = I/P = To Complement	To Complement Member of the National Steering Committee	To Complement Biotechnology Association supported us with training programs on technical and theoretical part of the project.	To Complement 6
Turkish Feed Manufacturers' Association			
I = P = I/P = To Complement	To Complement Member of Technical Sub-Working Group Stakeholder of the project	To Complement Turkish Feed Manufacturers' Association was active partner for all meetings, training programs and so on. Their participant was so important because they are main applicant for approving procedure of GM feed in TR. That's why they learned so many issue about the risk assessment and monitoring of the GMOs.	To Complement 6
Ultimate beneficiaries – traders (e.g. feed traders)			

Interest and power over Project results / implementation	Institutional role and responsibilities / mandate	Expected changes through project implementation	Effective changes through project implementation
Turkish Feed Manufacturer's Association Turkish Poultry Meat Producers and Breeders Association Turkish Egg Producers Association			
I = P = I/P = To Complement	To Complement Stakeholder of the project	To Complement Traders were active partner for all meetings, training programs and so on. Their participant was so important because they are main applicant for approving procedure of GM feed in TR. That's why they learned so many issue about the risk assessment and monitoring of the GMOs.	To Complement 6

Annex VIII. List of Strengths and Weaknesses updated

STRENGTHS

1. The presence of the Biosafety Law (6)
2. The presence of rules intended to inform the public (3)
3. A system which is special to the country (4)
4. Biosafety Board is multi-disciplinary (6)
5. The possibility of private and public sector collaboration(4)
6. The adoption of the precautionary principle (3)
7. Law is based on the Cartagena Protocol on Biosafety (4)
8. The existence of criminal sanctions (2)
9. Risk assessment and socio - economic assessment take place in the legislation (6)
10. The issue of monitoring is included in the Law (5)
11. Prohibited matters are defined clearly (4)
12. Products entering and leaving the country are under control (6)
13. The inclusion of measures related to biological diversity (4)
14. Board's decisions are transparent and ensure public participation (6)
15. Scientific studies don't face obstacles (4)
16. Board's decisions are based on scientific risk assessment and socio-economic assessment reports (6)
17. Approvals are limited to a certain period of time (6)
18. The right to appeal in the case of refusal (6)
19. Applications are open to importers and users (6)
20. Subject to the GMO and its products, the obligation of being in the country's market of where the products were developed(5)
21. Standart rules have been established regarding labelling and labelling is being inspected (6)

22. Application, evaluation and decision-making processes have been defined in the legislation (6)
23. The importance given to traceability (6)
24. The existence of accredited laboratories capable of analyzing GMO's and all its products approved as animal food (6)
25. Information activities are being carried out for provincial directorates of the Ministry of Food, Agriculture and Livestock (6)
26. The establishment of Biosafety Clearing-House Mechanism of Turkey (6)
27. Media interest in the topic (6)

WEAKNESSES

We are giving the scale from 1 (before Project score) to 6 (after Project score)!

1. Different perceptions between regulation and implementation (4)
2. Insufficient information is given to implementers concerning the law (4)
3. Gene owners refrain from applying due to finding the legal sanctions very heavy (4)
4. Biosafety Board's inability of institutionalizing due to the shortcomings in the legislation (5)
5. Insufficient information is given to industrialists and third parties concerning the law (4)
6. Provisions relating to destruction, waste and water treatment are not adequate and explanatory (5)
7. Lack of regulation for the threshold of contamination to different products apart from approved source of genes (6)
8. Lack of information of scientific risk assessment committees about working rules (6)
9. Lack of an independent and institutional structure like EFSA, JRC for risk assessment (6)
10. Having a small number of accredited laboratories (6)
11. Lack of cooperation on issues regarding laboratory analysis methods and development of procedures with the EU(6)
12. Different interpretation in the application of penalties (3)
13. Lack of training of control officers (5)
14. Lack of manpower and technical infrastructure facilities for inspection and the control mechanism(5)

15. Lack of education in sampling techniques (6)
16. Visual and printed media tools are not used for the training of implementers and users (producers, farmers, importers, etc.) (3)
17. Inter-laboratory comparative tests are not arranged sufficiently enough (3)
18. Small number of laboratories engaged in quantification (6)
19. Lack of the continuity of staff specialized in the provincial directorates of the Ministry of Food, Agriculture and Livestock (4)
20. Failure to ensure continuity of staff training (4)
21. Lack of information of the public (2)
22. Other ministries (like the Ministry of Customs and Trade) representatives don't take place in the Biosafety Board (1)
23. Media gives credit to people who are biased and not expert in the subject matter (3)
24. Failure to provide comprehensive information to the public (2)
25. Biosafety Clearing-House Mechanism of Turkey lacks of content(3)
26. Lack of use of accurate disclosure methods (4)
27. GMO and non-GMO products lack of distinction in Customs Tariff Position (CTP) (4)
28. Experts in communication don't take part in related studies of the subject matter(3)

Annex IX. List of Documents Consulted

Turkey:

1. ANUBIS: PIRs, Budget Revisions, Audit Reports, Power-point presentations of Project's activities and results
2. Biosafety Law, 2010; Law Nr. 5977; Date of Enactment: 18/3/2010
3. GEF Project Identification Form "Capacity Building for Implementation of the Cartagena Protocol on Biosafety in Turkey – Phase II"
4. GEF Tracking Tool (app. 15 of the ProDoc), the Biosafety Law and interviews with relevant stakeholders
5. Power-point "IMPLEMENTATION of BIOSAFETY BOARD", Prof. Dr. Hakan YARDIMCI
6. Power-point presentation, "Support for the Implementation of the National Biosafety Framework of the Republic of Turkey", from Project Assistant, Birgül GÜNER
7. Project Document "Implementation of National Biosafety Framework for Turkey", and its Annexes (in ANUBIS)
8. Regulation on Genetically Modified Organisms and Their Products
9. Regulation on Operation Procedures and Principles for Biosafety Board and Committees
10. Socio-Economic Evaluation Criteria in Decision-Making Process for GMO and GMO Products, Emin Olhan
11. The National Biological Diversity Strategy and Action Plan of 2007

Global:

- Bali Strategic Plan for Technology Support and Capacity- building
- Cartagena Protocol on Biosafety (CPB)
- CPB – BCH, Convention on Biological Diversity, Cartagena Protocol on Biosafety, Strategic plan of CPB 2011-20 http://bch.cbd.int/protocol/issues/cpb_stplan.shtml
- CPB – BCH, Framework and Action Plan for Capacity Building for the Effective Implementation of the Cartagena Protocol on Biosafety for 2011 – 2020 - http://bch.cbd.int/protocol/publications/bs_frameworkactionplan_en.pdf?download
- CPB – BCH, Proposed biennial programme of work and budget for 2012–2013
- GEF, Focal Area Strategy for GEF 4 - http://www.thegef.org/sites/default/files/documents/GEF4-Focal-Area_strategy.pdf
- GEF, Gender Equality Action Plan, 2015, https://www.thegef.org/sites/default/files/publications/GEF_GenderEquality_CRA_lo-res_0.pdf
- GEF, Guidelines for GEF Agencies in Conducting Terminal Evaluations Evaluation Document No. 3, 2008
- GEF, ROt - Review of Outcomes to Impact: Practitioners Handbook, 2009, GEF
- GEF, The GEF and the Sustainable Development Goals https://www.thegef.org/sites/default/files/publications/SDG_new_boilerLR_0.pdf
- IDS, Public Participation and the Cartagena Protocol on Biosafety, A review for DfID and UNEP-GEF (IDS)
- IUCN, An Explanatory Guide to the Cartagena Protocol on Biosafety, IUCN, 2003
- IUCN, Genetically Modified Organisms and Biosafety: A background paper for decision-makers and others to assist in consideration of GMO issues, IUCN, 2004

- Nagoya – Kuala Lumpur Supplementary Protocol on Liability and Redress to the Cartagena Protocol on Biosafety
- UN Environment Evaluation Office, Guidelines to the Consultants, “Criterion Rating Description”, updated November 2017, in progress.
- UNEG / UN Evaluation Group guidance document on “Integrating Human Rights and Gender Equality in Evaluations”, 2014.
- UNEP – GEF, A Comparative Analysis of Experiences and Lessons from the UNEP-GEF Biosafety Projects, 2006, UNEP-GEF Biosafety Unit
- UNEP – GEF, Guidance towards Implementation of National Biosafety Frameworks: Lessons Learned from the UNEP Demonstration Projects, 2008, UNEP-GEF Biosafety Unit
- UNEP – GEF, Learning from experience, the global UNEP-GEF BCH Capacity building project, UNEP-GEF; UNEP-GEF Biosafety Unit; April 2008
- UNEP Medium-term Strategy 2010–2013, “Environment for Development”
- UNEP tools on “Stakeholder Analysis in the Evaluation Process”
- UNEP, Guidelines from the Evaluation Office to the Consultants, “Criterion Rating Description”, Updated November 2017, still in progress.
- UNEP, Proposed biennial programme and support budgets for 2010-2011, UNEP
- UNEP, Status of capacity-building activities, UNEP/CBD/BS/COP-MOP/5/INF/9, September 2010
- UNEP, Use of Theory of Change in project evaluations (UNEP, 2016)
- UNEP-GEF Toolkits for the Development of National Biosafety Frameworks
http://staging.unep.org/biosafety/Documents/Drafting_the_NBF_Formulation_of_the_regulatory_regime.pdf
- OHCHR Office High Commissioner Human Right, Human Rights and Sustainable Development Goals,
<http://www.ohchr.org/EN/Issues/MDG/Pages/The2030Agenda.aspx>

c) Websites

1. Biosafety Clearing House <https://bch.cbd.int/>
2. fifth meeting, the COP-MOP, in decision BS-V/16, adopted the Strategic Plan for the Cartagena Protocol on Biosafety covering the period 2011 to 2020.
3. Turkey Biosafety Clearing-House
4. UN Environment, Evaluation, <http://www.unep.org/evaluation/>
5. EFSA European Food Safety Authority
<https://www.efsa.europa.eu/en/topics/topic/environmental-risk-assessment>

Annex X. Brief CV of the Consultant

Emilia Venetsanou has a Master in Sociology / Philosophy, the European Master in Human Rights and Good Governance, a PhD in Communication for Development and further studies in “Food Security & Social Protection” (by The School of Oriental and African Studies - SOAS, University of London - Centre for Development, Environment and Policy - CeDEP), in “International Leadership and Organisational Behaviour” (Bocconi University) and in “Rural Extension & training” (FAO – Diploma).

Since 1983, Emilia has been working in the field of international cooperation for development. She worked as a senior executive for National and International Institutions (the European Commission, the Government of Cape Verde, the Swiss Development Cooperation - SDC, the Office of the High Commissioner for Human Rights and INGOs) and as consultant for International Agencies (FAO, UNESCO, World Bank, Global Fund AIDS Malaria Tuberculosis - GFATM, USAID and the UN Environment). She worked in: Angola, Belgium (Brussels), Brazil, Burkina Faso, Cape Verde, Greece, India, Kenya, Mauritania, Mozambique, South Africa, Swaziland, Turkey.

Emilia has strong experience as adviser in policy making, in strategic planning (including the United Nations Development Assistance Framework - UNDAF, the European Development Fund – EDF and Country Strategy Paper - CSP, the Poverty Reduction Strategy Paper - PRSP), in Program Cycle Management (PCM) and in Results Based Management (RBM). Emilia can claim robust experience as Senior Evaluator with the UN system and the European Commission.

She is a seasoned development worker, trainer and mentor as well as an affirmed expert in cross-cutting issues, including Gender, Equity, Human Rights and Governance and their mainstreaming into policy agenda and the development programming exercise. She has relevant experience in “alignment and harmonisation / aid effectiveness” and in MDGs agenda and Poverty Reduction.

Emilia has robust experience in the social sector, including health and education, as well as, in rural development and communities’ empowerment, domain in which she conducted relevant studies, including field research, academic work and the design of methodological guides. She is seasoned in decentralised and participatory planning, including drafting of guidance papers and manuals.

Emilia is an International expert in Human Rights Based Approach (HRBA) for Sustainable Development. Since the 80s, she works as policy and strategy adviser for sustainable, inclusive and equitable development and she has field experience and research activity on the promotion of sustainable livelihoods, protection from vulnerability, food and nutritional security. She also has valuable experience in prevention mechanisms / early warning systems and in the Humanitarian – Recovery – Development continuum.

Since 2009, Emilia has been working on the Right to Adequate Food, including at policy-making level. Inter alia, in 2010, she carried out a desk study for the European Commission, considering “whether” and “how” the RtF could be integrated in the revised “EU policy framework to assist developing countries in addressing food security challenges”. The policy has been adopted in May 2010, including relevant elements of Emilia’s desk study (3011th FOREIGN AFFAIRS Council 10 May 2010).

Annex XI. Quality Assessment of the Evaluation Report

Evaluation Title:

Terminal Evaluation of the UN Environment Project: “Implementation of National Biosafety Framework for Turkey”

All UN Environment evaluations are subject to a quality assessment by the Evaluation Office. This is an assessment of the quality of the evaluation product (i.e. evaluation report) and is dependent on more than just the consultant’s efforts and skills. Nevertheless, the quality assessment is used as a tool for providing structured feedback to the evaluation consultants, especially at draft report stage. This guidance is provided to support consistency in assessment across different Evaluation Managers and to make the assessment process as transparent as possible.

	UN Environment Evaluation Office Comments	Final Report Rating
Substantive Report Quality Criteria		
<i>Quality of the Executive Summary:</i> The Summary should be able to stand alone as an accurate summary of the main evaluation product. It should include a concise overview of the evaluation object; clear summary of the evaluation objectives and scope; overall evaluation rating of the project and key features of performance (strengths and weaknesses) against exceptional criteria (plus reference to where the evaluation ratings table can be found within the report); summary of the main findings of the exercise, including a synthesis of main conclusions (which include a summary response to key strategic evaluation questions), lessons learned and recommendations.	The Executive summary provides a good overview of the findings of the evaluation and highlights the main conclusions lessons and recommendations.	6
<i>I. Introduction</i> A brief introduction should be given identifying, where possible and relevant, the following: institutional context of the project (sub-programme, Division, regions/countries where implemented) and coverage of the evaluation; date of PRC approval and project document signature); results frameworks to which it contributes (e.g. Expected Accomplishment in POW); project duration and start/end dates; number of project phases (where appropriate); implementing partners; total secured budget and whether the project has been evaluated in the past (e.g. mid-term, part of a synthesis evaluation, evaluated by another agency etc.) Consider the extent to which the introduction includes a concise statement of the purpose of the evaluation and the key intended audience for the findings?	Precise, well written and captures the main introductory points.	5

	UN Environment Evaluation Office Comments	Final Report Rating
<p>II. Evaluation Methods</p> <p>This section should include a description of how the <i>TOC at Evaluation</i>⁷¹ was designed (who was involved etc.) and applied to the context of the project?</p> <p>A data collection section should include: a description of evaluation methods and information sources used, including the number and type of respondents; justification for methods used (e.g. qualitative/quantitative; electronic/face-to-face); any selection criteria used to identify respondents, case studies or sites/countries visited; strategies used to increase stakeholder engagement and consultation; details of how data were verified (e.g. triangulation, review by stakeholders etc.).</p> <p>The methods used to analyse data (e.g. scoring; coding; thematic analysis etc.) should be described. It should also address evaluation limitations such as: low or imbalanced response rates across different groups; extent to which findings can be either generalised to wider evaluation questions or constraints on aggregation/disaggregation; any potential or apparent biases; language barriers and ways they were overcome.</p> <p>Ethics and human rights issues should be highlighted including: how anonymity and confidentiality were protected and strategies used to include the views of marginalised or potentially disadvantaged groups and/or divergent views.</p>	<p>This section is complete and it covers the required sub-topics satisfactorily</p>	5
<p>III. The Project</p> <p>This section should include:</p> <ul style="list-style-type: none"> • <i>Context</i>: Overview of the main issue that the project is trying to address, its root causes and consequences on the environment and human well-being (i.e. synopsis of the problem and situational analyses). • <i>Objectives and components</i>: Summary of the project's results hierarchy as stated in the ProDoc (or as officially revised) • <i>Stakeholders</i>: Description of groups of targeted stakeholders organised according to relevant common characteristics • <i>Project implementation structure and partners</i>: A description of the 	<p>This section is also complete and covers all the required sub-topics in a concise and clear manner. The discussion on stakeholders, gender and human rights are notably well covered.</p>	6

⁷¹ During the Inception Phase of the evaluation process a *TOC at Design* is created based on the information contained in the approved project documents (these may include either logical framework or a TOC or narrative descriptions). During the evaluation process this TOC is revised based on changes made during project intervention and becomes the *TOC at Evaluation*.

	UN Environment Evaluation Office Comments	Final Report Rating
<p>implementation structure with diagram and a list of key project partners</p> <ul style="list-style-type: none"> • <i>Changes in design during implementation:</i> Any key events that affected the project's scope or parameters should be described in brief in chronological order • <i>Project financing:</i> Completed tables of: (a) budget at design and expenditure by components (b) planned and actual sources of funding/co-financing 		
<p>IV. Theory of Change</p> <p>A summary of the project's results hierarchy should be presented for: a) the results as stated in the approved/revised Prodoc logframe/TOC and b) as formulated in the TOC at Evaluation. <i>The two results hierarchies should be presented as a two column table to show clearly that, although wording and placement may have changed, the results 'goal posts' have not been 'moved'.</i> The TOC at Evaluation should be presented clearly in both diagrammatic and narrative forms. Clear articulation of each major causal pathway is expected, (starting from outputs to long term impact), including explanations of all drivers and assumptions as well as the expected roles of key actors.</p>	<p>The TOC diagram is coherent and is a result of a consultative process. The narrative is clear and provides a suitable explanation of the causal pathways depicted in the diagrammatic representation. Drivers and Assumptions, as well as stakeholders/change agents in the pathways are described. Minor clarifications and re-phrasing of Drivers and Assumptions were needed. Suggested changes on the interpretation of the TOC drivers and assumptions were effected in the final report version.</p>	6
<p>V. Key Findings</p> <p>A. Strategic relevance:</p> <p>This section should include an assessment of the project's relevance in relation to UN Environment's mandate and its alignment with UN Environment's policies and strategies at the time of project approval. An assessment of the complementarity of the project with other interventions addressing the needs of the same target groups should be included. Consider the extent to which all four elements have been addressed:</p> <ul style="list-style-type: none"> v. Alignment to the UN Environment Medium Term Strategy (MTS) and Programme of Work (POW) vi. Alignment to UN Environment/GEF/Donor Strategic Priorities vii. Relevance to Regional, Sub-regional and National Environmental Priorities viii. Complementarity with Existing Interventions 	<p>Section is well done and covers all the main aspects of relevance prescribed in the TOR in sufficient detail</p>	6
<p>B. Quality of Project Design</p> <p>To what extent are the strength and weaknesses of the project design effectively <u>summarized</u>?</p>	<p>The strengths and weaknesses of the design are sufficiently described. Where relevant, cross referencing to other sections of the report as well as references to the PDQ</p>	6

	UN Environment Evaluation Office Comments	Final Report Rating
	assessment that was completed at the inception phase have been used to further support the assessment and rating of this criterion.	
C. Nature of the External Context For projects where this is appropriate, key external features of the project's implementing context that may have been reasonably expected to limit the project's performance (e.g. conflict, natural disaster, political upheaval) should be described.	Satisfactory. The report adequately gives an indication of the external/contextual issues that could have affected implementation.	5
D. Effectiveness (i) Outputs and Direct Outcomes: How well does the report present a well-reasoned, complete and evidence-based assessment of the achievement of a) outputs, and b) direct outcomes? How convincing is the discussion of attribution and contribution, as well as the limitations to attributing effects to the intervention.	Outputs are described by component, and with sufficient evidence provided to support a detailed assessment of the delivery of outputs. Qualitative aspects of output delivery are included in the assessment. The chapter also presents a qualitative analysis of the Direct Outcomes achieved using examples that underpin the judgement on the extent of their achievement. Assessments made in this section are consistent with the reconstructed Theory of Change (TOC) presented in section 4 or the report. Only minor amendments/clarifications were needed. Suggested improvements have been effected especially in the assessment of direct outcomes.	6
(ii) Likelihood of Impact: How well does the report present an integrated analysis, guided by the causal pathways represented by the TOC, of all evidence relating to likelihood of impact? How well are change processes explained and the roles of key actors, as well as drivers and assumptions, explicitly discussed?	The narrative provides a considered analysis of the causal pathways from outcomes to intermediate states through to impact. Cross referencing to the TOC has also been used	5
E. Financial Management This section should contain an integrated analysis of all dimensions evaluated under financial management. And include a completed 'financial management' table. Consider how well the report addresses the following: <ul style="list-style-type: none"> • <i>completeness</i> of financial information, including the actual project costs (total and per activity) and actual co-financing used • <i>communication</i> between financial and project management staff and 	A table summarizing financial management performance is included. Issues of completeness, communication and compliance are addressed. Narrative accompanying the table could be improved to provide a clearer analysis of the completeness, communication and compliance aspects of financial management	4.5

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<ul style="list-style-type: none"> <i>compliance</i> with relevant UN financial management standards and procedures. 		
<p>F. Efficiency To what extent, and how well, does the report present a well-reasoned, complete and evidence-based assessment of efficiency under the primary categories of cost-effectiveness and timeliness including:</p> <ul style="list-style-type: none"> Implications of delays and no cost extensions Time-saving measures put in place to maximise results within the secured budget and agreed project timeframe Discussion of making use of/building on pre-existing institutions, agreements and partnerships, data sources, synergies and complementarities with other initiatives, programmes and projects etc. The extent to which the management of the project minimised UN Environment's environmental footprint. 	<p>This section has been covered rather briefly though it covers most of the required categories of cost-effectiveness and timeliness.</p>	4.5
<p>G. Monitoring and Reporting How well does the report assess:</p> <ul style="list-style-type: none"> Monitoring design and budgeting (<i>including SMART indicators, resources for MTE/R etc.</i>) Monitoring implementation (<i>including use of monitoring data for adaptive management</i>) Project reporting (<i>e.g. PIMS and donor report</i>) 	<p>This section is well covered and goes beyond assessing the progress reporting by also looking into the project's results-based monitoring and identifying the gaps in the overall M&E system.</p>	6
<p>H. Sustainability How well does the evaluation identify and assess the key conditions or factors that are likely to undermine or contribute to the persistence of achieved direct outcomes including:</p> <ul style="list-style-type: none"> Socio-political Sustainability Financial Sustainability Institutional Sustainability (<i>including issues of partnerships</i>) 	<p>The assessment of sustainability does identify the most pertinent issues likely to undermine sustenance of outcomes. The analysis is rather brief in some instances (institutional and financial aspects) but has been found adequate.</p>	5
<p>I. Factors Affecting Performance These factors are <u>not</u> discussed in stand-alone sections but are integrated in criteria A-H as appropriate. To what extent, and how well, does the evaluation report cover the following cross-cutting themes:</p> <ul style="list-style-type: none"> Preparation and readiness 	<p>These factors are not explicitly covered within the report in as far as they have affected performance, however the ratings table provides some brief summaries of their status. Improvements noted in the final report version</p>	5

	UN Environment Evaluation Office Comments	Final Report Rating
<ul style="list-style-type: none"> • Quality of project management and supervision⁷² • Stakeholder participation and co-operation • Responsiveness to human rights and gender equity • Country ownership and driven-ness • Communication and public awareness 		
VI. Conclusions and Recommendations i. Quality of the conclusions: The key strategic questions should be clearly and succinctly addressed within the conclusions section? It is expected that the conclusions will highlight the main strengths and weaknesses of the project, and connect them in a compelling story line. Conclusions, as well as lessons and recommendations, should be consistent with the evidence presented in the main body of the report.	The conclusions section is well developed and presents the most critical findings of the evaluation. Responses to the key strategic questions are also discussed.	5
ii) Quality and utility of the lessons: Both positive and negative lessons are expected and duplication with recommendations should be avoided. Based on explicit evaluation findings lessons should be rooted in real project experiences or derived from problems encountered and mistakes made that should be avoided in the future. Lessons must have the potential for wider application and use and should briefly describe the context from which they are derived and those contexts in which they may be useful.	The context is summarized well and cross references have been used adequately. Some suggestions were provided to help structure the lessons learned in a way that they could have wider application and be more instructive. Suggested amendments have been effected satisfactorily in the final report version	6
iii) Quality and utility of the recommendations: To what extent are the recommendations proposals for specific actions to be taken by identified people/position-holders to resolve concrete problems affecting the project or the sustainability of its results. They should be feasible to implement within the timeframe and resources available (including local capacities) and specific in terms of who would do what and when. Recommendations should represent a measurable performance target in order that the Evaluation Office can monitor and assess compliance with the recommendations.	Some suggestions have been provided to help structure the recommendations as actionable proposals. Amendments have been effected satisfactorily in the final report version	5
VII. Report Structure and Presentation Quality		
i) Structure and completeness of the report: To what extent does the report follow the Evaluation	Report is complete and follows the Evaluation Office guidelines	6

⁷² In some cases 'project management and supervision' will refer to the supervision and guidance provided by UN Environment to implementing partners and national governments while in others, specifically for GEF funded projects, it will refer to the project management performance of the executing agency and the technical backstopping provided by UN Environment.

	UN Environment Evaluation Office Comments	Final Report Rating
Office guidelines? Are all requested Annexes included and complete?		
ii) Quality of writing and formatting: Consider whether the report is well written (clear English language and grammar) with language that is adequate in quality and tone for an official document? Do visual aids, such as maps and graphs convey key information? Does the report follow Evaluation Office formatting guidelines?	Final report is clear and has a professional quality and tone	6
OVERALL REPORT QUALITY RATING		5.45 HS

A number rating 1-6 is used for each criterion: Highly Satisfactory = 6, Satisfactory = 5, Moderately Satisfactory = 4, Moderately Unsatisfactory = 3, Unsatisfactory = 2, Highly Unsatisfactory = 1. The overall quality of the evaluation report is calculated by taking the mean score of all rated quality criteria.